



HOME INVESTMENT PARTNERSHIPS
AMERICAN RESCUE PLAN (HOME-ARP)

Allocation Plan

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Introduction

The City of Kalamazoo will receive \$1,881,648 in Home Investment Partnerships - American Rescue Plan (HOME-ARP) funds from the U.S. Department of Housing and Urban Development (HUD). This supplemental funding was allocated by formula under the HOME entitlement program to address the need for homelessness assistance and supportive services. The allocation, authorized by the American Rescue Plan Act of 2021, must primarily benefit individuals and families who are experiencing homelessness, at risk of homelessness, or in other vulnerable populations at greatest risk of housing instability.

This plan includes 1) an outline of the consultation and public participation processes undertaken, 2) an assessment of the needs of qualifying populations and gaps in local housing and services systems, and 3) planned uses of HOME-ARP funds for prioritized populations and eligible activities.

Consultation

Agency/Organization Consulted	Type of Agency/Organization	Method of Consultation	Feedback
Kalamazoo County Continuum of Care	CoC represented orgs that cover all qualifying populations	Interview, written correspondence	Data provided on shelter and housing needs. Changing needs as pandemic has shifted.
YWCA Kalamazoo	Domestic Violence Service Provider	Interview	Lack of affordable units combined with other barriers (evictions, poor credit, etc) is biggest issue.
Integrated Services of Kalamazoo	Homeless Service Provider, mental health authority, service provider covering all qualifying populations and other populations as defined in the HOME-ARP notice, people with a disability	Interview, written correspondence	Intensive supportive services are critical. Regularly have open beds for individuals and families in shelters. Roughly 10% of all ISK clients identify as homeless. Barrier to using vouchers is finding landlords who accept rent cap.
Housing Resources, Inc.	Housing agency, HARA, service provider covering all qualifying	Standing meetings, ongoing collaboration	Ongoing need for supportive services as CERA concluded.

	populations and other populations as defined in the HOME-ARP notice		Rental and utility assistance a high priority for those at-risk of homelessness.
Kalamazoo Housing Commission	Public Housing authority	Interview	Affordable housing is greatest need. Recommends SRO unit model with intensive supportive services.
Fair Housing Center	Organization that addresses fair housing, civil rights, and needs of persons with disabilities	Written correspondence	There is a city ordinance that prohibits discrimination based on source of payment, but they have struggled to enforce the ordinance. They have seen an increase in cases where landlords refused or mishandled reasonable accommodation requests.
CDAAC	Volunteer committee, represents community input	Standing meetings, ongoing collaboration	Prioritizes funding grassroots organizations. Use funds to address historic inequities and marginalized communities.
Kalamazoo Collective Housing	Homeless service provider	Written correspondence	Shared resources as tactic to create sustainable, affordable housing.
Kalamazoo Shelter Providers	Coc membership group, represented orgs provide services to all qualifying populations	Presentation	Presented information about HOME-ARP funds, eligible uses. Conversation around broad need for supportive services in Kalamazoo.
Home Start Initiative	Homeless service provider	Written correspondence	Works to address the supportive service needs of homeless individuals as they work

			to become rehoused. Proponent of tiny home model. Prioritizes equity as it relates to meeting the needs of homeless individuals.
Zero Day	Veterans group, homeless service provider	Interview	Need for veteran housing in Kalamazoo. High need for supportive services for veterans. Chronically homeless veterans see Kalamazoo as an appealing place to be because services are easily accessible when available.
Helping Other People Exceed (HOPE) Thru Navigation	Homeless service provider	Written correspondence	Prioritized outreach efforts. Focus on re-entry after homelessness. Views tiny homes as good affordable housing strategy. High need for supportive services.
Mt. Zion Church	Service provider	Standing meeting	High priority given to creating affordable units.
Galilee Baptist Church	Service provider	Standing meeting	See affordable housing as high community need.

Methods and Feedback

The City of Kalamazoo consulted with the agencies listed above beginning in summer 2021 and concluding in fall 2022. Consultations took place via interview, written correspondence, standing meetings, and ongoing collaboration.

