

City of Battle Creek, Michigan

Community Development

Consolidated Annual Performance Evaluation Report (CAPER)

2015 - 2016

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 2015-16 Annual Action Plan highlighting the community development initiatives accomplished during the period of July 1, 2015 through June 30, 2016. This is the City of Battle Creek's first annual performance report for the Program Year (PY) 2015 – 2019 Consolidated Plan.

In the 2015-16 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)

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	35	7	20.00%	4	7	175.00%
Housing Code Enforcement	Affordable Housing Non-Housing Community Development	CDBG: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	12500	3139	100.00%	2500	3139	100.00%
Placemaking and strategic planning	Affordable Housing Non-Housing Community Development	CDBG: \$	Other	Other	5	1	20.00%	1	1	100.00%
Production of new rental units	Affordable Housing	CDBG: \$	Rental units constructed	Household Housing Unit	20	0	0.00%			
Program Delivery	Program Administration	CDBG: \$ / HOME: \$	Other	Other	5	1	20.00%	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	54	54	100.00%	54	54	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%			

Public Services	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	100	0	0.00%			
Rehabilitation and repair of homeowner housing	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	280	50	17.86%	65	50	76.92%
Rehabilitation of existing rental units	Affordable Housing	HOME: \$	Rental units rehabilitated	Household Housing Unit	2	2	100.00%			
Rehabilitation of existing rental units	Affordable Housing	HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	0		2	2	100.00%
Rental Assistance	Affordable Housing Homeless	HOME: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	18	12	66.67%	18	12	66.67%

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 during the 2015-16 program year 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 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 following accomplishments from the 2015-16 program year highlight the progress being made to address priority needs:

Improve property conditions in LMI neighborhoods

- Code Compliance completed 4,430 enforcements within CDBG target areas, addressing blight, health and safety issues related to housing at 3,122 unique addresses.

Reduce blighted vacant and abandoned buildings

- Code Compliance completed 309 new enforcements on vacant, abandoned or dangerous buildings in CDBG target areas. More than 800 vacant or abandoned buildings were monitored monthly during the program year.
- Demolitions were completed on seven blighted properties using CDBG funds.
- Demolitions were completed on nine foreclosed, blighted properties using \$250,000 in “Hardest Hit” funds secured through a successful application to the Michigan Blight Elimination Program in 2015. Previously completed CDBG funded work helped make the City’s application one of the best in the state. Of the 41 applicants to the program, only 19 were awarded funds, and the City was one of just four awarded the full amount of \$250,000. Instrumental in the City’s successful application were the leveraging of demolition activity funded through the City’s CDBG program, CDBG funded neighborhood analysis demonstrating the impact of vacant buildings within targeted areas, and extensive resident input gathered as part of the City’s Consolidated Plan.
- The City was awarded another \$99,300 by the State in 2016 to demolish another seven properties in CDBG target areas.
- Worked with community stakeholders to improve the City’s vacant and abandoned buildings ordinance. The community engagement process resulted in broad support for the changes, even amongst groups that initially opposed it, and led to a more effective ordinance, increasing accountability around the most blighted properties and removing barriers to putting other vacant properties back into productive use. This change addressed a number of concerns raised during the community engagement process for the consolidated plan (see the City’s 2014 Public Engagement Report at www.battlecreekmi.gov/186).
- The Calhoun County Land Bank Authority (CCLBA) completed 26 demolitions in CDBG target areas with \$264,000 NSP2 funds from the Michigan State Housing Development Authority (MSHDA)

Ensure the safety of rental housing

- Code Compliance completed 1,276 rental inspections in CDBG target areas.
- Participated in the creation of 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.

- Completed an analysis of rental registration data, census data and assessor's records that showed 94% of Battle Creek rentals have been registered with the City—more than at any other time in Battle Creek's history and triple the amount registered in 2005.

Develop, preserve and help people access quality, affordable housing

- Southwest Michigan Community Development Corporation (SWMCDC), formerly known as Neighborhoods, Inc. of Battle Creek, completed a HOME funded rental redevelopment project within the City's Neighborhood Stabilization Program (NSP2) target area, renovating a blighted property adjacent to a neighborhood park into a beautiful duplex which features two, three bedroom apartments that have already been rented to income-eligible households.
- The City's Minor Home Repair program completed 47 projects for low and moderate income home owners.
- Community Action completed three home rehab projects using City HOME program funds and are nearing completion on three more for low and moderate home owners.
- Community Action began implementation of a new Tenant Based Rental Assistance Program. Twelve households were provided rental assistance during the program year.
- City completed construction on two acquisition/development/resale projects funded with NSP2 program income funds through the Michigan State Housing Development Authority. The projects were located within the NSP2 target area on blocks that have seen significant redevelopment work. Both projects had pending offers from eligible buyers within two weeks of being listed.

