



# **2020 Consolidated Annual Performance and Evaluation Report (CAPER)**

**DRAFT**

City of Benton Harbor  
Community & Economic Development  
200 E. Wall Street  
Benton Harbor, MI 40922

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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 Benton Harbor is an entitlement city, receiving an annual allocation of Community Development Block Grant (CDBG) program funds through the U.S. Department of Housing and Urban Development (HUD). These funds help the City address the housing and community development objectives outlined by HUD, which include, but are not limited to: affirmatively furthering fair housing, affordable housing preservation, infrastructure improvements, and vital services for special needs and low- to moderate-income (LMI) populations.

The City of Benton Harbor's lead responsible department for administration of CDBG funds is the City Community & Economic Development Department (CEDD). The City has continued to experience significant turnover in key positions in the CEDD over the past several years, which resulted in lower spending of program funds than anticipated. In the program year two positions were filled, including the Director, which will bring stability to the program. The City's 2020 AAP was approved in May of 2021 and the City has been working diligently to start PY 2020 activities before the end of program year. Below are the accomplishments for the program year.

**Provide for Economic Development Activities:** The City was able to implement a project to provide for economic development activities in the Summer Youth Work Program. This program served a total of 65 LMI persons. The program employs 58 youth and 7 supervisors for summer maintenance employment in neighborhoods and in City Parks. The activities conducted under supervision were sweeping and cleaning gutters along streets with leaves and debris, picking up paper and trash along streets and lots, cleaning up and maintaining the cleanliness of parks, emptying trash receptacles, raking and sweeping, and whatever was necessary to improve the appearance of the City and its facilities.

**Assist Home Owners with Needed Repairs:** The City also continues to provide rehab program admin for the Southwest Michigan Community Action Agency (SMCAA) to assist homeowner households with housing rehab, however there were no rehab activities completed due to COVID-19 in PY 2020. The SMCAA Home Rehab Loan Program activity remains open and was funded in 2019 however, no work has been taking place for any of the prior year grants in PY 2020. When rehab activities start again, the City anticipates to report accomplishments in the next CAPER.

**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
Assist Home Owners with Needed Repairs	Affordable Housing	CDBG: \$91160	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		4	0	0.00%
Assist Home Owners with Needed Repairs	Affordable Housing	CDBG: \$91160	Rental units rehabilitated	Household Housing Unit	0	0		3	0	0.00%
Assist Home Owners with Needed Repairs	Affordable Housing	CDBG: \$91160	Homeowner Housing Rehabilitated	Household Housing Unit	80	0	0.00%	10	0	0.00%
Homebuyer Assistance	Affordable Housing	CDBG: \$	Direct Financial Assistance to Homebuyers	Households Assisted	2	0	0.00%			
Improve Public Facilities & Infrastructure	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2500	0	0.00%			
Improve Public Facilities & Infrastructure	Non-Housing Community Development		Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	500	0	0.00%			

Increase Capacity of Area Service Providers	Non-Housing Community Development		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1500	0	0.00%			
Increase Capacity of Area Service Providers	Non-Housing Community Development		Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	500	0	0.00%			
Promote Fair Housing	Affordable Housing	CDBG: \$50000	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	1500	0	0.00%			
Promote Fair Housing	Affordable Housing	CDBG: \$50000	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	0	0		10	0	0.00%
Promote Fair Housing	Affordable Housing	CDBG: \$50000	Homeless Person Overnight Shelter	Persons Assisted	0	0		20	0	0.00%
Promote Fair Housing	Affordable Housing	CDBG: \$50000	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0		15	0	0.00%
Promote Fair Housing	Affordable Housing	CDBG: \$50000	Homelessness Prevention	Persons Assisted	0	0		20	0	0.00%
Provide for Economic Development Activities	Non-Housing Community Development	CDBG: \$200000	Jobs created/retained	Jobs	25	65	260.00%	40	65	162.50%
Provide for Economic Development Activities	Non-Housing Community Development	CDBG: \$200000	Businesses assisted	Businesses Assisted	5	0	0.00%			

Reduce Hazards in Homes	Affordable Housing		Homeowner Housing Rehabilitated	Household Housing Unit	80	0	0.00%			
Reduce Hazards in Homes	Affordable Housing		Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	500	0	0.00%			
Reduce Vacancy and Blight	Affordable Housing		Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	500	0	0.00%			

**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's of Benton Harbor's 2020 AAP was only recently approved in the Spring of 2021 and the City's CEDD staff has been working diligently to implement the activities identified in its plan. CEDD Staff was able to start some activities and also completed a goal for providing economic development activities. This youth employment program was an economic development public service designed to give many unemployed youth some gainful employment over the summer. These activities involved training as well as experience that will provide lasting benefit to them in the future. This goal addressed one of the highest needs in the City, which is Provide for Economic Development Activities.