Feedback gathered through the consultation process was used to inform establishment of priority needs for qualifying populations and the writing of the funding application used to solicit HOME-ARP project proposals. Based on consultations, it was determined that all four eligible HOME-ARP uses would be included in the funding application.

Public Participation

Public Participation Process

On January 30, 2023, a notice regarding availability of the draft HOME-ARP Allocation Plan was published in *The Kalamazoo Gazette*. The plan was available for review and comment from January 30 to March 2, 2023, and a public hearing was scheduled for February 23, 2023 and rescheduled to March 2, 2023 due to unforeseen weather closure. The hearing was held in person at City Hall.

City of Kalamazoo 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, affordable housing developers, housing advocates, community members and other interested parties were invited to participate to ensure feedback represented diverse perspectives.

During the consultation and data gathering phase of creating the City's allocation plan, the City held its public hearings on April 28th, 2022 and May 2nd, 2022 on community development needs for its annual action plan. Staff solicited 64 community organizations to participate in the public engagement process and provide input on community needs. Data from this public process was considered in the preparation of this plan.

Efforts to broaden public participation

In addition to the outreach conducted by City staff, survey data gathered by the Upjohn Institute in conjunction with the Continuum of Care and other services providers, was used to inform decision-making. The survey was conducted March through May 2022 and received 169 responses. According to the Kalamazoo County Housing Plan, "The intent of this survey was to document the housing characteristics and preferences of unhoused residents of Kalamazoo County. Survey questions focused on the impacts of programs and services, needs that are not being met, clarifying past and present housing challenges, getting feedback on housing priorities, and determining how different demographic groups are impacted by the housing crises. Information gathered from this survey was used to inform content in the Kalamazoo County Housing Plan." More specifics about survey methodology can be found in the Kalamazoo County Housing Plan (<https://bit.ly/3iQKc53>). Community Planning and Economic Development staff participated in the Kalamazoo County Housing Plan Steering Committee. The process and information gathered in the efforts to create the County Housing Plan have been an integral part of informing HOME-ARP public participation and project selection.

Summary of Comments Received

No public comments were received.

Summary of Comments Not Accepted

All comments were accepted.

Needs Assessment and Gap 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.

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	# of Units
Emergency Shelter	231	49	372	0	0								
Transitional Housing	44	20	26	0	12								
Permanent Supportive Housing	256	71	147	147	0								
Other Permanent Housing	71	23	69	69	0								
Sheltered Homeless						143	216	24	36				
Unsheltered Homeless						0	124	3	12				
Current Gap										-88	-29	-32	124

Data Sources: PIT Count, CoC Housing Inventory Count

Income by Housing Problems (Owners and Renters) In HAMFI	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%	4,895	1,360	6,255
Household Income >30% to <=50%	3,335	1,680	5,020
Household Income >50% to <=80%	1,655	4,675	6,325
Household Income >80% to <=100%	355	2,520	2,875
Household Income >100%	275	8,255	8,530
Total	10,510	18,495	29,005

Source: 2015-2019 ACS CHAS

Income by Housing Problems (Renters Only) In HAMFI	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%	4,180	1,125	5,305
Household Income >30% to <=50%	2,590	930	3,525
Household Income >50% to <=80%	1,095	2,525	3,615
Household Income >80% to <=100%	220	1,175	1,395
Household Income >100%	130	2,225	2,355
Total	8,215	7,985	16,200

