

City of Battle Creek HOME-ARP Allocation Plan

The information provided reflects the requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program*. References to “the ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

Consultation

Description of the consultation process including methods used and dates of consultation:

The consultation process consisted of soliciting input from the Calhoun County Housing Solutions Board (HSB), which is the executive board of the Calhoun County Continuum of Care, and the Calhoun County Homeless Coalition (HC) membership, which represents an expansive and more comprehensive group of housing service providers. The consultation period started with a presentation to the HSB in December of 2021 and concluded with follow up interviews during city monitoring of sub-recipients. Members of the HSB and HC were solicited during presentations on HOME-ARP at their regular meetings as well as through a letter that was distributed to the email list for both groups. Members were provided a number of ways to contribute to the creation of the HOME-ARP allocation plan, including:

- scheduling a 30 minute consultation interview with City staff;
- Attending a public hearing on community needs (January 18, 2022)
- HSB members could volunteer to participate on the team that created the weights and criteria for the strategic value score card that was used to score proposals;
- Complete a survey with questions that mirrored the consultation interviews.

In addition, city staff conducted monitoring of CDBG-CV grantees, all of whom are members of the Homeless Coalition in the month of May, and used the monitoring interviews as an opportunity to ask questions about community needs related HOME-ARP planning process.

List of organizations consulted and summary of the feedback received:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Calhoun County Human Relations Board	CoC Executive Board, homeless service providers, domestic violence service providers, veterans groups, public housing agency, represented orgs provide services that cover all qualifying populations	Attended 3 meetings that included two presentations, Q & A, needs discussion. Solicited participation in needs public hearing & survey	12.17.21—Discussed the need for non-congregate shelter, particularly for families and homeless with covid; need for more hotel vouchers as a homelessness triage tool; need for homeless facility improvements including permanent showers and permanent separate shelter area for women at low-barrier shelter and various improvements at the mental health drop in center to support homeless, near-homeless, and housing insecure families; and need for more case management and housing navigator services. 1.28.22—Discussed the need for more affordable housing units, particularly for higher risk tenants such as those with criminal or poor credit histories, people with disabilities, those with a past eviction; suggested non-congregate shelter and homelessness triage for homeless families not be considered a priority as this may be a short-term trend—rather prioritize the creation of new units or other supportive services to get people permanently housed.
Calhoun County Homeless Coalition	CoC membership group, homeless service providers, domestic violence service providers, veterans groups, public housing agency, public organizations that address civil rights	Attended multiple meetings, provided a presentation on HOME-ARP, solicited participation in needs public	2.15.22—discussed the use of a strategic value score card based on the Homeless Coalition’s Plan to End Homelessness; need for non-congregate shelter, in particular the need for a tiny home village similar to the Eugene, Oregon model; need for affordable, attainable housing, in particular permanent supportive housing;

	and the needs of persons with disabilities, represented orgs provide services that cover all qualifying populations	hearing and survey	concerns that the size of the city's HOME-ARP allocation was not large enough to have a meaningful impact via developing new housing units; concerns that developing permanent supportive housing was too complex an activity and that project scoring should weight project complexity heavily; need for supportive services. particularly housing navigation services.
Calhoun County Continuum of Care (CoC)	CoC represented orgs provide services that cover all qualifying populations	Written correspondence from CoC Executive Director, 1.18.22	CoC data during Covid is not most reliable, with lifting of eviction moratorium and spending down of rental assistance funds seeing trend towards higher homeless numbers from previous years; long wait lists for landlord who work with tenants with complicated histories. Pre-covid 1200 literally homeless, during covid 732 literally homeless; 22% are seniors over age 55; 16% are veterans. Currently homeless families and homeless youth numbers are rising and shelters are operating at full capacity. One third of homeless are families—60% of these are led by single parent. 20% of literally homeless are children under the age of 17. 309 DV survivors sheltered and 256 unsheltered children in DV shelter prior to pandemic—up to 427 DV survivors sheltered in 2021. CERA rental assistance provided to 1800 households in Calhoun County through January, 2022.
Haven At Rest	Homeless Shelter. Serves homeless (including chronically homeless), at-risk of homelessness,	Interviewed Executive Director, comments at public hearing	Increased need for homeless shelter services; Eviction moratorium and addition of new low barrier shelter reduced individuals served—1100 in 2020 to 826 in 2021—but the folks that

	DV/Attempting to flee sex trafficking, Other populations as defined by the HOME-ARP notice, and veterans		<p>stay at the Haven stay longer, 21% increase meals served in 2021; 28,000 bed nights in 2020 compared to 34,000 in 2021. The Haven is having a hard time keeping people housed. 1/3 of their clients are fairly easily housed. 1/3 do pretty well in shelter housing, are familiar with shelter and support systems. 1/3 have chronic problems and are extremely difficult to house.</p> <p>While there is a need to triage homeless families and individuals with Covid, this is likely a short term trend or one that doesn't trump the need for other supportive services or long-term housing. Instead of providing non-congregate shelter to m</p>
Share Center	Drop in Center. Serves homeless (including chronically homeless), at-risk of homelessness, DV/Attempting to flee sex trafficking, Other populations as defined by the HOME-ARP notice, people with a disability, and veterans	<p>Executive Director—interview (1.18.22) and survey</p> <p>Volunteer—survey</p> <p>Homeless Client—survey</p>	<p><u>Executive Director</u></p> <p>Share Center has been a drop in center and helps families in recovery process, tend to see people that are chronically homeless. Seeing more and more families.</p> <p>Need more affordable housing, particularly housing that meets the needs of people with complicated rental histories or a disability that may result in them being perceived as high risk.</p> <p>Need more supports to address the barriers of addiction and mental health issues. Studies from Center of Disease Control and Kaiser Family Foundation show rates of issues with substance abuse and/or mental health were already increasing before the pandemic and have skyrocketed as a result of the stress and social isolation</p>