Improve fair housing awareness and accountability

- Contracted with the Fair Housing Center of Southwest Michigan to do four fair housing trainings. The Fair Housing Center provided an additional four training opportunities and a conference that were attended by Battle Creek residents and agencies.
- Contracted with the Fair Housing Center to conduct the following three systemic investigations: real estate sales investigation; individual investors in rental properties investigation; and companion animal acceptance investigation.
- The City reconstituted its 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 also reviews and advises on fair housing issues and the results of systemic investigations. A representative from Community Development attends all meetings.
- The manager of Community Development has participated in *White Men As Allies* training through the Center for Diversity and Inclusion located at Kellogg Community College.

Increase community engagement

- Community Development staff completed seven workshops with neighborhood planning councils on community needs. These were in addition to four public hearings held annually as part of the planning and reporting process for the annual action plan.
- Worked with neighborhood planning council members to write Blight Elimination Grants to fund demolitions in their neighborhoods. Resident collected data was used to identify hotspot areas.

In one planning council area members determined the demolition sites via a neighborhood tour with City staff.

- Community Development staff convened an advisory committee made up of representatives from the Police Department, Planning, Code Compliance, the CCLBA, Community Action, SWMCDC, and the North Central Neighborhood Planning Council (NPC) over the course of three two hour workshops to target 2016-17 HOME resources within the Northcentral CDBG target area.

Improve amenities and infrastructure in LMI areas through place-making

- One streets project was initiated in the 2015-16 program year and is nearing completion.

Support collaborative homelessness efforts

- Community Development staff participated in the Homeless Coalition of Greater Battle Creek and Calhoun County, attending monthly meetings, serving on its executive board, and participating on various sub-committees.
- During the 2015-16 program year, Community Development staff helped lead an organizational assessment of the Homeless Coalition.
- Attended the state-wide Summit on Ending Homelessness, October 28-29, 2015 in Livonia.
- The City of Battle Creek's Parks and Recreation facility, Full Blast, hosted and City staff helped organize the 2015 Homeless Health Fair and VA Stand Down attended by 517 homeless individuals.

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	25	6
Black or African American	22	9
Asian	0	0
American Indian or American Native	0	0
Native Hawaiian or Other Pacific Islander	0	0
Total	47	15
Hispanic	0	1
Not Hispanic	47	14

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 owner rehab program, the rental rehab program, and tenant based rental assistance program.

African-Americans made up 50 percent of beneficiaries served by City housing programs, a level considered slightly higher than the proportionate 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. Hispanic and Latino persons make up 6.7% of the population, but made up only 1.6% of the beneficiaries of CDBG and HOME programs in the 2015-16 program year.

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		4,400,000	760,513
HOME		840,000	253,388

Table 3 - Resources Made Available

Narrative

CDBG spending:

- CDBG General Administration \$98,597
- Strategic Planning \$121,557
- Code Enforcement \$341,927
- Housing Rehab – Minor Home Repair \$438,691
- Street Reconstruction Program \$100,000
- Demolition Program \$30,000

HOME spending:

- HOME General Administration \$21,189
- Home Owner Rehabilitation \$115,000
- Acquisition/Development/Resale \$75,000
- Rental Rehabilitation \$171,273
- Tenant Based Rental Assistance \$26,703