Source: 2015-2019 ACS CHAS

Size and Demographic Composition of Qualifying Populations

Sheltered and Unsheltered Homeless

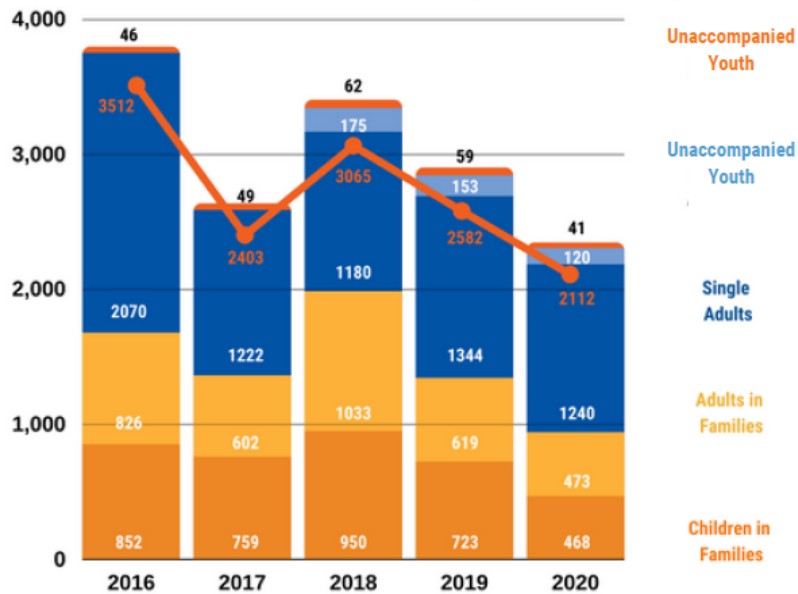
Each year, Continuums of Care (CoCs) across the country are required by HUD to conduct a census of who is experiencing homelessness on the last Wednesday in January. In addition to counting anyone staying in an emergency shelter on that night, outreach is conducted to identify persons spending the night 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 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 CoC did not conduct an unsheltered count in 2021 due to COVID-19 concerns. Shelter capacity was decreased during the 2021 sheltered count, but according to the 2021 CoC Annual Report, there was about an 80% utilization rate for non-domestic violence shelter beds, and a 74% utilization rate for transitional housing programs serving veterans and youth.

The 2022 Kalamazoo County PIT count continued to face difficulty collecting data due to the pandemic, resulting in numbers that do not accurately represent the size of the homeless population in Kalamazoo. The 2022 PIT count showed 40 households with children and 334 adult households were experiencing homelessness.

The image below shows the number of individuals who resided in a shelter, transitional housing program, or unsheltered program for at least one night for the years 2016 through 2020. The numbers are likely underestimates as they only capture households which have interacted with homeless service providers who use HMIS. Many more households within the county are living in unstable, unsafe, and unaffordable housing conditions.

Image 1: Literal Homeless Count (2016-20)



Note: Unaccompanied youth age 18-24 were not tracked in a separate category prior to 2018; these youth are included in the single adult category for the years 2016-2017. Individuals may be represented in multiple categories as households shift over time. The solid orange line represents the total unduplicated count of homeless individuals in all categories.

Source: Image is from p. 3 Kalamazoo County Continuum of Care 2021 Annual Report

The Homeless Management Information System (HMIS) is the local information technology system used to collect client-level data and data on the provision of services to the homeless and those at risk of homelessness. According to Kalamazoo County HMIS data, in calendar year 2020, 2,112 total individuals experienced literal homelessness. This included 1,240 single adults, 473 adults and 468 children in families, 120 unaccompanied youth age 18-24, and 41 unaccompanied youth under the age of 18.

The majority (56%) of the literally homeless population identified as Black or African American, while 40% identified as white. An additional 2% identified as American Indian or Alaskan Native and less than .5% identified as another non-white race. Approximately 4% identified their ethnicity as Hispanic/Latin(a)(o)(x), compared to nearly 96% who identified as non-Hispanic/Non-Latin(a)(o)(x). These racial disparities manifest differently across household types. Homeless single adults are more likely to be white, with 51% identifying as Black or African American, while adults and children in families and unaccompanied youth are more likely to identify as Black or African American. The largest disparity is found among homeless children, with Black or African American children making up over 80% of all children in families and unaccompanied youth under the age of 18.

