



PY 2021 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 public services for special needs and low- to moderate-income (LMI) populations. Below are the accomplishments for PY 2021, which is the first year of the 2021-2025 Consolidated Plan. The City of Benton Harbor's lead responsible department for administration of CDBG funds is the Community & Economic Development Department (CEDD).

Public Services for LMI and Special Need: The City continued to provide public service activities such as the Summer Youth Work Program, which was completed in PY 2021. The program employed 58 LMI youth for summer maintenance employment in neighborhoods and in City parks. The City also delivered meals to the homes of 88 LMI elderly persons sheltering from the pandemic as part of the CDBG-CV program.

Public Facilities & Infrastructure Improvements: The City made improvements to the Pipestone/Clay water main system which had a citywide benefit for 9,375 persons in low/mod areas.

Promote Fair Housing: In August 2021, the City completed the Analysis of Impediments to Fair Housing Choice (AI), and continued to present its findings to the community. The City made a presentation of the AI to the Housing Resource Network and the City Commission. The City AI can also be viewed at the CEDD office and webpage. This activity had a Citywide low/mod area benefit of 9,375 persons.

CARES Act Accomplishments

The City provided CDBG-CV funds to CV-Senior Services meals on wheels programs that distributed protein, fresh fruits and vegetables to homebound Benton Harbor seniors 62 years old or older sheltering from COVID-19. A total of 86 LMI elderly persons were assisted with this service in PY 2021.

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
1A Expand & Improve Public Infrastructure	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5000	9,375	187.50%	1000	9,375	937.50%
1B Improve Access to Public Facilities	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5000	0	0.00%	1000	0	0.00%
2A Housing Rehabilitation	Affordable Housing	CDBG	Homeowner Housing Rehabilitated	Household Housing Unit	75	0	0.00%	15	0	0.00%
2B Code Enforcement	Affordable Housing	CDBG	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	4000	0	0.00%			
3A Clearance and Demolition	Non-Housing Community Development	CDBG	Buildings Demolished	Buildings	22	0	0.00%	10	0	0.00%

4A Provide Public Services for LMI & Special Needs	Non-Housing Community Development	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1500	144	9.60%	250	144	57.60%
4B Affirmatively Further Fair Housing	Affordable Housing	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	100	9,375	9375.00%	100	9,375	9375.00%

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.

PY 2021 is the first year of the 2021-2025 Consolidated Plan period, and the City has identified as its priority needs for the community: Expand/Improve Public Infrastructure & Facilities, Affordable Housing Development & Preservation, the Removal of Slum & Blight and Public Services & Quality of Life Improvements. CDBG funded activities must address one of these needs as well as primarily benefit LMI persons or special needs populations.

Public services funded such as the 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. Affordable housing preservation was funded through the Southwest Michigan Community Action Agency (SMCAA) Home Rehabilitation Loan Program Administration and the City Owner-Occupied Housing Rehab Program to assist homeowner households with housing rehab. Housing rehab addresses one of the highest needs in the City. Public infrastructure improvements were funded to the Pipestone/Clay Watermain Replacement improvement program.

Goals Accomplished against Goal Outcome Estimates in PY 2021

1A Expand & Improve Public Infrastructure: The City had a goal to serve an estimated 1000 persons with public improvements and exceeded this

goal with 9,375 persons assisted in low/mod areas.

1B Improve Access to Public Facilities: The City had a goal to serve an estimated 1000 persons with public facilities improvements, however this goal was not achieved. The City focused on the water/sewer project in PY 2021.

2A Housing Rehabilitation: The City had a goal to assist 15 LMI households with this activity. At this time, the City started rehab on a number of LMI households units under its regular CDBG and the CV funding for this activity as the program that were not complete at the end of the program year.

3A Clearance and Demolition: The City had a goal for 10 buildings demolished, however this project has not yet started. The City still plans to report these activities during the Consolidated Plan period.