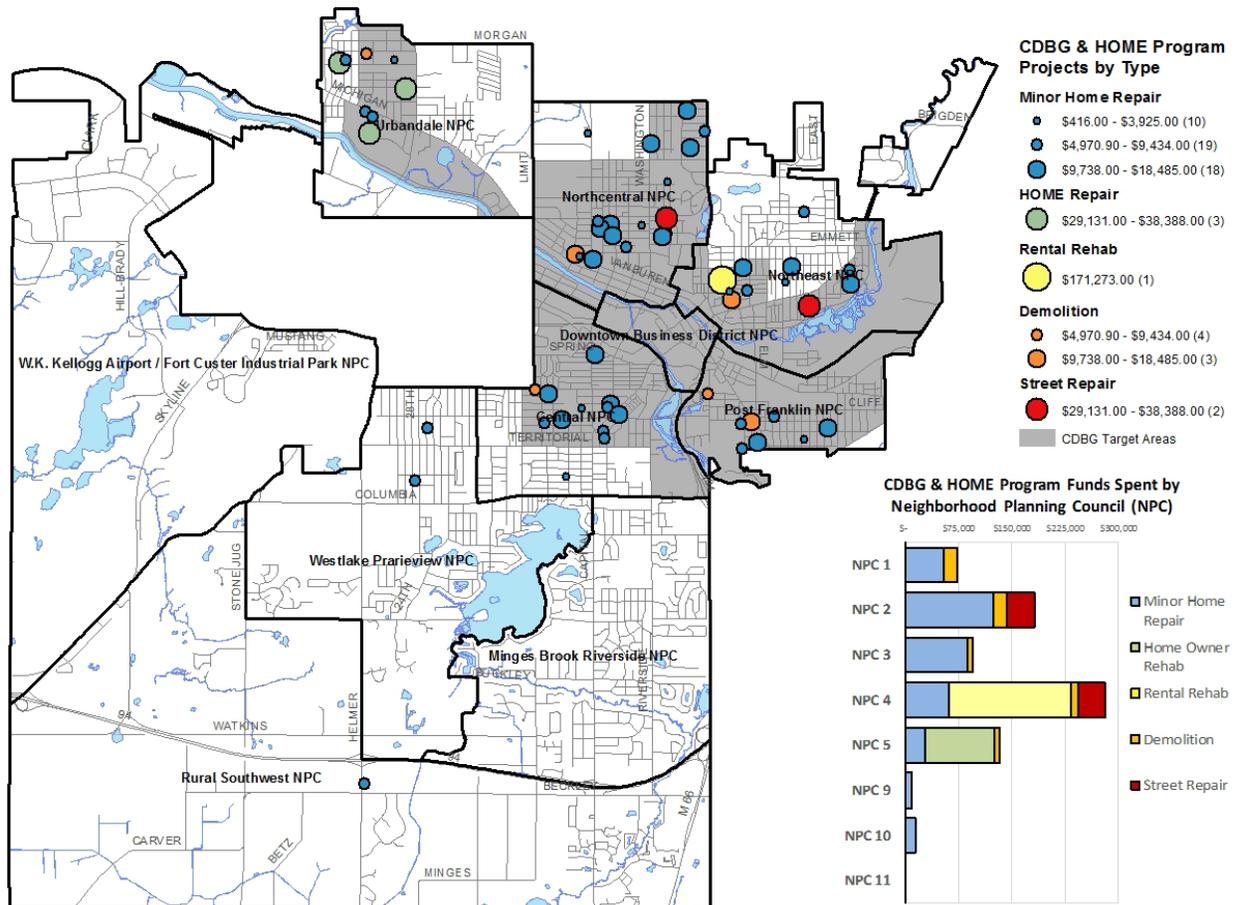
Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation
Fremont/McKinley Revitalization Area	15	34
Fremont/McKinley Revitalization Area	32	34
Northcentral Revitalization Area	16	20
Northcentral Revitalization Area	30	20
Post/Franklin Revitalization Area	12	10
Post/Franklin Revitalization Area	20	10
Urbandale Revitalization Area	15	19
Urbandale Revitalization Area	20	19
Wilson/Coburn Revitalization Area	12	14
Wilson/Coburn Revitalization Area	20	14

Table 4 – Identify the geographic distribution and location of investments

The Northeast target area received the most CDBG and HOME resources, with over half coming from an extensive rehab of a 2-unit rental property on a block that had previously received NSP2 investment. The Northcentral target area received the next highest amount of resources at 20%, mostly due to receiving about one third of the minor home repair program funds.

2015-16 Community Development Target Areas: CDBG and HOME Funded Projects by Type, Amount, and NPC



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, SWMCDC (formerly Neighborhoods Inc.), Community Action Agency, and Summit Pointe, and the CCLBA.

- The City received \$350,721 in NSP2 Program Income funds from MSHDA for acquisition/development/resale of two single-family homes in the NSP2 target area.
- The CCLBA received or completed NSP2 grants totaling \$633,832 and resulting in 48 demolitions within the City of Battle Creek.
- Publicly owned properties (113 N Wabash and 140 N McKinley) were redeveloped and resold as part of the NSP2 Program Income grant from MSHDA
- 253 McKinley was also publicly owned and is included as Match from the CCLBA.
- The City completed demolitions on nine foreclosed, blighted properties using \$250,000 in “Hardest Hit” funds secured through a successful application to the Michigan Blight Elimination Program in 2015.
- The City was awarded another \$99,300 by the State in 2016 to demolish another seven properties in CDBG target areas.
- HUD Continuum of Care funding, administered by the Homeless Coalition of Battle Creek and Calhoun County funded the following programs:

Summit Pointe Housing - Supportive Services Only -Rapid Rehousing - Homeless Housing Assistance Project (HHAP)	42,000
S.A.F.E. Place - Rapid Rehousing Program - Climbing the Ladder to Self-Sufficiency (CLASS)	82,795
The Haven - Transitional Housing Program for Men - Life Recovery Program (LRP)	102,467
The Haven Transitional Housing Program for Families - Women in New Life Program (WIN)	81,537
Summit Pointe - Planning Project 2015	13,874
Total HUD CoC Funding	322,673

- MSHDA Emergency Solutions Grant (ESG) funding, also administered by the Homeless Coalition of Battle Creek and Calhoun County funded the following programs:

Summit Pointe Housing – Homeless Prevention, Rapid Rehousing, ESG Administration (7%), HMIS Administration (3%)	63,579
The Haven - Shelter Operations	13,069
SHARE Center - Street Outreach	35,000
Total ESG Funding	111,648

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	250,129
2. Match contributed during current Federal fiscal year	19,799
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	269,928
4. Match liability for current Federal fiscal year	14,044
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	255,884