Also in PY 2020, the City continued to work with Southwest Michigan Community Action Agency (SMCAA) to assist homeowner households with housing rehab. The SMCAA operates a weatherization program to help homeowners make energy-efficient repairs to their homes, and the City provides rehab program admin for these projects. Unfortunately in the program year, there were no rehab activities completed with the SMCAA, but this goal remains a high priority. Housing rehab addresses one of the highest needs in the City, which is Providing Suitable Living Environments.

*Goals Accomplished against Goal Outcome Estimates in PY 2020*

Assist Home Owners with Needed Repairs: The City had a goal to assist 3 LMI rental-occupied households 10 LMI owner-occupied households with housing rehab, however in the program year there were no activities completed. As mentioned above, the City worked with SMCAA in the program year to provide rehab activities however there were no rehab activities completed with the SMCAA. Benton Harbor CEDD staff and the SMCAA will work to identify eligible households for these services.

Homeless Services: The City had several goals as identified in the Goals and Outcomes table above, however the City has not been able to work with homeless shelter services to complete these activities. The City is still evaluating partnerships and services available by homeless service providers to complete these goals while avoiding duplicating services.

Provide for Economic Development Activities: The City had a goal to assist 40 LMI persons with the Summer Youth Employment Project and assisted 65 total LMI persons (58 youth and 7 supervisors).

## 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
White	0
Black or African American	63
Asian	0
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
<b>Total</b>	<b>63</b>
Hispanic	2
Not Hispanic	63

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

### Narrative

DATA NOTE: The table above does not include a category for people that identify as “other” or “multiple races” nor does it include a category for activities that have a “low/mod area-wide benefit” which are often times associated with public facility or infrastructure improvements. Due to this, the racial or ethnic data in the above table does not necessarily match the numbers of people groups actually served by the CDBG program. The City actually assisted a total of 65 persons, however without the “other race” row, the total only shows 63 assisted.

For activities that the City was able to record race/ethnic information, 98% of CDBG funding went towards assisting Black or African Americans. The remaining 2% went towards assisting persons that identified as Hispanic. This activity was from the Summer Youth Employment Project.

According to the most recent 2015-2019 American Community Survey 5-Year Estimates, 84.7% of the population was Black, followed by 12.2% for Whites and 2.8% for “Two or more races”. Persons who identified ethnically as Hispanic were 5.4% of the citywide population. CDBG funds went to assist minority populations and were generally in line with the composition of the City’s race/ethnic population .

### Needs Assessment

The Needs Assessment in the City’s Consolidated Plan, assesses if any racial and ethnic group by income category has a disproportionate need in the area with regards to housing problems, severe housing problems and cost burden. Households with housing problems are those that reside in units lacking complete kitchen and plumbing facilities as well as overcrowding (more than one person per room) and cost burden (spending 30% or more of income on housing per month). Households with “severe housing problems” are those that reside in units lacking complete kitchen and plumbing facilities as well as



severely overcrowded homes (more than 1.5 person per room) and severe cost burden (spending 50% or more of income on housing per month).

The Needs Assessment sections NA-15, NA-20 and the NA-25 from the 2016-2020 Consolidated Plan report that there are White, Asian, and Hispanic households that have a disproportionate need in households problems, however these race/ethnic groups are very small. The vast majority of the population are Black households, and due to this does not show a disproportionate need as compared to the whole population. In general, housing problems exist in the City and the largest housing problem by far is housing cost burden. LMI households are much less likely to be able to afford housing and the cost of housing rehab for conditions that may lead to housing instability and homelessness. The City as a result will work to assist all LMI households with housing rehab, and as the majority of the population is Black, it is assumed that the majority of households assisted through City programs will be Black households. While the City continues to work with the Southwest Michigan Community Action Agency on housing rehab, there were no housing rehab activities completed.