4A Provide Public Services for LMI & Special Needs: The City had a goal to assist 250 persons with public services and was able to assist 144 LMI persons through the Summer Youth Work Program and Elderly meals-on-wheels program. The City will continue to prioritize the youth employment program and other public services that assist LMI residents with the highest need.

4B Affirmatively Further Fair Housing: They City continues to benefit from the completion of the AI. The City made a presentation of the AI to the Housing Resource Network, the City Commission, and made the AI available at the CEDD office and CEDD webpage. This activity had a Citywide low/mod area benefit of 9,375 persons.

CARES Act Accomplishments

The City provided CDBG-CV funds to CV-Senior Services meals on wheels programs that distributed protein, fresh fruits and vegetables to homebound Benton Harbor seniors 62 years old or older sheltering from COVID-19. The City had a goal to assist 20 LMI elderly, and exceeded this goal with a total of 86 LMI elderly persons assisted in PY 2021. The City will continue to work on its established goals from the PY 2019 AAP CARES Act Amendment which include rental and/or utility assistance to LMI households negatively affected by COVID-19, homeless shelter operations in support of programs that keep individuals and families healthy and safe from the pandemic, and provided food bank and personal hygiene product services to 184 families.

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	21
Black or African American	122
Asian	0
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
Total	143
Hispanic	1
Not Hispanic	143

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. There was one “other race” assisted, so the total assisted by race only shows 143 persons, however the City actually assisted a total of 144 persons.

According to the most recent 2016-2020 American Community Survey 5-Year Estimates, 85.1% of the population was Black, followed by 12.8% for Whites and 1.5% for “Two or more races”. Persons who identified ethnically as Hispanic were 3.9% 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.

For activities that the City was able to record race/ethnic information, 84.7% of CDBG funding went towards assisting black or African Americans and 14.7% went towards assisting white persons. All other minority race/ethnic groups received less than 1% or none at all.

Housing Needs Assessment

The Needs Assessment in the City’s 2021-2025 Consolidated Plan, assesses if any racial and ethnic group by income category has a disproportionate need in the area with regards to 1.) Housing problems, 2.) Severe housing problems and 3. Housing 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).

Housing Problems (from NA-15): According to the Needs Assessment, for regular housing problems, Hispanic households experience a disparity at 0-30% AMI. White households and Hispanic households reported a disproportionate housing problem at 30-50% of AMI. There are no other racial or ethnic groups that consistently experience housing problems at a disproportionately high rate across income groups.

Severe Housing Problems (from NA-20): For severe housing problems, Hispanic households also experience a disparity at 0-30% and 30-50% of AMI. There are no other racial or ethnic groups that consistently experience housing problems at a disproportionately high rate across income groups.

Housing Cost Burden (from NA-25): For housing cost burden there are no racial groups that are disproportionately cost burdened, and there is not a clear correlation between a household being cost burdened and their race or ethnicity. Cost burden in general is the largest housing problem in the City. HUD defines cost-burden as paying more than 30% monthly income on housing costs. According to the 2020-2024 ACS, 68.2% of renters and 25.4% of homeowners are cost-burdened.

In comparing the disproportionate needs of certain race/ethnic groups as described by the Needs Assessment to the beneficiary outcomes provided, the City has worked sufficiently to serve black or African American households with housing and community development services.

All other minority groups are small in Benton Harbor; however, it must be noted that Hispanic households have disproportionate housing problems at lower income levels, and it is the City's intention to assist this group regardless of size. The City will continue to target Hispanic households when administering its CPD programs. To address this, steps such as advertisements and working with local organizations in the community will be made. This may also require translation and advertisement to target communities to ensure Hispanic households are assisted with CPD programs.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	974,848	399,332

Table 3 - Resources Made Available

Narrative

In PY 2021 the City had resources made available with \$416,503 from the annual CDBG allocation and \$558,345 from reallocated prior year funds for a total of \$974,848 in CDBG EN funds. According to the PR-07, the City expended \$399,332 in PY 2021. Expenditures included funds for housing rehab activities, public services with the Summer Youth Employment Program, public infrastructure improvements at the Pipestone/Clay Street watermain project and program administration of the CDBG program. The following are expenditures by program categories:

Affordable Housing: \$26,444.44

Public Services: \$15,772.16

Public Improvements: \$260,324.04

Administration: \$96,791.75

Prior Year Resubmission Note: The City adjusted vouchers created for a total of \$143,639.83 which were added to the amount expended during the 2020 program year. These vouchers were removed from the PY 2021 expenditures. The three vouchers adjusted were:

Admin #198 - \$10,204.81

Youth Services Job Program - Pub Wks #196 - \$97,237.50

Youth Services Job Program - Pub Wks #196 - \$36,197.52

CARES Act Funds

CARES Act CDBG-CV funds were awarded in two rounds (CV1 & CV3) to the City for a total of \$328,823 to assist Benton Harbor in its efforts to prevent, prepare for and respond to the coronavirus (COVID-19) pandemic. Funds were made available through an amendment to the 2019 AAP, and was just recently approved towards the end of PY 2020. As of the PY 2021, the City expended \$18,382 on activities: CDBG-CV Senior Services, CDBG-CV Housing Rehab, CDBG-CV Foodbank program, and CDBG-CV Admin.

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 of Benton Harbor does not allocate funding based solely on geographic requirements. When the project or planned activities are intended to serve individuals or households directly, beneficiaries must meet income and residency requirements in order to receive assistance. CDBG program funds will be utilized to develop programs and activities that will provide assistance to low- and moderate-income residents and benefit the City as a whole in improving the quality of life for the residents.

The City has also identified public facility and infrastructure improvement activities as a need in Benton Harbor. These planned activities have an “area-wide” benefit. Per HUD requirements, these areas must be within an eligible Census Block Group Tract, as defined by HUD-CDBG regulations, whereby the majority of the residents are low- to moderate-income (51%). There are only three-tracts (CT 06 BG-3, CT 26 BG-1, and CT-08 BG-2) that are not Low/Mod in Benton Harbor.

To determine these tracts the City utilizes HUD’s CDBG Low Mod Income Summary Data (LMISD) from the HUD Exchange website, which has defined the eligible block group tracts within the jurisdiction. The tracts can be at: <https://www.hudexchange.info/programs/acs-low-mod-summary-data/>

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.

The City also leveraged funding from the Southwest Michigan Community Action Agency in the amount of \$75,000 of CDBG funds to expand its summer youth employment program and from Michigan Works, where they committed DOL funding to support 119 positions for older youth ages 16 to 19.

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

The City has a priority to improve infrastructure in LMI areas of the City. The City has identified sidewalk replacement and improvements do LMI individuals and families can have accessible, clean and safe pathways.

This priority was identified through the citizen participation process and community survey during the development of the plan. The City has targeted city-owned streets and sidewalks in low/mod block group tracts in the City that have been identified as low/mod. 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 water main system at Pipestone and Clay Street (0004001, 0004002, 0005001).

The City will also continue to make improvements to public facilities and utilize public parks to run public services programs over the next 5-years of the Consolidated Plan as needs are identified. The City currently employs youth for the Summer Employment Program at the City parks located in LMI areas which can be found listed in the City's Parks and Recreation webpage: <https://bhcitv.us/parks-recreation/>

CR-20 - Affordable Housing 91.520(b)

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

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

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	15	0
Number of households supported through Acquisition of Existing Units	0	0
Total	15	0

Table 6 – Number of Households Supported

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

Unfortunately, there were no affordable housing activities completed in PY 2021 for CDBG housing rehab programs. The City's CEDD staff is still currently working with the Southwest Michigan Community Action Agency for project admin management of the home rehabilitation loan program. The City also is planning to start the Housing Rehab Loan Program. The City will provide Emergency Loans up to \$5,000 and Whole House Rehabilitation Loans up to \$25,000 to eligible homeowners to make eligible repairs to their homes. These activities have just started and the City anticipates to report these accomplishments in future CAPERs.

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.