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
IDIS Activity ID #643	01/07/2016	1,736	0	0	0	0	0	1,736
IDIS Activity ID #644	06/30/2016	2,063	0	0	0	0	0	2,063
IDIS Activity ID #646	10/01/2015	0	0	16,000	0	0	0	16,000

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	353,351	0	0	0	0	353,351
Number	10	0	0	0	0	10
Sub-Contracts						
Number	2	0	0	0	0	2
Dollar Amount	9,905	0	0	0	0	9,905
	Total	Women Business Enterprises	Male			
Contracts						
Dollar Amount	353,351	0	353,351			
Number	10	0	10			
Sub-Contracts						
Number	2	0	2			
Dollar Amount	9,905	0	9,905			

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	Hispanic	
Number	0	0	0	0	0	0
Cost	0	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	18	9
Number of Non-Homeless households to be provided affordable housing units	42	52
Number of Special-Needs households to be provided affordable housing units	25	3
Total	85	64

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	18	12
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	67	52
Number of households supported through Acquisition of Existing Units	0	0
Total	85	64

Table 12 – Number of Households Supported

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

CDBG-funded Minor Home Repair

The Minor Home Repair program expended all its funds for the program year completing 47 projects, 13 short of its goal. This was the result of projects costing more on average than in previous years, largely due to the high number of roof projects completed. The program will fund up to \$5,000 for the cost of health and safety required repairs, unless the project is to fix a roof which has a higher limit of \$12,000.

HOME-funded Homeowner Rehab (HOR)

Community Action has been a sub-recipient for the HOME program for many years and has a goal of rehabbing 4 homes per year. Since 2013, Community Action has targeted its HOME-funded HOR program

to the Urbandale Neighborhood Planning Council area. This year Community Action worked with City Code Compliance and Community Development staff to recruit low-income homeowners in need of home renovation to apply to the program. Even with letters and phone calls to targeted homeowners, Community Action found it difficult to find homeowners to apply to the program.

During PY 2015, Community Action completed two homeowner rehabs began in PY 2014 and completed one PY 2015 project. Three other projects have been set up and are in the process of rehabilitation. The City has decided to bring the HOR program in house in PY 2016 and will be changing the target area to a designated area in the Washington Heights Neighborhood Planning Council area.

Discuss how these outcomes will impact future annual action plans.

Starting in PY 2016, the City decided to make the Minor Home Repair (MHR) program a no interest, no payment loan program, rather than a grant, in order to provide assistance to at least 60 low- and moderate- income households. It is expected that this change will help bring down the average cost of construction and lead to more households being assisted—an important outcome since the City has over 3,500 households with severe housing problems (per the Consolidated Plan). The MHR loan would be due on sale of the property with some special provisions. Beneficiaries will have the option of being granted the funds if they are able to provide a 1 for 1 match with funds from another source, or if they are able to pay half of the funds back within 5 years, the city will forgive the other half.

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 Persons Served	CDBG Actual	HOME Actual
Extremely Low-income	0	14
Low-income	0	23
Moderate-income	0	27
Total	0	64

Table 13 – Number of Persons Served

Narrative Information

Experience shows that programs directed at serving homeowners and homebuyers tend to benefit low- and moderate-income persons, while programs benefiting renters often serve those with lower incomes those with extremely low- and low-income beneficiaries. This is consistent with historical data from both the CDBG and HOME programs. With the addition of the TBRA program and the redevelopment of a two-unit rental property in 2015-16, this has meant more extremely low-income beneficiaries have been served this year by City programs compared to the previous year.

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 is expanding 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 SPAT. Staff at the Haven and S.A.F.E. Place also engages 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.

There is a need to conduct greater outreach to those living in camps and under bridges and with a funded position for outreach the SHARE Center would do more active outreach to camps.

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 2015, the annual outreach event was hosted at the City's recreation facility, Full Blast and served 517 people in need of housing and services. The next event is being planned for Friday, October 21, 2016 again at Full Blast.

Addressing the emergency shelter and transitional housing needs of homeless persons

While often full to capacity, the City of Battle Creek's inventory of emergency and transitional beds is usually adequate to fill the need of homeless people. 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. 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. The Haven of Rest is seeking funding for a residential substance abuse program for single women and women with children; they have purchased a facility but are seeking ongoing program funding.

Below is an inventory of emergency shelter and transitional housing programs dedicated to helping homeless people in Battle Creek.

Besides the domestic violence shelter run by S.A.F.E. Place, almost all other overnight emergency shelter for men, women and families with children is provided by the Haven. The Haven runs 10 programs. The men's Emergency Shelter provides 38 bunks for single men, age 18 and over, who must not be visibly drunk or high. Services include hot dinner and breakfast, and showers. Case management is provided by a Life Skills Instructor. A wet shelter provides a mat and a blanket, a warm and safe place for people actively drunk or high, or not willing to participate in case management, to sleep from 11:00 pm-6:00 am. The men's Life Recovery Program provides 38-beds of transitional housing focusing on substance abuse treatment and recovery. This structured 12-month program has helped many men recover their lives since it started in 1998. It has a 30% graduation rate, which is good considering the difficult problems with which homeless and addicted men enter the program.