			<p>associated with the pandemic. Economic Roundtable estimates the chronically homeless population with increase by 49% in next four years. Locally, these findings are validated by the Calhoun County Community Health Needs Assessment that ranked mental health and substance abuse issues as two of the highest priority needs in Calhoun County.</p> <p><u>Volunteer</u> Need better coordination of services between drop in center, shelters, and other service providers. There are a lack of sheltering options for families. Lack of funding for full time services coordinator and peer counselors for Share Center.</p> <p>Need more warm safe comfortable beds, warm meals and snacks. Need to address mental health and addiction. We have some of this stuff, but not enough.</p> <p>There is a lack of trust by unhoused people for the “official” representatives of service organizations. We need these reps to be “of the people”. The reps should be folks who have been homeless or addicted or with mental health issues, and have successfully negotiated the system and have lifted themselves up.</p> <p>We need permanent supportive housing, affordable housing, and education opportunities for home ownership.</p> <p><u>Homeless Client</u></p>
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			Need an opportunity to get a home for less money so we can get the other things we need. Need safe housing—not a lot of safe housing options we can get into.
Neighborhoods Inc. of Battle Creek (NIBC)	Housing agency, HARA, provides rental assistance and TBRA to all qualifying populations	Interview with Executive Director and Survey with staff	<p><u>Executive Director</u> NIBC has been working on expanding the scope of housing—2200 people have been provided some type of housing assistance during the pandemic (mostly CERA funded rent assistance and housing navigator services). NIBC has a role to play keeping people housed as the crisis evolves. A big concern is mental health for people struggling with housing during the pandemic. 70% of folks struggling with homelessness have issues with mental health. NIBC is exploring ways to make more referrals for mental health services and ensure they get more comprehensive help.</p> <p><u>Staff</u> Need to improve people’s ability to secure rental housing. People are getting processed and have vouchers, but have nowhere to use them.</p> <p>There is a desperate need for housing units.</p> <p>The City of Battle Creek needs to address the empty buildings we have and how they can be quickly turned around into housing. We need to reach out more to developers to see what can be done to transform these spaces and start making a dent in this housing crisis.</p>
Safe Place	Domestic Violence Shelter, provides	Executive Director,	Need a separate shelter space for victims of sex trafficking. Need

	shelter to DV survivors and services to DV survivors and individuals attempting to flee sex trafficking	interview and survey	both temporary shelter space and permanent housing placement. Domestic violence rates have been way up during the pandemic. Having a really hard time placing people in housing from the shelter—mostly due to inability to locate housing that will accept vouchers. Too many complexes will not accept vouchers.
Battle Creek Housing Commission	Public Housing Agency	Interview	<p>Housing vouchers are going unused. Housing Commission plans to study this problem to better understand why, but suspects that folks are having a hard time finding landlords that will take them. Some homeless are sneaking into BCHC facilities to sleep in stairwells or laundry rooms--a sign that some homeless aren't being reached.</p> <p>Need housing that will accept vouchers and subsidies. Consider using HOME-ARP or CDBG funding to do outreach and help public housing clients use choice vouchers. Provide support services for housing seekers such as: security deposit assistance, cover application fees, provide transportation to appointments, make referrals to other types of assistance, etc. Need permanent supportive housing for chronically homeless--something project based with supportive services.</p> <p>Need more information about why landlords are not accepting vouchers and what would get them to consider changing their practice. Need more information about why people are not using the vouchers they are awarded.</p>

			BCHC is willing to project base some of their choice vouchers for PSH. They recently discovered that they can project base up to 30% of their vouchers if PSH.
Voces	Public Agency, serving all QPs, provides a number of supportive services and housing case management to the Hispanic/Latinx population	Survey	<p>Members of the LatinX community that come into Voces are not aware of available resources. Awareness of available resources to LatinX community is an issue. Often times LatinX community members meet the definition of being homeless without being aware.</p> <p>Language is one of the biggest barriers for the LatinX community. Additionally, applications that require social security numbers are a barrier.</p> <p>Continue to work towards becoming a welcoming city to all. New housing connector position is demonstrating a need for housing services. Focus is on helping Hispanic/Latinx folks understand what housing resources are available, how to access them, where to access them. etc. Awareness is growing, but continued funding for the position is needed.</p>
Legal Services	Public Agency serving all QPs, provides legal aid to low income households, eviction diversion	Interview	Need more service/housing navigation. Landlords are increasing rents, rates dramatically increasing. Legal Services staff are concerned about CERA assistance ending as it has been instrumental in keeping people housed.
Fair Housing Center	Fair Housing, civil rights, disabilities	Interview	Landlords not accepting vouchers has been a problem. In Kalamazoo, which is also part of the FHC service area, there is an ordinance that prohibits

			<p>discrimination based on source of payment, but they have struggled to enforce the ordinance.</p> <p>They have seen an increase in cases where landlords refused or mishandled reasonable accommodation requests.</p>
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Feedback received was incorporated into the HOME-ARP planning process through the creation of a scorecard to assist with evaluating and selecting project proposals for funding. The scorecard was created by a group made up of three City Community Development staff and five members of the Housing Solutions Board, the executive board of the Calhoun County Homeless Coalition. The scorecard creation process included the qualitative and quantitative information gathered through the consultation, public participation, and community needs assessment processes. A guide to the scorecard, titled “HOME-ARP Strategic Priority Guide”, was created for use by agencies submitting proposals and is attached to this allocation plan.