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

Number of Households Served	CDBG Actual
Extremely Low-income	0
Low-income	0
Moderate-income	0
Total	0

Table 7 – Number of Households Served

Narrative Information

As mentioned above, there were no affordable housing activities completed in PY 2021. Housing rehab activities have just started and the City anticipates to report these accomplishments in future CAPERs. 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.

Worse case needs are also low-income renter households who are severely housing cost burdened (households that pay more than 50% of income towards housing costs). According to the CHAS data in the NA-10 of the 2016-2020 Consolidated Plan, there were approximately 850 LMI renter household that fit this description in Benton Harbor. While affordable rental housing for extremely low-income households is a need in the City, there are currently no programs that address this issue directly. With the City’s limited CDBG funds, the current affordable housing priorities are to assist homeowners with

housing preservation and rehab, reducing hazards in homes, and affirmatively furthering fair housing. Other affordable housing initiatives such as affordable rental housing may be assisted through economic development opportunities for residents and public services provided by local service providers that may help offset these issues.

Other Actions Taken to Foster and Maintain Affordable Housing

The City completed the Analysis of Impediments to Fair Housing Choice in July of 2021. The City made a presentation of the AI to the Housing Resource Network and the City Commission. The City AI can also be viewed at the CEDD office and webpage.

A project that is currently in development is a 55-unit Permanent Supportive Housing project that is being undertaken by MHT Housing in downtown Benton Harbor. Residents would be given a project based Section 8 voucher through the Michigan State Housing Development Authority, as well as a variety of supportive services for those at the property.

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 serve this population. The Housing Resource Network (HRN) consists of representatives from local non-profits, which actively works to prevent and end homelessness and poverty. They developed and maintain a system to coordinate the community's resources and services for people experiencing homelessness and those that are precariously housed. The HRN is a primary resource for homeless needs in the City and County.

The City also maintains relationships with several emergency shelters for the homeless in Benton Harbor. These shelters include Emergency Shelter Services, the Salvation Army, and Child & the Family Services of Southwestern Michigan Safe Shelter for Domestic Violence.

Addressing the emergency shelter and transitional housing needs of homeless persons

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

1. Emergency Shelter Services (ESS): 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 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 statewide Michigan Interagency Council on Homelessness Continuum of Care (CoC) offers a Permanent Supportive Housing (PSH) program, which provides housing and supportive services as a cost-effective way to help people live more stable, productive lives. Supportive services include job training, life skills training, alcohol and drug abuse, and case management. PSH helps people to recover and succeed while reducing the overall cost of care. Services are flexible and primarily focused on the outcome of housing stability.

The CoC helps coordinate effectively with mainstream service providers for individuals and families at risk of becoming homeless or returning to homelessness after being discharged from care. The CoC's Campaign to End Homelessness coordinates spreading information about programs, referrals to resources and care, and housing and employment services. See the Michigan's Campaign to End Homelessness website at: <https://www.michigan.gov/mcteh>.

At this time, the City does not work directly with homeless individuals and instead refers people to services and providers within the City that are connected to the CoC.

Additionally, the Benton Harbor Housing Commission (BHHC) provides assistance to public housing residents to help them avoid homelessness. The City continues to support the BHHC on projects such as the economic self-sufficiency program, which helps public housing residents avoid becoming homeless, and eventually move them closer to homeownership.

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

Though the City of Benton Harbor does not directly assist homeless persons, they continue to maintain a relationship with the HRN and its member agencies to work to assist homeless individuals in making the transition to permanent housing and independent living.

The HRN continues to coordinate care among its member agencies. Through their network, the HRN is able to provide all types of individuals or families a variety of assistance such as Permanent Supportive Housing, shelter, case management, health referrals, job training and education.

Michigan's CoC assists in coordinating Permanent Supportive Housing (PSH) for individuals and families. PSH offers housing and supportive services, as a cost-effective way to help people transition to more permanent housing and independent living. PSH often includes supportive services such as job training,

life skills training, alcohol and drug abuse recovery programs, and case management services.