The Haven's Veterans in Progress (VIP) program provides up to 18 shelter beds for homeless veterans for up to six months while male veterans wait to be served by permanent housing at the Silver Star Apartments, HUD-VASH Housing Choice Vouchers or other programs. The VA provides per diem payment to fund this program. The Haven also provides Adult Foster Care in 15 single-room occupancy housing units for single men. The Haven also serves single women and families. InAsMuch House provides 55 beds of emergency shelter for women and families. Case management by life coaches and daycare are provided. The Women in New Life Program is the Haven's scattered site transitional housing program for families with children, 18 beds in six apartments. The Women's Life Recovery Program provides substance abuse treatment for up to 32 single women and women with children at the former Emily Andrus facility. Children's Gain Access Program provides school-aged children with after-school care and the Good News Day Care Center provides licensed child care for 32 children while family members deal with the crisis that has them living in a Haven facility.

Since 1983, S.A.F.E. Place has helped victims of domestic violence and their families in Calhoun, Eaton and Barry Counties by providing shelter and crisis intervention. S.A.F.E. Place provides 56 beds of shelter for women and children in a 16 bed room facility. A HUD funded rapid rehousing program, Climbing the Ladder to Self-Sufficiency (CLASS) provides housing program for six families in scattered site apartments.

There continues to be a shortage of housing case management to help people find and remain stable in permanent housing. There is also a shortage of permanent supportive housing. Transportation also remains a challenge. The shortage of subsidized housing inhibits the implementation of the Rapid Re-Housing and Housing First models. While workers at the Haven and the SHARE Center help connect people to services in the community, there remains a shortage of affordable housing to those with low-incomes. S.A.F.E. Place works with victims recovering from domestic violence who also find housing a difficult piece

of the recovery puzzle.

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 Southwest Michigan Community Development Corporation, 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 and 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

According to HMIS data from 10/1/2014 to 9/30/2015, participating programs (the SHARE Center, the Haven, Summit Pointe Housing and Volunteers of America) sheltered 1,004 unduplicated persons, down from 1,038 the previous year. For persons in emergency shelter, the average length of stay was 26 days

and the median length of stay was 17. Adding transitional housing, makes the average length of stay 52 days and the median length of stay 21 days.

The same HMIS data shows that of the 445 exits from emergency shelter to permanent housing, 24%, or 109 persons, return to homelessness within six months. The percentage of returns to homeless within two years is 37%, or 163 persons. For transitional housing, the number of persons exiting to permanent housing was 67 with 6%, or 4 people returning to homelessness in less than six months. Over a two-year period, 25%, or 17 persons returned to homelessness after being in transitional housing.

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. The City of Battle Creek using HOME funds and partnering with Community Action created a small Tenant-Based Rental Assistance (TBRA) program in 2015.

Homeless Coalition Organizational Assessment

During the 2015 program year, Community Development helped lead an organizational assessment of the Homeless Coalition of Greater Battle Creek and Calhoun County. A four-member assessment team, made up of representatives from member organizations, conducted 14 interviews with coalition organizations using a standardized interview tool. They also reviewed performance measures for the Continuum of Care. Recommendations were made based on the responses that were received, the review of HUD and MSHDA requirements, and the experience of team members.

Below is a summary of the assessment findings. Implementation of the recommendations made by the assessment is still ongoing. The assessment found that:

- Organizations participating in the Homeless Coalition have a rich history of collaborating together on projects.
- The Homeless Coalition is made up of strong, responsive organizations that provide quality help to people in need.
- There is a need to broaden participation in the Homeless Coalition.
- In addition, the Housing Solutions Board needs to expand its membership and evaluate the system of assistance to homeless people.
- There is a lack of understanding amongst participating organizations of the HUD and MSHDA funding process.
- There is a need to increase participation of homeless or formerly homeless representatives in the work of the Homeless Coalition and its various groups – HSB, IST, and other workgroups
- There is a need to define membership for the Coalition.
- Confusion exists about the structure of the homeless coalition; there is a need to define the roles of the different groups that make up the homeless coalition.
- There was support for simplifying and flattening the structure of the Homeless Coalition.
- There is a lack of accountability for the work of the Homeless Coalition and a lack of communication which leads to distrust, low commitment to collaborative work, and lower participation.
- New leadership needs to be recruited.
- Some have questions about conflicts of interest on the Housing Solutions Board.

The recommendations recognized significant opportunities for collaboration:

- There is a lack of community awareness about homelessness. The Homeless Coalition needs to conduct regular outreach to media and engage in a public relations campaign, an opportunity to educate the public while creating an information feedback loop would be to publish an annual report on HMIS and PIT count data.
- Need to improve implementation of HMIS
- Forming an ID Task Force is supported
- Better coordination of housing resources is needed
- Need to develop a formalized referral system
- There is a shortage of supportive housing for chronically homeless individuals
- Outreach efforts needed to engage vulnerable people

Overarching recommendations were to rebuild relationships, create better communications, revise the bylaws of the Homeless Coalition and the Housing Solutions Board, recruit new members and engage in a strategic planning process.