The HOME-ARP Strategic Priority Guide articulates the preferences for the HOME-ARP funding along with weights and outcome criteria for evaluating proposals. The scorecard and guide do not include any limitations, but do include preferences for proposals that serve or impact qualifying populations. The scorecard incorporates multiple preferences in each qualifying population category including but not limited to chronically homeless, homeless, homeless families, unaccompanied homeless youth, veterans, domestic violence survivors, and families and individuals at risk of homelessness. The full list of preferences are included in detail in the priority guide.

Public Participation

In accordance with Section V.B of the Notice (page 13), the City of Battle Creek provided for and encouraged citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, the City provided residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of 15 calendar days. The City followed its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, the City held a public hearing during the development of the HOME-ARP allocation plan and prior to submission.

Per requirements, the City made the following information available to the public:

- The amount of HOME-ARP the City will receive, and
- The range of activities the City may undertake.

As required, the City followed applicable fair housing and civil rights requirements and procedures, throughout the HOME-ARP allocation plan public participation process, for

effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents.

Dates of the public comment period and public hearing(s) held during the development of the plan:

- ***Date(s) of public notice: 6/30/2022***
- ***Public comment period: start date - 7/13/2022 end date - 7/29/2022***
- ***Date(s) of public hearing: 7/19/2022***

Description of the public participation process:

City staff made the draft plan available for review and public comment from July 13, 2022 through July 29, 2022 and held a public hearing on the draft plan on July 19, 2022. The public hearing was held in person at City Hall.

City of Battle Creek staff consulted with a variety of key stakeholders in the preparation of the HOME-ARP Allocation Plan to discuss current challenges related to homelessness and homeless prevention. Individuals representing government and policymakers, nonprofit organizations, health care providers, affordable housing developers, housing advocates, homeless coalition members, the homeless population and other interested parties were invited to participate to ensure a diverse array of stakeholders feedback.

During the consultation and data gathering phase of creating the City's allocation plan, the City held its public hearing on community development needs for its annual action plan on January 18, 2022. Staff solicited community organizations, members of the homeless coalition, and homeless representatives to participate in the public hearing to specifically address homeless needs. The public hearing was well-attended with many participants talking about community needs related to homelessness and homeless prevention. Data from this public hearing was considered in the preparation of this plan.

Description of efforts to broaden public participation:

Efforts to broaden public participation included public presentations, special interest group presentations, consultations, surveys and solicitations distributed through various list services or emailing lists, public notice ads, and public hearings. These efforts resulted in a broad array of stakeholders participating in the process. In many cases, organizations that participated provided feedback from the executive, staff, volunteer, and client perspectives.

Summary of the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:

Because the public participation process took place over months and because many stakeholders were engaged multiple times and in multiple ways, the themes evolved over time. Early in the process there was support for non-congregate shelter and rent assistance, but as the process

continued feedback and the data pointed more towards developing affordable housing, particularly permanent supportive housing, and investing more in supportive services to help individuals and families address barriers to getting into or sustaining themselves in affordable housing.

Concerns about CERA rent assistance funds ending were raised, but the City currently has over \$200,000 of unspent TBRA available through a sub-recipient, with the ability to program more formula HOME funds for this purpose should the need become apparent. Also, the BC Housing Commission has unused vouchers and is concerned that clients are having a hard time finding housing that will take them.

One community member spoke at the July 19, 2022 public hearing regarding the need for more supports for homeless families and families at risk of homelessness. They noted that funding non-congregate shelter to triage homeless families was not prioritized, and while they agreed that it might not be the most cost effective way to triage homeless families' needs, they did want to affirm that other triage strategies being implemented currently needed to be better supported. Staff agree and point to the supportive services funds being made available as a way that that need was being met in the allocation plan.

Summary of any comments or recommendations not accepted and reasons why:

The need for non-congregate shelter for victims of sex trafficking was raised and a specific project idea was proposed that had the backing of SAFE Place, the County's primary domestic violence shelter. The comments related to this issue were considered compelling, but through consultation with SAFE Place and other stakeholders, it was determined that the proposed projects would not be viable. The project required resources beyond the scope of the HOME-ARP funds, and with only partial funding from HOME-ARP a plan couldn't be put in place within the implementation schedule the City laid out for its HOME-ARP program.

Needs Assessment and Gaps Analysis

The Needs Assessment and Gaps Analysis examines the size and composition of qualifying populations, identifies current resources available, assesses unmet housing and services needs of these populations, and calls attention to existing gaps.

Template:

OPTIONAL Homeless Needs Inventory and Gap Analysis Table

Homeless												
	Current Inventory					Homeless Population				Gap Analysis		
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds

Emergency Shelter	77	20	65	0	0								
Transitional Housing	0	0	31	0	0								
Permanent Supportive Housing	0	0	12	12	87								
Other Permanent Housing	0	0	0	0	0								
Sheltered Homeless						11	105	22	4				
Unsheltered Homeless						0	5	1	0				
Current Gap										-66	9	2	0

Suggested Data Sources: 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

Housing Needs Inventory and Gap Analysis Tables

AFFORDABILITY GAP ANALYSIS, PSA					
Monthly Rent	Under \$562	\$562-\$963	\$963-\$1,284	\$1,284-\$1,926	\$1,926+
% Area Median Income	30% AMI	30% to 60% AMI	60% to 80% AMI	80% to 120% AMI	120% AMI+
# of Renter Households	3,890	3,197	2,336	2,498	144
Number of Rental Units	885	6,642	1,518	541	1,915
Gap: Over (-)/Under Supply(+)	3,005	-3,445	818	1,957	-1,771
Source: U.S. Census B25063; Claritas; Ribbon Demographics; Analysis by Prior & Associates					

Source: Chart is from p.79 of the 2019 Battle Creek Housing Needs Assessment.