About 42% of all homeless persons indicate that they have at least one disabling condition, with the highest rate among adults without children (53%). A total of 464 individuals have been identified as chronically homeless, meaning they are in a household with at least one adult

member with a disability and have been homeless for at least 12 continuous months or at least four times in the past three years, totaling 12 months. Three hundred forty-three individuals were seniors age 55 or older, and 88 individuals were identified as veterans. Additionally, 33.5% of all homeless individuals indicate they have been a survivor of domestic violence, with domestic violence experiences most prevalent among adults in families with children. Kalamazoo consults with the local YWCA for details regarding those who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by HUD in the HOME-ARP Notice.

At Risk of Homelessness

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 Kalamazoo meet this definition of “at risk of homelessness”. According to HUD’s 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data, Kalamazoo has approximately 5,010 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. The CHAS data does not reflect the impacts of the COVID-19 pandemic. CERA rental assistance program data show that from March 2021 to December 2022, 10,600 applications for rental assistance were approved. The need for CERA rental assistance from over 10,000 households indicates that there has been an increase in those who can be considered at risk of homelessness since 2015-2019 CHAS data was released.

In 2020, according to HMIS data, 1,008 households were served in homelessness prevention projects within Kalamazoo County because they were at risk of homelessness as defined in 24 CRF 91.5. These households likely underrepresent the total extent of households at-risk of homelessness within the County. 400 households were adult-only, comprising of 510 adults, and 608 households were families with children comprising of 806 adults and 1,362 children. Most family households were headed by a single female. The majority (61.5%) of individuals identified as Black or African American, with 26.4% identifying as white, 9.4% identifying with multiple race categories, and less than 2% identifying as American Indian, Alaska Native, or Indigenous, Asian or Asian American, and Native Hawaiian or Pacific Islander. Approximately 5.1% identified as Hispanic/Latin(o)(a)(x), compared to 93.4% Non-Hispanic/Non-Latin(o)(a)(x). Adult-only households were more likely to identify as white and non-Hispanic/non-Latin(o)(a)(x).

Nearly 92% did not identify with having at least one disability, and nearly 15% indicated they were a survivor of domestic violence. Adult-only households were more likely to indicate having at least one disability (16%) and less likely to indicate they were a survivor of domestic violence (9%).

At Risk of Housing Instability

Those who are at risk of housing instability are often low-income, earning less than 30% or 50% of the area median income (AMI) and experience cost burden or severe cost burden. Having a sufficient supply of affordable housing units is essential to ensuring housing stability. Public housing and voucher programs can provide housing affordability for those at risk of instability.

City of Kalamazoo Income Distribution by Tenure						
	Owner		Renter		Total	
0-30% AMI	950	7.4%	5,305	32.7%	6,255	21.6%
30-50% AMI	1,495	11.7%	3,525	21.8%	5,020	17.3%
50-80% AMI	2,710	21.2%	3,615	22.3%	6,325	21.8%
80-100% AMI	1,480	11.6%	1,395	8.6%	2,875	9.9%
Greater than 100% AMI	6,175	48.2%	2,355	14.5%	8,530	29.4%
Total	12,810	100%	16,200	100%	29,005	100%

Source: ACS CHAS 2015-2019

There are approximately 4,180 renter 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.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

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 2021 show over 39,000 hours housing clients in shelters, with 568 clients supported for intimate partner violence, 438 clients supported after sexual assault, and 83 clients supported to protect from labor and sex trafficking. 47% of clients identified as persons of color. As mentioned in a previous section, nearly 15% of homeless individuals report being survivors of domestic violence or sex trafficking, which does not include clients served by the domestic violence shelter.

Current Resources Available to Qualifying Populations

A summary of housing resources is provided below in the housing inventory count. More detail is provided in the narrative in this section.

Housing Inventory Count (2022)					
	Family Units	Family Beds	Adult-Only Beds	Child-Only Beds	Veteran Beds
Emergency Shelter	49	231	372	13	0
Transitional Housing	20	44	26	0	12
Rapid Re-Housing	23	76	51	0	5
Permanent Supportive Housing	71	256	147	0	0

Other Permanent Housing	23	71	69	0	0
Total Beds	186	678	665	13	17

Source: Kalamazoo County CoC HIC 2022

The Kalamazoo Gospel Mission is an emergency shelter in downtown Kalamazoo. The Kalamazoo Gospel Mission provides shelter to adults and families with children as well as comprehensive services such as food, clothing, substance abuse recovery, and case management.