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 51 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 – (51) 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 64 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 2015, the Commission received a \$410,772 grant. In 2016, the Commission expects to receive \$450,141.

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 703 vouchers in Battle Creek, Albion and Portage. The majority of vouchers are in Battle Creek (610). The current waiting list is estimated at 296.

In 2016, the Commission expects to receive \$2,868,205 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.

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 the past year include:

- 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)

There is limited public funding available for community development activities and the problems to be addressed in neighborhoods are complex and numerous. Strategies were based on giving neighborhoods tools to address blight and make rentals safe by funding code compliance, home repair for those who cannot afford to repair their homes, street reconstruction and demolition with CDBG funding. CDBG funding was also used for program delivery costs, public engagement and strategic planning for 20% of the CDBG allocation. 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.

While almost all funded activities occur in low- and moderate-income areas, the unmet need is large. The City has registered 808 vacant buildings; 1,264 people experienced homelessness in 2014; 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 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.

The task force is currently in the process of creating a public report with an action plan for expanding efforts to increase testing of children and to address the issues around lead poisoning throughout the county. The plan will be released at the end of October during lead awareness week.

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 2015-16 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:

- Creation of an ID Task Force to make getting an ID much easier for homeless individuals seeking housing, employment, or benefits.
- Increasing the number of landlords participating in leasing to extremely low-income, homeless or at risk individuals through the Rental Round Table.
- Work began in 2016 on an eviction diversion program to help at risk tenants including poor families maintain their housing and access resources.
- 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 job 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 continues 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 and implementation of Neighborhood Stabilization Program 2 (NSP2) and State of Michigan Hardest Hit Fund grants.
- For the past two program years, 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. In April 2016, the City of Battle Creek certified the Battle Creek Area Habit for Humanity affiliate as a CHDO. The City continues to work with Habitat to become a MSHDA-certified CHDO and to

implement PY 2016 Acquisition/Development/Resale projects.

- The City, SWMCDC, 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. New working groups to coordinate the work of agencies building wheel chair ramps, collaborate in doing outreach to local and MBE/WBE contractors, 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 promote the values of being a Beacon Community, by using the Harwood methodology to gather extensive community input through “community conversations” on a number of hot button issues. The City continued to work closely with partners in engaging citizens, inviting the CCLBA to be co-facilitators of many of the needs workshops held in preparation for the Annual Action Plan, 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)

Lender Outreach and Consultation

Community Development staff meet with Community Reinvestment staff and loan officers from Fifth Bank and Chemical Bank to learn about the mortgage loan market in Battle Creek and evaluate if there was any interest in a loan guarantee program for home improvement loans to low to moderate-income homeowners. Neither bank was interested in participating in a loan guarantee program. Valuable information was shared in these sessions. Chemical Bank works with homeowners on a credit repair program, the Retail Sales Manager serves on the Board of SWMCDC and encouraged Community Development to become familiar with the Federal Home Loan Banks of Indianapolis' low income rehab programs.

Fifth Third Bank discussed with success with the FHA 203(k) Streamline home renovation mortgages and their Express Banking program doing outreach to households not used to using a bank for financial services. Discussion of the difficulty making home loans in many Battle Creek core neighborhoods because of low appraisal home values.

Rental Property Owners Outreach

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; and,
- 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 were held in August and September 2015 to establish the effort and now are organized quarterly. The events connect rental property owners to tenants, service providers and rental assistance.

Type of Attendee	8/13/2015	9/17/2015	1/27/2016	4/19/2016	7/26/2016
Landlords/Property Managers	18	25	33	25	23
Service Providers	21	25	16	10	18
Total Attendance	39	50	49	35	41

Table 14 - Attendance Statistics for the Rental Property Owners Outreach

The topics for discussion at the Landlord Dinner and Discussions have been:

8/13/2015 – Panel discussion on available assisted affordable housing and supportive services with the Haven’s InAsMuch House; utility assistance available to tenants through Community Action and Salvation Army; Summit Pointe’s housing assistance programs and the Battle Creek Housing Commission’s Housing Choice Voucher Program.

9/17/2015 – Panel discussion on available housing services with Community Action’s weatherization program; the City of Battle Creek rental registration and code compliance, the Fair Housing Center reviewed fair housing law; State-funded Housing Choice Vouchers available through MSHDA’s regional contractor; and Financial Education available from Southwest Michigan Community Development Corporation.

1/27/2016 - Legal Services on landlord-tenant law and lease issues

4/19/2016 - Fair Housing Law by the Fair Housing Center

7/26/2016- Panel discussion on utilities and available utility assistance with the City of Battle Creek utility billing; available utility assistance from TrueNorth, Salvation Army and Community Action; and low-income assistance program managers from SEMCO and Consumers Energy.