## CR-15 - Resources and Investments 91.520(a)

### Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	426,449	104,093

Table 3 - Resources Made Available

### Narrative

In PY 2020 the City had resources made available with \$426,449 in CDBG EN funds. According to the PR-07, the City expended \$104,093 in PY 2020. Funds were from previous grant years 2017 and 2018, and also the current 2020 program year. Expenditures included funds for housing rehab activities and program administration.

The City anticipated to use \$1,541,041 in prior year resources however these were not programmed into the projects, and therefore the City has not made these resources available in the program year. The City's CEDD is currently working on large projects to spend down these funds towards identified needs in Benton Harbor.

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
N/A	N/A	N/A	N/A

Table 4 – Identify the geographic distribution and location of investments

### Narrative

The City concentrates its CDBG funding throughout the City, excluding the Harbor Shores community, which is a newly constructed, upscale, community located in the City's northwest side, surrounding Jean Clock Park and the Harbor Shores Golf Course.

Neighborhoods and commercial areas throughout the City are in need of investment. Through the Consolidated Plan process, the City has not decided to concentrate its CDBG investments in any particular area but, instead, chooses to allocate its funds on activities that would seem to benefit the most people.

## Leveraging

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

The City used CDBG funds to leverage funding from the City of Benton Harbor's newly enacted City Income Tax, to provide infrastructure improvements in the community. The City also had CDBG funds reserved for its home rehabilitation loan program to leverage funding from the Southwest Michigan Community Action Agency (SMCAA) to weatherize homes in the program.

### *Publicly Owned Land or Property Located Within Benton Harbor to Address the Needs in the Plan*

The City's use of publicly owned land or property located within the jurisdiction to address the needs in the plan involved improvements to sidewalks through the Sidewalk Replacement program. Targets include city-owned streets and sidewalks in low/mod block group tracts in Benton Harbor, and specific streets and sidewalks are identified each year of the Consolidated Plan. According to HUD's CDBG Low Mod Income Summary Data (LMISD), the Low/Mod Block Group Tracts are: 0003001, 0003002, 0004001, 0004002, 0005001, 0006001, 0006002, 0022002, 0023002, and 0025002. Recently, the City made improvements to the Buss and Sickle Street areas in the low/mod block group tract 260210003001.

The City also uses public parks for providing economic development activities. This youth employment project was an economic development public service designed to give many unemployed youth some gainful employment over the summer that also involved training as well as experience that will provide lasting benefit to them in the future. This goal addressed one of the highest needs in the City, which is Provide for Economic Development Activities.

## 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	7	0
Number of Non-Homeless households to be provided affordable housing units	3	0
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>10</b>	<b>0</b>

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	10	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	6	0
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>16</b>	<b>0</b>

Table 6 – Number of Households Supported

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

There were no affordable housing activities completed in PY 2020. Unfortunately, the City has experienced turnover in key positions in the CEDD over the past several years, which resulted in lower program accomplishments than anticipated. However, two positions were recently filled, including the Director, which is bringing stability to the department and the program. CEDD staff are engaged with HUD representatives at this time. Affordable housing preservation remains a high priority and the City CEDD will continue to identify households in need of housing rehab services.

CEDD staff has continued to work with Southwest Michigan Community Action Agency (SMCAA) to assist homeowner households with housing rehab. The SMCAA operates a weatherization program to help homeowners make energy-efficient repairs to their homes, and the City provides rehab program admin for these projects. While there were no rehab activities completed with the SMCAA in the program year,

the City continues to have the Home Rehab Loan Program open (Activity #186) and anticipates to have accomplishments when this program restarts.

The City also had a goal to work with homeless service providers to help with rental assistance in PY 2020, however no activities were completed. This was also partly due to the staffing issues mentioned above and a delay in engaging directly with service providers. The City will work to identify homeless service providers that will be able to manage and facilitate these activities.

**Discuss how these outcomes will impact future annual action plans.**

The City of Benton Harbor’s CEDD recognizes the need for additional housing rehabilitation assistance for our LMI residents, and plans to continue funding this activity in the future. The need for housing rehab with LMI residents is necessary as LMI households lack the funds to properly upkeep their homes which may promote unsafe conditions which may ultimately lead to homelessness. The goal of affordable housing programs and housing rehab activities are to help low-income households avoid homelessness and improve their quality of life in Benton Harbor.

The City’s CEDD will also work to identify homeless service providers that will be able to manage and facilitate rental assistance services. They City anticipates to implement these activities and report accomplishments in future reports.