YWCA Kalamazoo provides comprehensive, free services to survivors of domestic violence, human trafficking and sexual assault. YWCA has a 52 bed emergency shelter for victims of domestic violence and their dependent children, a 12 bed shelter for labor and sex trafficking survivors, 7 transitional supportive housing units for survivors, and 4 permanent supportive housing units. YWCA also provides comprehensive supportive services including food, clothing, emergency transportation, legal services, advocacy, case management, and therapy.

Housing Resources, Inc (HRI), which is the Kalamazoo County HARA, provides financial assistance and intensive case management services for 55 scattered site rental units for families where a family member has a disabling condition. HRI's housing stabilization services help people address the many problems that lead to housing crises. Professional housing specialists offer information, referrals, case management and other services to renters facing short-term crises. In addition to working with local landlords, HRI offers 68 one, two, and three-bedroom units for low-income households at Rosewood Community and 49 efficiency units for single adults, including many who are living with physical and/or mental illness at The Rickman House in downtown Kalamazoo. HRI recently administered the County's CERA rental assistance program and administers the City's CDBG-CV rental assistance program. The CDBG-CV program currently has just under \$1 million in assistance available.

Integrated Services of Kalamazoo (ISK) is Kalamazoo's mental health authority and operates a number of housing programs through their Housing Recovery Center. ISK operates four shelters: Oakland House, for single adults, Step-Up, for families, Keystone, for veterans, and Homeless Emergency Response for emergency situations.

Open Doors Kalamazoo offers housing and personal support to help individuals and families find housing stability. They operate 2 shelters and 96 rental units. Separate shelters for men and women offer residential programs designed to provide safe housing while searching for employment or saving money for a more permanent housing solution. Rental units are private rooms, studios, and one, two and three-bedroom apartments for low-wage working individuals and families priced out of the housing market. Residents pay a monthly program fee which includes housing, all or most utilities, and personal support and assistance.

The Catholic Charities Diocese of Kalamazoo operates The Ark Youth Services, which provides crisis intervention, short-term shelter, transitional housing, and supportive services to homeless youth and families in crisis. The shelter provides emergency stays of up to 21 days. Youth

Independent Living provides homeless youth ages 16-21 with up to 18 months of transitional housing. During their time in the program, each youth works with a case manager to develop a plan that will promote their independence. Plans may include finding permanent housing, education, and employment. The Ark Cottages nine units of permanent supportive housing for older homeless youth, ages 18-24 when entering the program. Youth create a housing plan and receive services to help them be successful in their new home.

In addition to the resources listed above, the City of Kalamazoo has prioritized creation of affordable housing units in the coming years. It is anticipated that 300 new affordable housing units will be available by late 2024. While these are not targeted specifically to the HOME-ARP qualifying populations, they will certainly have an impact on increasing access to and attainability of affordable housing among the qualifying populations.