Income by Housing Problems (Owners and Renters)	Household has at least 1 of 4 Housing Problems	Household has none of 4 Housing Problems OR cost burden not available no other problems	Total
Household Income <= 30% HAMFI	2,440	415	2,855
Household Income >30% to <=50% HAMFI	1,995	855	2,855
Household Income >50% to <=80% HAMFI	1,690	1,850	3,535
Household Income >80% to <=100% HAMFI	370	1,895	2,265
Household Income >100% HAMFI	365	8,820	9,185
Total	6,860	13,840	20,695

Source: 2014-18 ACS CHAS

Income by Housing Problems (Renters only)	Household has at least 1 of 4 Housing Problems	Household has none of 4 Housing Problems OR cost burden not available no other problems	Total
Household Income <= 30% HAMFI	1,650	285	1,935

Household Income >30% to <=50% HAMFI	1,385	405	1,790
Household Income >50% to <=80% HAMFI	1,010	625	1,635
Household Income >80% to <=100% HAMFI	170	690	860
Household Income >100% HAMFI	145	2,045	2,190
Total	4,360	4,055	8,415

Source: 2014-18 ACS CHAS

Description of the size and demographic composition of qualifying populations within the CITY's boundaries:

Homeless as defined in 24 CFR 91.5

Each year, Continuums of Care (CoCs) across the country are required by HUD to conduct a census of who is experiencing homelessness on the last Wednesday in January. In addition to counting anyone staying in an emergency shelter on that night, outreach is conducted to identify persons spending the night outdoors or in places not meant for human habitation. The Point-in-Time (PIT) count identifies the number of people who were homeless on one particular night. By itself, it is not a reliable predictor of how many people will be homeless or receive housing resources in a year. When used along with other data, it can provide key information on the state of homelessness currently, and over time.

The 2021 Calhoun County PIT count was a particularly difficult year for collecting accurate data due to the pandemic, so the analysis of homeless needs was supplemented with 2021 data from the Calhoun County HMIS which collects data on homeless that seek services from HMIS-participating service organizations and shelters. Neither the PIT count nor HMIS include data from domestic violence shelters.

The 2021 Calhoun County PIT count showed 11 households with children were homeless and 110 adult households without children were experiencing homelessness. HMIS data show that a total of 862 individuals were considered literally homeless at some point in 2021. Of those, 603 were single adults, 106 were adults in families, 143 were children in families, and the rest were unaccompanied youth.

HMIS data suggest that African-American households and individuals with a disabling condition are disproportionately likely to experience homelessness. Whites comprised 52.65% of the literally homeless population, African-Americans 43.78%, Native American 1.38%, and Asian or Asian-American 0.69%. 53% of literally homeless have a disabling condition and 17.49% are survivors of domestic violence.

The HMIS data does not include Calhoun County domestic violence survivors and their families living in SAFE Place, Calhoun County's domestic violence shelter, as this data is maintained in a different database. SAFE Place sheltered 309 adult survivors and 256 children in the year prior to the pandemic, and have sheltered 427 this past year.

Under the McKinney-Vento Act, there is a different threshold to define homelessness, which includes hotels and doubling up with another family. Under this definition, we have roughly 3000 homeless individuals in our county—more than 950 of whom are homeless school-aged youth.

At Risk of Homelessness as defined in 24 CFR 91.5

HUD defines those at risk of homelessness as individuals and families who have an income below 30% of the area median income (AMI), do not have sufficient resources or support networks to prevent them from becoming homeless, or live with instability (e.g., moving two or more times during the last 60 days due to economic reasons).

Census data and anecdotal data suggest that thousands of households in Battle Creek meet this definition of “at risk of homelessness”. According to HUD’s 2014-2018 Comprehensive Housing Affordability Strategy (CHAS) data, Battle Creek has approximately 2,440 households that earn at or below 30% of AMI and have one or more housing problems. These households are at a greater risk of housing instability or homelessness. A 2019 Housing Needs Assessment found that only 885 rental housing units in Battle Creek were affordable for the 3,890 low-income renter households in the Battle Creek Area. Numerous supportive service agencies report families struggling with housing costs and stressed the need for more affordable housing in consultations.

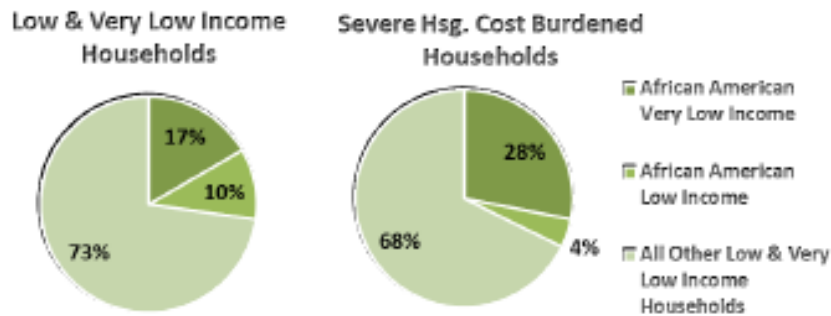
The CHAS data does not reflect the impacts of the COVID-19 pandemic. CERA rental assistance program data show that in the past year 2,300 applications for rental assistance have been completed and 1,800 households have received assistance. Another 800 cases are currently open and are in various stages of the application process.

Low and very low-income African Americans in Battle Creek have a significantly greater likelihood of experiencing severe housing cost burden than whites and other minority residents with similar incomes. The following passage from the City’s 2020 Consolidated plan explains:

“CHAS data tables reflect that 27.3% of African Americans paid more than 50% of their monthly income on housing—11.1 percentage points higher than what residents of all races experience.