**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.**

<b>Number of Households Served</b>	<b>CDBG Actual</b>
Extremely Low-income	0
Low-income	0
Moderate-income	0
<b>Total</b>	<b>0</b>

**Table 7 – Number of Households Served**

**Narrative Information**

As mentioned above, there were no affordable housing activities completed in PY 2020. The City’s CEDD will work to identify low- to moderate-income households for its housing rehab programs and make this a priority in future plans.

*Worst Case Needs*

Worst case needs are extremely low-income households that are at imminent risk of homelessness and are in need of affordable housing or emergency assistance. These activities can include housing rehab for extremely low-income households. Households with extremely low-incomes lack the funds to properly

upkeep their homes which may promote unsafe conditions and contribute to situations that lead to homelessness. The City's housing rehab programs are available to all LMI households and not necessarily targeted towards extremely low-income households, however they are encouraged to apply for assistance.

The City did not specifically report any persons with a disability in affordable housing programs, however if a household with a disability is identified for assistance in one of the housing programs, the City will make all necessary accommodations within reason to meet the needs of the household.

## **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**

The City of Benton Harbor does not provide direct homelessness services. Instead, the City maintains relationships with the Housing Resource Network and its member agencies that service this population. The Housing Resource Network is a community group made up of representatives from local non-profits, which actively works to prevent and end homelessness and poverty by developing and maintaining a system to coordinate the community's resources and services for people experiencing homelessness and those that are precariously housed. The Benton County Housing Resource Network is a primary resource for homeless needs in the City and County.

The City also maintains relationships with several shelters for the homeless in Benton Harbor, which are Emergency Shelter Services, the Salvation Army and Child & the Family Services of Southwestern Michigan Safe Shelter for Domestic Violence. See below on more details about the homeless shelters in Benton Harbor.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

As mentioned above, the City of Benton Harbor does not provide emergency shelter or transitional housing for homeless persons. Instead the City maintains relationships with the shelters, the HRN and its membership agencies that service this population. The shelters in Benton Harbor include:

1. Emergency Shelter Services: ESS provides street outreach, a homeless shelter facility, homelessness prevention and rapid rehousing services to individuals and families that are no income, low income, homeless and at risk of becoming homeless. The City CEDD recognizes ESS as an important service provider in the area and will identify ways to work with ESS in the future.
2. Child & Family Services of Southwestern Michigan, Inc. - Safe Shelter for Domestic Violence: The Safe Shelter for Domestic Violence provides a secure, violence free environment for survivors of intimate partner domestic violence and sexual assault along with their dependent children. Support services offered include shelter, counseling and support groups, assistance with basic needs, a crisis hotline, and access to other resources needed to develop safe, healthy and meaningful lives for victims of domestic violence and their children.
3. The Benton Harbor Salvation Army provides an emergency shelter, addiction assistance, ministerial services, disaster relief, and family and youth services to the community.

### **Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being**

**discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

The City of Benton Harbor does not directly assist homeless persons but instead, maintains a relationship with the HRN and its member agencies that assist homeless individuals with services that work to meet the homeless population's unique needs. The HRN is a community group, which actively works to prevent and end homelessness and poverty by developing and maintaining a system to coordinate the local community resources and services for homelessness and individuals and families that are not homeless, but are at-risk of homelessness. Some of these member agencies include the homeless shelters, the United Way of Southwest Michigan and Berrien County. Through this network, the HRN is able to provide all types of individuals or families a variety of assistance such as housing needs, health referrals, job training and education.

The statewide Michigan Interagency Council on Homelessness Continuum of Care will help coordinate effectively with mainstream service providers for families at risk of becoming homeless or from returning to homelessness after they have been discharged from previous care. The CoC has a Campaign to End Homelessness website online where information could be passed, and referrals to resources such as health, housing and employment services could be made. The website can be found at: <https://www.michigan.gov/mcteh>

The BHHC provides assistance to public housing residents in avoiding homelessness. The City will continue to support the BHHC on projects such as the economic self-sufficiency program that will help public housing residents avoid becoming homeless, and possibly even move them closer to stable housing such as homeownership.

Elderly: Food bank programs and meal services from Soup Kitchen Inc, and Southwest Gleaners Food Bank help to provide food which can help offset housing costs and leave more income for low-income elderly. InterCare is a health agency that provides medical services to all persons in the area including the elderly and persons with a disability and has a sliding fee program to assist LMI households.