Sessions planned for the future include:

9/29/2016 - Bedbugs: The Problem, The Treatment and The Law

Participating organizations:

The Haven

Salvation Army

Summit Pointe Housing

Community Action

Legal Services of South Central Michigan

United Way

City of Battle Creek Community Development

The Fair Housing Center

Southwest Michigan Community Development Corporation

The SHARE Center

S.A.F.E. Place

Meals have been sponsored by Meijer, Walmart, the Battle Creek Community Foundation, the Battle Creek Housing Commission and participating organizations.

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 to do four fair housing trainings during the 2015-16 program year. The Fair Housing Center provided an additional four training opportunities and a conference that were attended by Battle Creek residents and agencies.

The City also reconstituted its 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 also reviews and advises on fair housing issues and the results of systemic investigations. A representative from Community Development attends all meetings.

Lastly, the City contracted with the Fair Housing Center of Southwest Michigan to conduct three systemic housing investigations during the 2015-16 program year. A systemic housing investigation is an investigation of alleged discrimination that is pervasive or institutional in nature, or where the collection and analysis of data to develop a complaint will involve complex issues, novel questions of fact or law, or will potentially affect a large number of persons. The three systemic investigations focus on real estate agents and race discrimination, individual landlord investors and race discrimination, and companion animal acceptance.

Real Estate Agents and Race Discrimination Investigation

In partnership with the City of Battle Creek, Fair Housing Center of Southwest Michigan conducted a real estate sales systemic housing investigation to assess the quality of information generated, the locations provided, and the potential for steering in the Battle Creek housing market on the basis of race.

All real estate tests for this systemic investigation utilized a match-pair methodology with testers trained through a HUD-approved process—two test parts are assigned to one site, one test part consisting of a protected tester (a Black tester); and one test part consisting of a comparison tester (White). Both testers were assigned to contact the real estate agent and inquire about real estate availability. The purpose of these paired tests was to determine whether comparably qualified White and Black prospective real estate customers receive the same information, service, treatment, and access to available real estate listings.

The following findings are derived from 38 tests, or 19 matched pairs:

- A pattern of differences was found in the information, service, treatment, and access to available real estate listings.
- White testers were more likely than Black testers to receive a response from agents.
- White testers received more listings than Black testers.
- Agents discussed preferred specifications without prompting, such as neighborhoods and schools, more often with White testers than they did with Black testers.
- Agents discussed qualifications, such as pre-approval, more often with Black testers than they did with White testers.
- Most of the time, individual agencies did not offer the same listings to comparably qualified Black and White testers.
- Listings for White testers covered a larger geographic area.
- The most likely properties to be offered to Black testers, on average, possessed a larger lot size, younger age of home, but less equity, than properties most likely to be offered to White testers.

Individual Landlord Investors and Race Discrimination

In partnership with the City of Battle Creek, the Center conducted an investigation to assess the quality of information generated, the availability of units, and the potential for steering in the Battle Creek rental housing market on the basis of race.

The purpose of this investigation was to determine the treatment of African-Americans regarding information shared about available units and level of service provided by individual landlords operating

in the City. For the purpose of this investigation, an individual landlord was defined as an entity leasing scattered site single-family homes or a property with between two and ten units. This is in contrast to complexes or apartment communities—types of properties that are easier to test because of size and availability of units and have been tested regularly in the past.

The following findings were derived from 30 tests, or 15 matched pairs:

- Black and White testers alike seemed to have equally difficult experiences when it came to testing units with a lower price-point. Of these:
 - Both Black and White testers had great difficulty meeting with agents face-to-face, generally due to an absent agent, no return phone call, or extensive requirements. In most cases where testers were able to meet with an agent, testers reported that the available unit was substandard with deteriorating components, broken windows, and without common amenities (fridge/stove).
 - Both test parts were occasionally subjected to criminal background checks from the first point of contact.
- Expensive rentals revealed no notable difference in treatment.
- Additionally, 14 advertised but uncertified rental units were discovered through this investigation and reported to the City's Code Compliance Division.

Companion Animal Acceptance Investigation

In partnership with the City of Battle Creek, the Center conducted an investigation to review the response of housing providers when confronted with a reasonable accommodation request for a companion animal from person with a disability. Under the fair housing laws, people with disabilities are entitled to receive changes in policies or procedures to adapt to the person's individualized need.

The primary tool for this investigation was 28 single tests. A single test means an undisclosed housing investigation involving one person who initiates contact with another person or entity for the purpose of examining how members and non-members of a protected class are treated. A tester calls an agent in Battle Creek and inquires about the availability of units. Then the tester discloses his/her disability status by stating he or she has a companion animal. The purpose of these 28 tests was to determine whether people with disabilities receive different services, treatment, and access to available rental housing based on a disclosure of disability status.