This disparity is in part driven by income as African Americans make up a disproportionate amount of low- and very low-income households. African Americans make up 17.6% of Battle Creek households but constitute 27% of low- and very low-income households. However, as the second pie chart in Figure 9 shows, even when income is controlled for, African Americans—particularly very low-income African Americans, are more likely to be severely housing cost burdened. Figure 9 shows that 28% of severely housing cost burdened households are very low-income African Americans despite making up just 17% of low and very low-income families.

Figure 9: Low Income African American Households as a Percentage of Low Income and Severely Housing Cost Burdened Households of Any Race



The implication for Community Development programming is that resources that are targeted at low- and very low- income households without regard to race should be monitored to ensure that an equitable distribution occurs. Further, an equitable distribution should result in the percentage of African American households served correlating with their representation amongst cost burdened households (32%), rather than the total population (17.6%).”

A particular concern expressed regularly during consultations, was the challenge many low income families are having getting landlords to rent to them—even if they have a rent voucher or some other form of assistance. This is particularly true for families that have credit issues, complicated rental histories, or a disability. Here are some of the comments that reflect this point:

“Need more affordable housing, particularly housing that meets the needs of people with complicated rental histories or a disability that may result in them being perceived as high risk.”

“Need housing that will accept vouchers and subsidies. Consider using HOME-ARP or CDBG funding to do outreach and help public housing clients use choice vouchers.”

“Need more information about why landlords are not accepting vouchers and what would get them to consider changing their practice.”

“Need more service/housing navigation. Landlords are increasing rents, rates dramatically increasing.”

“Landlords not accepting vouchers has been a problem.”

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

The demographic characteristics of this population are less well known due to the safety and privacy concerns surrounding domestic violence and human trafficking situations. Local domestic violence shelter statistics from 2019 show 8,074 total shelter nights, with 217 adult

clients served and 183 children sheltered. A total of 1,103 clients received legal advocacy, and 962 received crisis information or referrals. As mentioned in a previous section, 17.49% of homeless individuals report being survivors of domestic violence or sex trafficking—a number that doesn't include clients served by the domestic violence shelter, which if included would dramatically increase the percentage.

Consultations with DV shelter staff revealed the following:

“Need a separate shelter space for victims of sex trafficking. Need both temporary shelter space and permanent housing placement. Domestic violence rates have been way up during the pandemic. Having a really hard time placing people in housing from the shelter—mostly due to inability to locate housing that will accept vouchers. Too many complexes will not accept vouchers.”

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

Factors considered for the other three qualifying populations apply for this group as well—in particular the extent of housing cost burden amongst this population, the disparate impact on African-American households, and the challenges around the ability to get landlords to rent to households with complicated histories.

A group that was regularly discussed in consultations that might not always fit into one of the other qualifying populations are individuals or householders that struggle with addiction or mental illness. The City's 2019 Public Engagement Survey for its 2020 Consolidated Plan had nearly a thousand residents rate 38 community development needs and found that mental health services was the top priority—elevated from the 8th highest priority in 2014.

Consultations with service providers surfaced the following concerns:

“Need more supports to address the barriers of addiction and mental health issues. Studies from Center of Disease Control and Kaiser Family Foundation show rates of issues with substance abuse and/or mental health were already increasing before the pandemic and have skyrocketed as a result of the stress and social isolation associated with the pandemic.

Economic Roundtable estimates the chronically homeless population with increase by 49% in next four years. Locally, these findings are validated by the Calhoun County Community Health Needs Assessment that ranked mental health and substance abuse issues as two of the highest priority needs in Calhoun County”.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing (Optional):

Haven at Rest Ministries (homeless shelter) has 49 beds in its men's emergency shelter for men without children, 8 emergency beds for women without children, and 9 units/31 beds in its emergency shelter for women with children. The Haven provides comprehensive services to homeless individuals and families from emergency shelter, food, temporary and transitional housing, and substance abuse treatment and case management.

SAFE Place (DV shelter) has 11 units/46 beds in its emergency shelter for women with children and 8 beds for women without children. Survivors of domestic violence are provided emergency shelter, counseling, legal advocacy, and transitional services by S.A.F.E. Place.

Since the 2021 housing inventory was completed, the Battle Creek Homeless Shelter (BCHS) opened providing additional beds for both men and women. The BCHS is a low barrier shelter-defined as a facility that does not require that people be sober, compliant with mental health or addiction treatment plans, or agree to participate in programs to receive services and housing support. BCHS is the only low barrier shelter in West Michigan.

The Share Center provides a Drop-In Resource Center that houses a Community Inclusion Program to provide safety, access to services and meals to homeless individuals. The Share Center in the past also provided a Peer Support Program to support individuals in their mental health and substance abuse recovery, but these vital services were discontinued due to lost funding.

Neighborhoods Inc. of Battle Creek serves as the Calhoun County HARA, recently administered the County's CERA rental assistance programs, and administers the City's TBRA program. The TBRA currently has multiple years of funding totaling more than \$200,000.

Other available services and resources include:

- Legal Services provides eviction diversion services and makes referrals to local housing service providers to families facing housing insecurity.
- Voces provides housing navigation and case management services as well as interpretation and advocacy support to the Hispanic/Latino population in Battle Creek.
- City of Battle Creek has an additional \$144,000 of HOME funds programmed for TBRA in its annual action plan that have yet to be committed to a sub-recipient.

Description of the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

The extent of the unmet needs for the homeless population is detailed in the previous section on the size and demographic composition for qualifying populations. If the HOME-ARP funds were heavily leveraged, a 50 to 70 unit permanent supportive housing development would have meaningful impact on the current housing need.