Persons with a Disability: Referrals are made for persons with a disability needing financial assistance through the Southwest Michigan Community Action Agency. Activities include referrals to local programs and direct cash assistance for eligible persons. The Salvation Army and Berrien County also provide referrals that may provide utility assistance, clothing, personal needs, and disaster relief. Food bank programs and meal services from Soup Kitchen Inc, and Southwest Gleaners Food Bank help to provide food which can help offset housing costs and leave more income for low-income persons with a disability. InterCare is a health agency that provides medical services to all persons in the area including persons with a disability and has a sliding fee program to assist LMI households.



Persons with HIV/AIDS and their families: The primary service agency for assisting persons with HIV/AIDS and their families in Benton Harbor is the Berrien County Health Department, which provide HIV services and tests. The department however relies on community referrals for housing needs. Housing assistance for HIV/AIDS persons in need can contact the AIDS Ministry/AIDS Assist which currently operates four different housing programs: ESG, Transitional Supportive Housing, HOPWA Supportive Services (w/ rental assistance), and Permanent Supportive Housing. CARES of SW MI provides a variety of HIV/AIDS assistive services including case management, testing, prevention and other resources.

**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**

The City of Benton Harbor does not directly assist homeless persons but instead, maintains a relationship with the HRN and its member agencies that assist homeless individuals make the transition to permanent housing and independent living.

Initiatives through the regional and statewide CoC benefit homeless persons in the area seeking permanent housing. One of these programs is the CoC Permanent Supportive Housing (PSH) program.

The CoC offers supportive housing as a combination of housing and services intended as a cost-effective way to help people live more stable, productive lives.

Supportive housing is widely believed to work well for those who face the most complex challenges – individuals and families with extremely low incomes, and who either meet the HUD definition of homeless or who have special needs.

Supportive housing can be coupled with such social services as job training, life skills training, alcohol and drug abuse programs and case management to populations in need of assistance. Supportive housing helps people recover and succeed while reducing the overall cost of care, and services are flexible and primarily focused on the outcome of housing stability.

Throughout the state there are over 2,500 housing units targeted for supportive housing tenants. The eligibility for supportive housing is determined by a local lead service agency and the management company for each property. These apartments and homes have been provided with a federal or state subsidy to make the unit affordable to residents with incomes at or below the 30 percent area median income for that county. Benton Harbor is located in region 8, which is the Southwest Michigan service area.

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

### **Actions taken to address the needs of public housing**

The City of Benton Harbor's public housing needs is served by the Benton Harbor Housing Commission (BHHC), and the City CEDD continues to meet with the BHHC to address and improve the lives of public housing residents. The BHHC continues to work to provide safe, decent, and sanitary housing to low- and very low-income families in Benton Harbor. The BHHC owns and operates 370 Public Housing (PH) units and administers over 200 Housing Choice Vouchers (HCVs).

The City continues to benefit from recent public improvements made surrounding BHHC public housing developments. In the prior program year, the City made infrastructure improvements around the Buss Apartment public housing complex. These activities included removing obstructions to the street, spot curb repair and replacement, storm sewer improvements and installation of sidewalk ramps. There are currently no new projects in development or being planned.

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

The City of Benton Harbor continues to partner with the Benton Harbor Housing Commission to support their work in resident engagement and education. The Benton Harbor Housing Commission encourages public housing residents to participate in activities and planning of programs for residents. For this purpose, the BHHC works with residents in the Resident Advisory Board (RAB). The RAB acts as an intermediary between residents and building management. The BHHC coordinates programs for its residents and connects them to organizations that focus on self-sufficiency.

The BHHC also has an Economic Self-Sufficiency Program which is designed to encourage, assist, train and facilitate economic independence of publicly assisted families and/or help provide work for families. Activities in the program include job readiness or job training, training through career centers and workforce investment boards, employment counseling and work placement, higher education and other financial/literary classes, apprenticeships, budget and credit counseling, and any other programs necessary to ready a participant for work. Providing income is a major need for BHHC residents and the lack of income is a primary obstacle to gaining homeownership. Through this program, BHHC affordable housing participants can become economically self-sustainable and take the steps necessary to participate in homeownership.

### **Actions taken to provide assistance to troubled PHAs**

Not applicable. The PHA is not designated as "troubled." In 2013, the BHHC was removed from the troubled housing agency list with HUD.