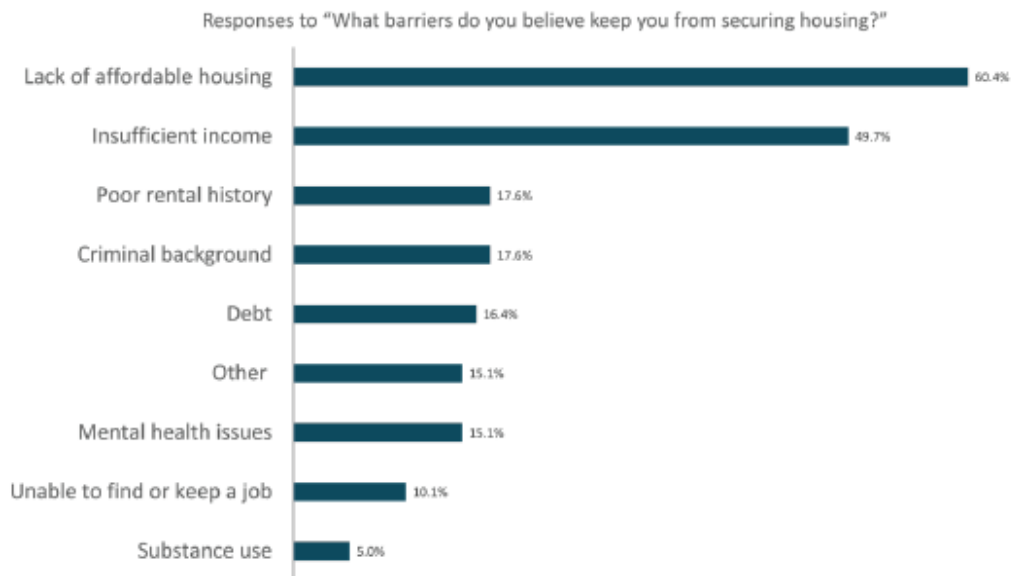
Priority Needs for Qualifying Populations

The housing and supportive service needs of qualifying populations overlap across populations and are like the needs of the overall low-income population. Using information from the consultation process in conjunction with the results of the Kalamazoo County Housing Plan survey, it was determined that the highest need for HOME-ARP funding was supportive services.

According to the Kalamazoo County Housing Plan the top housing concerns among all survey respondents were “affordable housing for low income, unhoused, and vulnerable families; supportive services (mental health, financial literacy, etc.); and more units; followed closely by more transitional or temporary housing for those currently unhoused” (Kalamazoo County Housing Plan, p. 8). These identified goals align with the allowable uses for HOME-ARP funding.

According to the Kalamazoo Unhoused Survey results, cited in the County Housing Plan, most homeless respondents stated that rental financial assistance and pre-rental programs to improve likelihood of securing housing were the top priorities (Kalamazoo County Housing Plan, p. 9). When asked about barriers to securing housing, the two most common responses were lack of affordable housing and insufficient income. The image below provides a more complete picture of frequency and variety of responses.

Chart 28: Responses to “What Barriers Do You Believe Keep You From Securing Housing?”

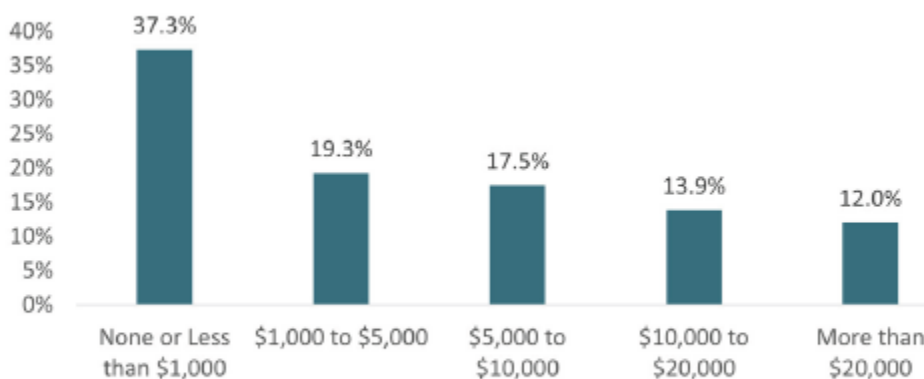


Source: Kalamazoo County Unhoused Survey

Source: Image from p. 63 of Kalamazoo County Housing Plan

The need for supportive services aimed at helping clients gain employment or increase income demonstrated in the image below, taken from the Kalamazoo County Housing Plan. Over 70% of respondents in the Kalamazoo County Unhoused Survey had an income of less than \$10,000 in the 12 months prior to the survey. Providing case management and other supportive services will help identify and address the unique barriers homeless individuals and families face when trying to secure and maintain housing.