The following is a summary of the unmet needs that could be addressed in part by HOME-ARP funds:

- Need more deeply subsidized, affordable housing, particularly housing that meets the needs of people with complicated rental histories or a disability that may result in them being perceived as high risk.
- Need more supports to address the barriers to attaining or sustaining affordable housing such as addiction and mental health issues.
- Need permanent supportive housing, particularly for the chronically homeless and individuals with a disability.
- Need more case management and support for homeless in emergency shelters and transitional housing to assist them with finding permanent housing.
- Per available data, there is a gap of 9 emergency shelter units for homeless households with children.

At Risk of Homelessness as defined in 24 CFR 91.5

The extent of the unmet needs for households at risk of homelessness is detailed in the previous section on the size and demographic composition for qualifying populations. The needs dwarf the amount of available HOME-ARP resources. For example, the City's entire HOME-ARP allocation would be required to create just 10-15 deeply subsidized affordable housing units, while data presented suggest more than 3,000 units are needed to address the need amongst under 30% AMI households that are severely housing cost-burdened. Even if the HOME-ARP funds were heavily leveraged, 50 to 70 units would be an impressive outcome—again far short of what is needed.

The unmet needs are as follows:

- Need more deeply subsidized, affordable housing, particularly housing that meets the needs of people with complicated rental histories or a disability that may result in them being perceived as high risk.
- Need more supports to address the barriers to attaining or sustaining affordable housing such as addiction and mental health issues.
- Need additional housing navigation and case management services to encourage more landlords to participate in voucher or rental assistance programs, connect tenants to resources, and help tenants secure needed housing.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

The unmet needs are as follows:

- The priority need for this population is for transitional housing for survivors of human trafficking that is separate from the domestic violence shelter and tailored to meet their needs.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice

The unmet needs are as follows:

- Need more deeply subsidized, affordable housing, particularly housing that meets the needs of people with complicated rental histories or a disability that may result in them being perceived as high risk.
- Need more supports to address the barriers to attaining or sustaining affordable housing such as addiction and mental health issues.
- Need additional housing navigation and case management services to encourage more landlords to participate in voucher or rental assistance programs, connect tenants to resources, and help tenants secure needed housing.

Gaps identified within the current shelter and housing inventory as well as the service delivery system:

The following gaps within the current shelter and housing inventory as well as the service delivery system were identified:

- Need more deeply subsidized, affordable housing, particularly housing that meets the needs of people with complicated rental histories or a disability that may result in them being perceived as high risk.
- Need more supports to address the barriers to attaining or sustaining affordable housing such as addiction and mental health issues.
- Need permanent supportive housing, particularly for the chronically homeless and individuals with a disability.
- Need more case management and support for homeless in emergency shelters and transitional housing to assist them with finding sustainable housing.
- There is a gap of 9 emergency shelter units for homeless households with children.
- Need additional housing navigation and case management services to encourage more landlords to participate in voucher or rental assistance programs, connect tenants to resources, and help tenants secure needed housing.
- Need transitional housing for survivors of human trafficking that is separate from the domestic violence shelter and tailored to meet their needs.

Explain how the City determined the level of need and gaps in the City's shelter and housing inventory and service delivery systems based on the data presented in the plan:

In addition to feedback received through surveys and consultation sessions, a number of data sources and community plans were reviewed to determine the needs and system gaps for HOME-ARP qualifying populations. The following plans and data sources were consulted:

- City of Battle Creek 2020 Consolidated Plan
- Calhoun County Homeless Coalition Plan to End Homelessness
- Calhoun County Community Health Needs Assessment (2022)
- 2019 Battle Creek Community Housing Needs Assessment
- 2014-2018 Comprehensive Housing Affordability Strategy (CHAS) data
- Calhoun County Continuum of Care (CoC) 2021 Point-in-Time (PIT) count
- Calhoun County CoC 2021 HMIS report

HOME-ARP Activities

Description the method(s) used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

A scorecard was created to assist with evaluating and selecting project proposals for HOME-ARP funding that aligned with the findings and strategic priorities of the HOME-ARP allocation plan. The scorecard was created by a group made up of three City Community Development staff and five members of the Housing Solutions Board, the executive board of the Calhoun County Homeless Coalition, using a strategic planning application call Allowance. A HOME-ARP strategic scoring guide was created that articulated the strategic priorities and objectives of the HOME-ARP funding along with weights and outcome criteria for evaluating proposals

A request for proposals was issued on March 10, 2022 for HOME-ARP projects/programs. The guide was disseminated with the RFP so that proposing agencies could align their proposals with the HOME-ARP priorities and objectives. A pre-submission conference was held on March 24, 2022 for interested agencies. Nine projects/program proposals were submitted by the April 14 deadline, totaling roughly four million dollars in requests. A review committee made up of city staff and non-participating representatives of the Homeless Coalition reviewed and scored proposals using the scorecard. Once projects were scored, the committee developed an allocation budget to include in the City's HOME-ARP allocation plan, and a roster of projects to recommend for award upon approval of the allocation plan by the City Commission and HUD.

This strategy of issuing an RFP before submitting the allocation plan to HUD is unorthodox but has advantages. It ensures that the City has the capacity to implement proposed project ideas by identifying capable sub-recipients early. It allowed the City to base its determinations around instituting preferences or limitations on actual project proposals rather than trying to make guesses or basing decisions on generic program ideas. It will also expedite the process of allocating resources to sub-recipients once approval is secured.