## **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 Benton Harbor is in the process of completing its Analysis of Impediments to Fair Housing Choice (AI) which will help to identify the barriers and impediments to fair housing choice and affordable housing in the City. The AI will assist stakeholders and partners with a better understanding the barriers to Fair Housing and inform the actions needed to be taken by the City of Benton Harbor to address said barriers. A public hearing has been scheduled in the following program year for the City Commission to review and discuss the AI. Currently, the number one impediment to fair housing in Benton Harbor is the lack of available suitable housing in all categories. In Benton Harbor, most of the housing is rental, and approximately only 20% is homeowner housing of which most of it is also owned by seniors that have been living in the City for years. The information from the AI will help the City back up it's funding requests.

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

The City will continue to focus on strengthening relationships with area public services providers to identify and address any obstacles to meeting underserved needs. This will include such actions as city staff attendance at monthly Housing Resource Network meetings, enhancing the participation of local public service agencies in the CDBG Annual Plan process by notifying agencies directly about public meetings and sending out a survey during the planning process to assess what the underserved needs are and recommended ways to address them, and consider reserving CDBG funds to fund public service agencies.

Among the local social and housing organizations the City's CEDD will work with are the Berrien County Housing Resource Network Continuum of Care, Berrien County Health Department, Berrien County Human Service Coordinating Council and the Benton Harbor Housing Commission to name a few.

Economic development activities such as the youth employment program, is an economic development public service designed to give many unemployed youth some gainful employment over the summer that also involved training as well as experience that will provide lasting benefit to them in the future. These activities had a benefit to a total of 65 LMI persons (58 youth and 7 supervisors) in the program year. Through these activities, the City hopes to improve the quality of life of residents in Benton Harbor.

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

The City CEDD continues to address lead based paint (LBP) hazards through all related housing activity especially the Home Loan Rehab Program. The City continued to test and address lead-based paint hazards

found in participating homes. The City's policy on addressing lead-based paint is focused on abatement, as opposed to using temporary measures.

Households that have been identified to be exposed to LBP hazards were referred to the Berrien County Health Department (BCHD) and the Childhood Lead Poisoning Prevention program. BCHD has a webpage dedicated to information on LBP hazards and how to prevent lead poisoning. Professionals that can help identify and remove LBP hazards can be contacted at the Lead and Healthy Homes Section at phone number: (866) 691-LEAD.

All housing activities that participated in the Home Loan Rehab Program through the City of Benton Harbor's CEDD underwent lead testing and abatement as necessary.

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

The City works with local non-profit organizations and the Berrien County Housing Resource Network Continuum of Care to address household poverty.

The activities identified in the 2020 AAP worked directly to reduce poverty in Benton Harbor. These activities include; housing rehabilitation activities which will maintain or improve conditions of housing for LMI households and help them avoid homelessness; and economic development activities such as the youth employment program, which is an economic development public service designed to give many unemployed youth some gainful employment over the summer that also involved training as well as experience that will provide lasting benefit to them in the future. Through these activities, the City hopes to improve the quality of life of residents in Benton Harbor.

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

The City is working on increasing the staff capacity in the City's CEDD, which administers the CDBG program. The CEDD has experienced significant staff turnover over the past 5 years. Other City departments have also experienced a high rate of turnover and position vacancies. The high rate of turnover severely stunted the operations and growth of the CDBG program and as well its plans to develop a successful working relationship with other City departments.

The City has continued to work to stabilize its institutional structure by seeking out and hiring qualified, experienced individuals who are passionate about working for the City. In the program year, the City has added two staff members including the Community & Economic Development Director. The CEDD department has established a working relationship with the City's HUD field representative and financial analyst in ongoing efforts to address the problems created by past CDBG program inactivity. The department has ongoing communication with the HUD field representative and has reached out to other grantee municipalities throughout Southwest Michigan and beyond, to establish a network of assistance. These actions will continue into upcoming program years. In addition, the City continues to work with staff from the Southwest Michigan Community Action Agency (SMCAA) to assist in the project

management of its home rehabilitation loan program.

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

The City is committed to focusing efforts to ensure the coordination of stakeholders and continual improvements to the programmatic delivery system. The City is an active participant in the Continuum of Care monthly meetings where it assists in coordinating the services of housing and social agencies and connect residents in need.

Through the Housing Resource Network, the City has worked to promote a communitywide commitment to the goal of ending homelessness; to seek out funding for efforts that seek to address homelessness in Region 8; and to support methods to assist in the re-housing of homeless individuals.