Chart 24: Income of Unhoused Individual During the Past 12 Months



Source: Kalamazoo County Unhoused Survey

Source: Image from p. 61 of Kalamazoo County Housing Plan

Households at risk of housing instability need support to stay housed. While many families may gain stability through housing assistance, other families need more affordable housing options. However, most of these households also need a livable wage and supportive services to create long-term self-sufficiency.

Gaps within Current Shelter, Housing, and Service Delivery Systems

The following table identifies beds and units available in the homelessness system for families and adults on a year-round basis.

Housing Inventory Count (2022)					
	Family Units	Family Beds	Adult-Only Beds	Child-Only Beds	Veteran Beds
Emergency Shelter	49	231	372	13	0
Transitional Housing	20	44	26	0	12
Rapid Re-Housing	23	76	51	0	5
Permanent Supportive Housing	71	256	147	0	0
Other Permanent Housing	23	71	69	0	0
Total Beds	186	678	665	13	17

Source: Kalamazoo County CoC HIC 2022

Below are the number of persons in different household types identified in the annual Point-in-Time (PIT) count.

POINT-IN-TIME COUNT (2022)				
Shelter Type	Homeless Population (# of People in Households)			
	With Children	Without Children	With Only Children	Total
Sheltered - Emergency Shelter	112	204	2	318
Sheltered - Transitional Housing	31	12	3	46
Unsheltered Homeless	0	124	0	124
Total	143	340	5	488

Source: Kalamazoo County CoC PIT Count 2022

Consultations sessions and Kalamazoo County Unhoused Survey data identified gaps in the service delivery system. There is a need for intensive supportive services that address barriers to securing housing such as adequate income, poor rental history, and criminal background.

How Level of Need and Gaps were Determined

In addition to feedback received through consultation, several 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 Kalamazoo 2019 Consolidated Plan

- Kalamazoo County Continuum of Care (CoC) 2021 Annual Report
- 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data
- Kalamazoo County CoC 2016-2022 Point-in-Time (PIT) counts
- Kalamazoo County CoC 2021 HMIS report
- Kalamazoo County CoC 2022 Housing Inventory Count (HIC)
- Kalamazoo County Housing Plan
- Kalamazoo-Portage, Michigan Comprehensive Housing Market Analysis 2019

HOME-ARP Activities

Method for Soliciting Applications for Funding

A Notice of Funding Availability (NOFA) was issued on November 16, 2022, for HOME-ARP projects/programs. Information regarding the NOFA was disseminated to shelter providers and other local organizations through the CoC, a memo to the City Commission, and provided to the Community Development Act Advisory Committee (CDAAC) to share with any interested parties.

A pre-submission conference was held on November 22, 2022, for interested agencies. The pre-submission conference was attended by more than 20 local agencies. Four program proposals were submitted by the December 14 deadline, two of which were eligible programs totaling over \$2.2 million in requested funding. A review committee made up of city staff and CDAAC members reviewed and score proposals.

The strategy of issuing the NOFA and making funding selections prior to submission of the allocation plan to HUD is unusual, but useful. It ensures that the City has to capacity to implement proposed project ideas by identifying capable subrecipients early. It allowed the City to base determination of preferences or limitations on actual project proposals rather than on educated guesses based on generic program design. It will also expedite allocation of resources to subrecipients once approval is secured.

The results of the NOFA process are summarized in the table and narrative below.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 1,257,401		
Tenant Based Rental Assistance (TBRA)	\$ 342,000		
Administration and Planning	\$ 282,247	15%	15%
Total HOME ARP Allocation	\$ 1,881,648		

The City intends to fund three projects with its HOME-ARP funds.