Description of whether the City will administer eligible activities directly:

The City will not administer projects directly. A group of agencies have been preselected to administer activities on the City's behalf via an RFP process

No HOME-ARP administrative funds were provided to a sub-recipient or contractor prior to submission or approval of the City's allocation plan.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 594,090		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 365,000		
Non-Profit Operating	\$ #	0 %	5%
Non-Profit Capacity Building	\$ #	0 %	5%
Administration and Planning	\$ 135,268	12.36 %	15%
Total HOME ARP Allocation	\$ 1,094,358		

Describe how the City will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

The City intends to fund six projects with its HOME-ARP funds. \$365,000 will be awarded to a developer to provide gap funds on 50 to 60 unit permanent supportive housing development. \$594,090 will be awarded to agencies to provide supportive services to qualifying populations including:

- Substance abuse recovery
- Peer support and recovery coach services at a drop in center
- Housing case management and housing navigation services at the HARA to assist TBRA (HOME-funded) and Housing Choice voucher users secure housing
- Housing case management at the low barrier shelter to assist clients in securing permanent housing
- Case management services for a transitional home for women to assist them in removing barriers to long-term sustainable housing.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

The City's allocation plan addresses two of the most significant findings of the gap analysis:

1. The permanent supportive housing development addresses the lack of permanent supportive housing for homeless and extremely low-income families and individuals with a complicated rental history or disability. It also contributes to a solution for the extremely high levels of housing cost burden amongst 0-30% median income households.
2. The various supportive services funded address the barriers and challenges homeless and extremely low income families face in securing housing, even when they are in possession of a housing choice or TBRA voucher.

While there is a large gap (over 3000 households) of affordable housing for families under 30% median income, the City didn't opt to fund TBRA assistance because that type of assistance is currently in surplus and underutilized within the city. It is expected that by funding more supportive services these rental assistance funds will be activated.

HOME-ARP Production Housing Goals

Estimated number of affordable rental housing units for qualifying populations that the City will produce or support with its HOME-ARP allocation:

An estimated 55 units of permanent supportive housing will be created. 550 individuals or households will receive supportive services that result in them securing or sustaining themselves in affordable rental housing.

Description of the specific affordable rental housing production goal that the City hopes to achieve and describe how the production goal will address the City's priority needs:

An estimated 55 units of permanent supportive housing will be created. These units will provide housing for families and individuals that struggle the most to secure and sustain themselves in housing

Preferences and Limitations

The HOME-ARP Strategic Priority Guide articulates the priorities for the City's HOME-ARP funding along with weights and outcome criteria for evaluating proposals. The scorecard and guide do not include any limitations, but do include preferences for proposals that serve or impact qualifying populations. The scorecard incorporates multiple preferences in each qualifying population category including but not limited to chronically homeless, homeless, homeless families, unaccompanied homeless youth, veterans, domestic violence survivors, and families and individuals at risk of homelessness. The full list of preferences are included in detail in the priority guide.

The six projects the City intends to fund were selected using the priority guide, but that is the extent of the preferences that will be applied. Funded activities or projects will not give preference to any qualifying populations or subpopulations within qualifying populations. The only limitation will be to restrict admission to HOME-ARP funded rental housing to households who need the specialized supportive services that are provided in such housing. Other than that, all qualifying populations will be eligible for all funded activities and projects. This means that all qualifying populations are eligible for funded supportive services.

The method of prioritization for all activities and projects will be first come, first serve. Activities and projects funded by HOME-ARP funds will not use Coordinated Entry (CE) as the sole referral source and any referrals from CE will not be given priority over other individuals or households from qualifying populations.

HOME-ARP Refinancing Guidelines

The City does not intend to use HOME-ARP funds to refinance existing debt of any kind.