Throughout the state there are over 2,500 housing units designated as supportive housing. 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 the county.

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 are served by the Benton Harbor Housing Commission (BHHC). The City's CEDD continues to meet with the BHHC to address and improve the lives and living conditions 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 completed ongoing repair and maintenance of existing public housing units as well as provision/maintenance of necessary neighborhood infrastructure to allow for future new construction.

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 BHHC to support their work in resident engagement and education. The BHHC 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)

Benton Harbor is committed to the elimination of barriers to affordable housing and commits to affirmatively furthering fair housing in the City. As the City's Community & Economic Development Department (CEDD) continues to add to their staff capacity, the City is becoming better equipped to focus on meeting the requirement of affirmatively furthering fair housing. The City continues to reserve funds in its yearly allocation to address findings from the AI, as well as to better prepare itself to comply with the new Affirmatively Furthering Fair Housing (AFFH) rule. The City continues to partner with the Fair Housing Center of Southwest Michigan, the predominate provider of fair housing information and resources in the area.

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

During PY 2021, the City continued to focus on strengthening relationships with area public service providers. This included 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 continues to work with are the Berrien County Housing Resource Network Continuum of Care, Berrien County Health Department, Berrien County Human Service Coordinating Council, the Benton Harbor Housing Commission, and more.

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

The Community & Economic Development Department continues to address lead based paint (LBP) hazards through all related housing activities, especially the housing rehabilitation program. The City tests and addresses 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.

The City is also working with the Michigan Department of Health and Human Services to address problems of lead paint in houses. The City leveraged a \$100,000 contract with MDHHS to address lead abatement in homes of some medicare/Medicaid eligible residents. MDHHS is performing all lead assessment for the City on homes designated for the CDBG rehabilitation program and provide the findings to the City, saving significant sums for the City's program.

Households that have been identified to be exposed to LBP hazards are 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.

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

The activities identified in the 2021 Annual Action Plan worked directly to reduce poverty in Benton Harbor. These activities included; housing rehabilitation activities which maintain or improve conditions of housing for LMI households and help them avoid homelessness; the removal of slum and blight to improve safety and the living situation in LMI areas; and providing supportive services for LMI households and the special needs populations to improve their quality of life in Benton Harbor.

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

The City of Benton Harbor's Community & Economic Development Department (CEDD), which administers the City's CDBG program, 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 continues its efforts to stabilize its institutional structure by seeking out and hiring qualified, experienced individuals who are passionate about working for the City. 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 have continued through PY 2021 and will continue in the coming years.

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 continues 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. The City continues to work with the Continuum of Care for Region 8 through the Housing Resource Network, 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.

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 completed its Analysis of Impediments to Fair Housing Choice (AI) in July of 2021, which helped to identify the barriers and impediments to fair housing choice and affordable housing in the City. AI continues to help assist with a better understanding of issues related to policies and regulations that 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: Though 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, avoid further decay of housing stock, and prevent homelessness.

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 PY 2021 City funded an Affirmatively Furthering Fair Housing activity in order to address the negative community perceptions and also inform residents about fair housing laws and their rights. The City CEDD made a presentation of the AI to the Housing Resource Network and the City Commission. The City AI can also be viewed at the CEDD office and webpage.

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 monitors subrecipients per the guidelines set forth in the subrecipient agreement and in accordance with federal regulations. The City also continues to use procurement practices that are approved by the federal government. The City's finance department continues 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.

The comprehensive planning requirements include the development and consolidated plan process of the 5-Year ConPlan, the AAP, and CAPER. Citizen participation is a vital part of the Consolidated Plan process and the City will make sure to follow its HUD approved Citizen Participation Plan (CPP) which helps guide the City to gather information which is an essential component in identifying the priority housing and community development needs in Benton Harbor. These priority needs form the basis of the City's Strategic Plan in the ConPlan and annual goals and activities carried out in each subsequent AAP.