Upon HUD approval of the City of Kalamazoo HOME-ARP Allocation Plan, New Genesis, Inc. will be awarded \$588,730 for supportive services to qualifying populations including:

- Employment assistance and job training
- Mental health services
- Transportation

Upon HUD approval of the City of Kalamazoo HOME-ARP Allocation Plan, Integrated Services of Kalamazoo will be awarded \$342,000 for Tenant Based Rental Assistance for qualifying populations and \$668,671 for supportive services to qualifying populations including:

- Employment assistance and job training
- Housing search and counselling services
- Life skills training
- Mental health services
- Outreach services
- Transportation
- Case management
- Utility assistance

Rationale for Identified Funding and Activities

The consultation process and gap analysis showed a need for supportive services and additional rental assistance for those experiencing homelessness. These gaps are reflected in the distribution of HOME-ARP funds above. The various supportive services funded address the barriers and challenges homeless and extremely low-income families face in securing housing.

The majority of funds are allocated to supportive services as there has been an increase in local rental assistance for those at risk of eviction and/or homelessness in response to COVID-19. Due to the historic investment in eviction and homelessness prevention programs in response to the COVID-19 pandemic, HOME-ARP funds are not prioritized for those at risk of homelessness. The most pressing need for housing assistance and services is among those experiencing homelessness.

Describe whether PJ Will Administer 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 application process.

HOME-ARP Administration Funds

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

Preferences and Referral Methods

The City of Kalamazoo intends to give preference for HOME-ARP funded activities to homeless individuals and families as defined in 24 CFR 91.5 (1). This includes individuals or families who lack a fixed, regular, and adequate nighttime residence. Preference will not be given to specific subpopulations.

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.

Addressing Unmet Needs and Gaps for Qualifying Populations

100% of HOME-ARP funds will benefit individuals and families in qualifying populations, with the preference for those experiencing literal homelessness. The HOME-ARP funding will help the City of Kalamazoo fill a critical gap for those experiencing homelessness, however even with this resource the need will not be fully met. Persons who do not qualify under the homeless preference will have the opportunity to participate in all HOME-ARP activities and will not be excluded because of any protected characteristics or preferential status.

Affordable Rental Housing Production Goal

The City of Kalamazoo does not intend to use HOME-ARP funds to create or support affordable rental housing units.

HOME-ARP Refinancing Guidelines

The City of Kalamazoo does not intend to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

*** If Revision, select appropriate letter(s):**

*** Other (Specify):**

*** 3. Date Received:**

4. Applicant Identifier:

MI233222

5a. Federal Entity Identifier:

38-6004627

5b. Federal Award Identifier:

M21-MP260207

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

City of Kalamazoo

*** b. Employer/Taxpayer Identification Number (EIN/TIN):**

38-6004627

*** c. UEI:**

X441PAK5LL66

d. Address:

*** Street1:**

241 West South Street

Street2:

*** City:**

Kalamazoo

County/Parish:

*** State:**

MI: Michigan

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

49007

e. Organizational Unit:

Department Name:

Community Planning & Economic Development

Division Name:

Community Investment

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

*** First Name:**

Mackenzie

Middle Name:

*** Last Name:**

Rosenberg-Scholte

Suffix:

Title:

Compliance Specialist I

Organizational Affiliation:

*** Telephone Number:**

269-337-8781

Fax Number:

*** Email:**

rosenbergsscholtem@kalamazoocity.org

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:

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 tenant based rental assistance.

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

6th

* b. Program/Project

6th

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

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

05/01/2023

* b. End Date:

09/30/2030

18. Estimated Funding (\$):

* a. Federal

1,881,648.00

* b. Applicant

* c. State

* d. Local

* e. Other

* f. Program Income

* g. TOTAL

1,881,648.00

*** 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 218, 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:

Antonio

Middle Name:

* Last Name:

Mitchell

Suffix:

* Title:

Community Planning and Economic Dev. Director

* Telephone Number:

269-337-8165

Fax Number:

* Email:

mitchella@kalamazoocity.org

* Signature of Authorized Representative:

* Date Signed:

3/14/23

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
	Director of CPED
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Kalamazoo	3/16/23

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.


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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).
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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 Director of CPED
APPLICANT ORGANIZATION City of Kalamazoo	DATE SUBMITTED 3/16/23

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.



Signature of Authorized Official

3/14/23

Date

Director of CPED

Title