Application for Federal Assistance SF-424

* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision		* If Revision, select appropriate letter(s): <div style="border: 1px solid black; height: 15px; width: 100%;"></div> * Other (Specify): <div style="border: 1px solid black; height: 15px; width: 100%;"></div>																	
* 3. Date Received: <div style="background-color: yellow; border: 1px solid red; height: 15px; width: 100%;"></div>		4. Applicant Identifier: <div style="border: 1px solid black; height: 15px; width: 100%;"></div>																			
5a. Federal Entity Identifier: <div style="border: 1px solid black; height: 15px; width: 100%;"></div>			5b. Federal Award Identifier: <div style="border: 1px solid black; padding: 2px;">M-21-MP_26-0203</div>																		
State Use Only:																					
6. Date Received by State: <div style="border: 1px solid black; width: 80px; height: 15px;"></div>		7. State Application Identifier: <div style="border: 1px solid black; width: 250px; height: 15px;"></div>																			
8. APPLICANT INFORMATION:																					
* a. Legal Name: <div style="border: 1px solid black; padding: 2px;">City of Battle Creek</div>																					
* b. Employer/Taxpayer Identification Number (EIN/TIN): <div style="border: 1px solid black; padding: 2px;">38-6004523</div>			* c. UEI: <div style="border: 1px solid black; padding: 2px;">DAZVMCFXKJT7</div>																		
d. Address:																					
<table style="width: 100%;"><tr><td style="width: 15%;">* Street1:</td><td><div style="border: 1px solid black; padding: 2px;">10 North Division Street</div></td></tr><tr><td>Street2:</td><td><div style="border: 1px solid black; height: 15px; width: 100%;"></div></td></tr><tr><td>* City:</td><td><div style="border: 1px solid black; padding: 2px;">Battle Creek</div></td></tr><tr><td>County/Parish:</td><td><div style="border: 1px solid black; padding: 2px;">Calhoun</div></td></tr><tr><td>* State:</td><td><div style="border: 1px solid black; padding: 2px;">MI: Michigan</div></td></tr><tr><td>Province:</td><td><div style="border: 1px solid black; height: 15px; width: 100%;"></div></td></tr><tr><td>* Country:</td><td><div style="border: 1px solid black; padding: 2px;">USA: UNITED STATES</div></td></tr><tr><td>* Zip / Postal Code:</td><td><div style="border: 1px solid black; padding: 2px;">49014-4004</div></td></tr></table>						* Street1:	<div style="border: 1px solid black; padding: 2px;">10 North Division Street</div>	Street2:	<div style="border: 1px solid black; height: 15px; width: 100%;"></div>	* City:	<div style="border: 1px solid black; padding: 2px;">Battle Creek</div>	County/Parish:	<div style="border: 1px solid black; padding: 2px;">Calhoun</div>	* State:	<div style="border: 1px solid black; padding: 2px;">MI: Michigan</div>	Province:	<div style="border: 1px solid black; height: 15px; width: 100%;"></div>	* Country:	<div style="border: 1px solid black; padding: 2px;">USA: UNITED STATES</div>	* Zip / Postal Code:	<div style="border: 1px solid black; padding: 2px;">49014-4004</div>
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County/Parish:	<div style="border: 1px solid black; padding: 2px;">Calhoun</div>																				
* State:	<div style="border: 1px solid black; padding: 2px;">MI: Michigan</div>																				
Province:	<div style="border: 1px solid black; height: 15px; width: 100%;"></div>																				
* Country:	<div style="border: 1px solid black; padding: 2px;">USA: UNITED STATES</div>																				
* Zip / Postal Code:	<div style="border: 1px solid black; padding: 2px;">49014-4004</div>																				
e. Organizational Unit:																					
Department Name: <div style="border: 1px solid black; padding: 2px;">Community Services</div>			Division Name: <div style="border: 1px solid black; padding: 2px;">Community Development</div>																		
f. Name and contact information of person to be contacted on matters involving this application:																					
Prefix: <div style="border: 1px solid black; padding: 2px;">Mr</div>		* First Name: <div style="border: 1px solid black; padding: 2px;">Chris</div>																			
Middle Name: <div style="border: 1px solid black; height: 15px; width: 100%;"></div>																					
* Last Name: <div style="border: 1px solid black; padding: 2px;">Lussier</div>																					
Suffix: <div style="border: 1px solid black; height: 15px; width: 100%;"></div>																					
Title: <div style="border: 1px solid black; padding: 2px;">Community Development Manager</div>																					
Organizational Affiliation: <div style="border: 1px solid black; padding: 2px;">City of Battle Creek</div>																					
* Telephone Number: <div style="border: 1px solid black; padding: 2px;">269-966-3267</div>			Fax Number: <div style="border: 1px solid black; height: 15px; width: 100%;"></div>																		
* Email: <div style="border: 1px solid black; padding: 2px;">cplussier@battlecreekmi.gov</div>																					

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U.S Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnership Program

*** 12. Funding Opportunity Number:**

* Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

HOME-ARP activities will include administration, supportive services, and rental housing development.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="1,094,358.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value=""/>
* g. TOTAL	<input type="text" value="1,094,358.00"/>

* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:

* First Name:

Middle Name:

* Last Name:

Suffix:

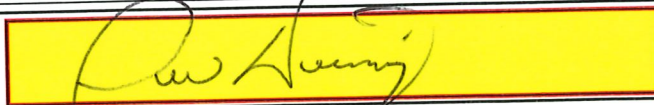
* Title:

* Telephone Number:

Fax Number:

* Email:

* Signature of Authorized Representative:



* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

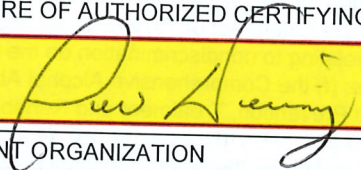
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE City Manager
APPLICANT ORGANIZATION City of Battle Creek	DATE SUBMITTED 09/16/2022

HOME-ARP CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

Uniform Relocation Act and Anti-displacement and Relocation Plan --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

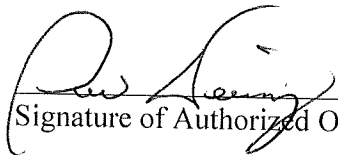
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

Section 3 --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

HOME-ARP Certification --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.

 FOR:

Signature of Authorized Official

9/16/2022
Date

City Manager

Title

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

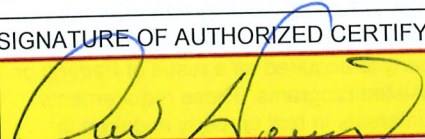
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

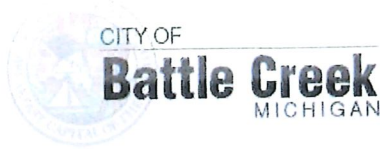
NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE City Manager
APPLICANT ORGANIZATION City of Battle Creek	DATE SUBMITTED 09/21/2022



Resolution

NO. 246

A Resolution authorizing legal signatures in the absence of the City Manager.

BATTLE CREEK, MICHIGAN - 10/4/2016

Resolved by the Commission of the City of Battle Creek:

That Ted Dearing, Assistant City Manager - Community and Economic Development and Linda Morrison, Finance Director, are authorized, respectively, to sign any and all documents on behalf of the City Manager during any period she is absent from the City, effective October 5, 2016.

I, Victoria Houser, City Clerk of the City of Battle Creek, hereby certify the above and foregoing is a true and correct copy of a Resolution adopted by the Battle Creek City Commission at a Regular meeting held on October 4, 2016.

Victoria L. Houser
Victoria Houser

Battle Creek City Commission
10/4/2016

Action Summary

Staff Member: Michelle Culp

Department: City Manager

SUMMARY

A Resolution authorizing legal signatures in the absence of the City Manager.

BUDGETARY CONSIDERATIONS

HISTORY, BACKGROUND and DISCUSSION

The administration needs authorization in place for legal signatures on behalf of the City in the absence of the City Manager.

DISCUSSION OF THE ISSUE

POSITIONS

ATTACHMENTS:

File Name

Description

No Attachments Available