The City has continued to look for ways to enhance coordination in the implementation of the Consolidated Plan through its established partnership with Southwest Michigan Community Action Agency (SMCAA) and relationships with the Benton Harbor Housing Commission, the Berrien County Health Department, the Michigan Department of Health and Human Services (MDHHS) and other local nonprofit stakeholders.

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

The City of Benton harbor has identified three barriers to affordable housing that are related to public policies: Regulations, Finances, and Community Perceptions.

Regulations

Regulatory barriers are present at the local, state, and federal level. These policies include local land use regulations, taxes and fees associated with development, environmental regulations, and the permitting process. Each regulation acts as an additional step that can prevent or inhibit the development of affordable housing, as well as increase the cost of unit production.

Actions Taken: The City of Benton Harbor is in the process of completing its Analysis of Impediments to Fair Housing Choice (AI) which will help to identify the barriers and impediments to fair housing choice and affordable housing in the City. AI will help assist with a better understanding of issues related to policies and regulations that may negatively impact affordable housing in Benton Harbor.

Finances

The available resources to support affordable housing has not kept up with the rising development costs. Projects often have funding gaps resulting in fewer being funded. For potential home buyers, changing

regulations in the mortgage industry and few economic opportunities prevent purchasing the homes that are available.

Actions Taken: While the City doesn't fund homebuyer programs the City does provide direct financial assistance to current LMI homeowners through the Home Loan Rehab Program. The program provides whole home or minor home repair loans to LMI households to help with necessary repairs to maintain conditions that won't lead to issues such as homelessness. The City has also started a Summer Youth Work Program which helps train youth provides work experience for their future.

### Community Perceptions

Affordable housing is often viewed negatively and those perceptions can have a direct influence on public policy. While many people will advocate for affordable housing as a concept, they often push back when the developments will occur in their neighborhoods. This "Not In My Backyard" (NIMBY) perspective can halt affordable housing development before it begins.

Actions Taken: The City CEDD continues to educate and send information about affirmatively furthering fair housing. In future plans, the City will add an Affirmatively Furthering Fair Housing project and activity that will address the negative community perceptions and also inform residents about fair housing laws and their rights.

## **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's CEDD will monitor subrecipients per the guidelines set forth in the subrecipient agreement and in accordance with federal regulations. The City will also continue to use procurement practices that are approved by the federal government. The City's finance department will continue to use acceptable accounting methods for the CDBG program.

The City will continue to work with local businesses and economic development organizations to attract and retain businesses, in particular woman-owned and other minority-owned businesses.

## **Citizen Participation Plan 91.105(d); 91.115(d)**

**Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.**

The City of Benton Harbor CEDD adhere's closely to it's HUD approved Citizen Participation Plan which helps and guides the to City to provide for greater means of outreach to citizens, the public, and local non-profits and agencies.

During the PY 2020 CAPER citizen participation process the City held a 15-day public comment period from September 8, 2021 to September 22, 2021 to allow the public an opportunity to review and make comments on the draft CAPER. The draft CAPER could be downloaded and viewed from the City's Community & Economic Development Department website at <https://bhcity.us/community-economic-development/>. For those who may not use a computer or have accesss to the internet, a hard copy will be available at the Benton Harbor Public Library located at 213 E. Wall St., Benton Harbor, MI 49022.

Public comment regarding the draft PY 2020 CAPER can be submitted in the following ways:

**By Mail:** Community & Economic Development Department

200 East Wall Street

Benton Harbor, MI 49022

**Via E-Mail:** [alittle@bhcity.us](mailto:alittle@bhcity.us)

A public hearing will be held on September 15, 2021 at 7:00 PM at the Personnel and Finance Committee meeting to discuss and receive comments on the draft PY 2020 CAPER.

**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 remains committed to fulfilling its CDBG priority program objectives included in the 2020 Annual Action Plan (AAP) and the 2016-2020 Consolidated Plan. The 2020 AAP was recently approved in the Spring of 2021 and the City’s CEDD is currently implementing the activities identified in the plan. The City does not plan any significant changes to its original program objectives during the 2020 program year.

Due to the City's substantial backlog of funds and subsequently untimeliness, the City will focus on projects that spend large amounts of funds and in a timely manner. For the next few funding years, the City will focus its allocations on physical infrastructure projects that will help low-to-moderate income residents, code enforcement activities and housing rehab activities.

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

No

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

N/A