The ConPlan is developed every 5 years, with identified priority needs and goals to address these needs. Each year of the 5-Year plan, the City develops an AAP which identifies the projects and activities that will address and further the goals of the plan. This plan is required to be submitted to and approved by HUD each year to receive CDBG funding annually. At the end of each AAP program year, the City will report on the accomplishments and performance of the program through the CAPER. Citizen participation is required in the development of each of these stages as per 24 CFR 91.105. In PY 2021, the City completed the first year of its 2021-2025 ConPlan.

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 adheres closely to its HUD approved Citizen Participation Plan which helps and guides the City to provide for greater means of outreach to citizens, the public, and local non-profits and agencies.

During the PY 2021 CAPER citizen participation process the City held a 15-day public comment period from **August 23, 2022 to September 12, 2022** 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 access 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 2021 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@bhcit.us

A public hearing will be held **on September 6, 2022 at 7:00 PM** to discuss and receive comments on the draft PY 2021 CAPER.

In accordance to the ADA of 1990, all persons with a disability who need accommodations to participate could contact the Director of CEDD by phone or email. All non-English speaking persons who need translation services could also contact the Director of CEDD by phone or email. The City will upon request with seven (7) calendar days' notice, provide interpreter services at the public meeting. The public hearing held at the Lula Lee Commission Chambers at City Hall is ADA accessible. Persons with a disability may also view documents on the website.

Summary of Public Comments:

Public Comment Period: TBA

Public Hearing: TBA

Detailed comments and meeting minutes, as well as a summary of public comments will be attached to the CAPER report and to the citizen participation attachment in the CR-00.

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.

PY 2021 is the first year of the 2021-2025 Consolidated Plan and there were no changes to the priorities and goals identified in this plan. The City did however substantially amend the Consolidated Plan to reallocate prior year funds, however this did not change the overall needs and goals of the plan. The Substantial Amendment to the Consolidated Plan included unspent prior year funds towards the neighborhood sidewalk replacement program and the neighborhood demolition program to eliminate slum and blight. The City does not plan any changes to its original program objectives during the next four years of the Consolidated Plan period.

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. These expenditures have already started in PY 2021 with expenditures towards the Pipestone/Clay Water Main (#188) and Sidewalk Improvement (#210) improvement projects

CARES Act

The COVID-19 pandemic continues to present health and safety concerns in PY 2021, and the City is working to meet the goals established to address these concerns. The City has begun distribution of meals for LMI elderly households and housing rehab activities for LMI households sheltering from the pandemic. These activities are expected to ramp up as the pandemic becomes more manageable. At this time, the City does not plan any changes to its original program objectives for CDBG-CV.

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

N/A

CR-58 – Section 3

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

Total Labor Hours	CDBG
Total Number of Activities	0
Total Labor Hours	0
Total Section 3 Worker Hours	0
Total Targeted Section 3 Worker Hours	0

Table 8 – Total Labor Hours

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

Provided or connected residents with training on computer use or online technologies.	
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	
Other.	

Table 9 – Qualitative Efforts - Number of Activities by Program

Narrative

On October 29, 2020 HUD made effective a Final Rule, which set new benchmarks for Section 3 under 24 CFR 75. Section 3 helps to establish more economically sustainable communities by ensuring that employment and other economic opportunities generated by Federal assistance for development programs are directed towards very low- and low-income persons to the greatest extent possible, and in particular to those who are recipients of the Federal assistance. The Final Rule changes tracking the number of qualified new hires in Section 3 projects, to tracking the total labor hours worked.

As applicable to the City, the benchmark for Section 3 workers was set at 25 percent or more of the total number of labor hours worked by all workers on a Section 3 project. The benchmark for Targeted Section 3 workers was set at 5 percent or more of the total number of labor hours worked by all workers on a Section 3 project.

Section 3 Projects cover housing rehab/construction and public improvement construction activities assisted under HUD grant programs that provide housing and community development financial assistance that exceeds a threshold of \$200,000. A \$100,000 project threshold applies to grants under HUD's Lead Hazard Control and Healthy Homes programs. For PY 2021, there were no activities that were subject to the Section 3 threshold.