The following findings were derived from 28 tests:

- Rental agents in Battle Creek have varying degrees of fair housing knowledge related to people with disabilities.
- The biggest obstacle in the Battle Creek housing market for people with companion animals was the denial of housing based on their need for an accommodation.
- 10 out of 28 agents denied housing to tester after disclosure of disability status. Half of those denials were due to a no pet policy. The other half were due to a species or breed restriction policy.
- 3 out of 28 agents offered fewer properties based on the species or breed of animal.
- 4 of 28 agents applied different terms and conditions to tester with companion animal in the form of a pet fee.

- 9 of 28 agents stated that tester would need to prove their need for a companion animal. Three agents asked if tester had documentation. Three agents asked if animal was state certified. Two stated tester would need a doctor's note. One stated tester would need to make a 504 request. Only two of the nine agents asking for proof stated how and when an applicant would need to provide that information.
- 7 of 28 agents showed no signs of discrimination after disclosure of disability status.

Follow Up Activities

The City intends to work with the Fair Housing Center, the Human Relations Board, and other community stakeholders to develop a plan for addressing the issues raised by the systemic investigations. Additional trainings and investigation activities are planned for the 2016-17 program year.

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

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 September 9, 2016 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 will hold a public hearing on Tuesday, September 20, 2016, at 7:00 p.m. in the City Commission Chambers, Room 301, City Hall, 10 North Division Street for the purposes of hearing public comment on the Consolidated Annual Performance Evaluation Report (CAPER).

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 complete a performance report detailing the progress of the Community Development Block Grant and HOME Investment Partnership programs. This report, called the CAPER, must be available for public comment for at least 15 days.

A copy of the CAPER will be available from Thursday, September 8, 2016, through Thursday, September 22, 2016, in the City's Community Development Division during normal business hours for public review and online at www.battlecreekmi.gov/183. The Community Development Division is located in City Hall, 10 North Division Street, Room 117. Citizens wishing to make comments may do so either at the public hearing or in writing to: Mr. Chris Lussier, Community Development Manager, Community Development Division, 10 North Division Street, Room 117, Battle Creek, MI 49014.

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.

Outside of the consolidation of the priority needs areas, which is described in the in the goals and outcomes section of this report no changes in the City's program objectives is planned. Changes to the TBRA and Minor Home Repair programs, detailed in the affordable housing section, are the only changes planned for the upcoming year. A new rental rehab program is planned for 2016-17, but this was anticipated for in the City's 2015-19 Consolidated Plan.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?	No
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[BEDI grantees] Describe accomplishments and program outcomes during the last year.

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.

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, an experienced contractor for rehab projects and a former Code Compliance official, 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.

Here is a summary of the inspections made and any issues on the HOME funded projects completed in Program Year 2015-2016:

Community Action Homeowner Rehab

76 Avery – Three inspections, no issues raised.

37 Spaulding – Community Action neglected to schedule a mid-construction inspection, this was noted in their annual program review/monitoring. Pre-construction and final inspections were made.

58 N Cedar – Three inspections, no issues raised.

HOME-funded Rental Rehab

94-96 Harvard – Three inspections, no issues raised.

CHDO Assisted Rental Rehab Projects

34 Jordan (affordability period ended 2/23016) - Registered rental, inspected on site every three years.

18 N Wabash Avenue – Registered rental, inspected on site every three years.

66 Harvard Street - A final inspection of this property determined that a lead clearance had not been completed. The nonprofit developer was unable to rent the property or complete financial draws until the lead clearance was completed and a clear final inspection was made. Currently this is a registered rental and it will be inspected on site every three years.

CHDO Assisted ADR

20 Rose – At the final inspection for this property, the nonprofit developer provided a Lead Risk Assessment/Inspection Report that showed that a window well had tested positive for lead. The property was not approved until it had been cleared of all lead dust hazards and a lead clearance report was provided. A final inspection cleared the property on March 19, 2015.

TBRA

12 units of housing were assisted with TBRA. All 12 units received HQS inspections. If violations were found, these conditions had to be fixed before any TBRA assistance was issued.

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. Except for the Rental Rehab of 94-96 Harvard which was a duplex, 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

No HOME funded projects completed during the 2015-2016 Program Year generated program income.

During the Program Year an ADR project, 70 S Mason, completed in 5/21/2012, generated \$504.66 in repaid homebuyer funds that were recaptured when a qualified homebuyer moved out of the ADR project in late 2013 and rented the property for income. The City reprogrammed these repaid homebuyer funds into a HOR project. The nonprofit CHDO enforced the mortgage agreement by obtaining a legal judgement against the original homeowner and garnishing her wages. When the homeowner kept switching jobs it was found to not be cost effective to continue to pay legal fees to continue with the wage garnishment. The home was foreclosed on by Fifth-Third Mortgage Company on 7/3/2014, and the City terminated the affordability restrictions because of the foreclosure which resulted in the transfer of the property with no proceeds inuring to the benefit of the beneficiary.

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 has encouraged Battle Creek Area Habitat for Humanity to become a HOME-funded Community Housing Development Organization (CHDO) to encourage their production of affordable housing.