



Kent County Community Action

Annual Action Plan

July 1 2019 through June 30 2020

An Element of the
Consolidated Housing and Community
Development Five-Year Strategic Plan

July 1 2016 through June 30 2021

121 Franklin Street SE • Suite 110 • Grand Rapids, MI 49507 • Phone: (616) 632-7950 • Fax: (616) 632-7955

We work to eliminate the causes and circumstances of poverty by investing in individuals and families with lower incomes. Through dedicated staff and community partnerships we provide services, resources, education and advocacy to improve the quality of life for all residents of Kent County.



Executive Summary

AP-05 Executive Summary - 91.200(c), 91.220(b)

1. Introduction

Kent County Community Action (KCCA) along with the City of Grand Rapids and the City of Wyoming, adopted the 2016-2020 Kent County and Cities of Grand Rapids and Wyoming Regional Consolidated Plan. Kent County's 2019-2020 Fourth Program Year Action Plan is based upon the adopted Regional Consolidated Plan's goals, objectives and priority needs. This Action Plan outlines the programs to be initiated in the upcoming fiscal year.

KCCA will have \$2,922,708.00 available for the Community Development Programs during the period July 1, 2019 through June 30, 2020. This amount consists of \$2,822,708.00 in an estimated annual grants from the U.S. Department of Housing and Urban Development and \$100,000.00 from anticipated program income. Any increase or decrease in funding to match actual allocation amounts will be equitably divided between programs, excluding Public Services and Administrative activities.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The primary objective of HUD's Entitlement Programs is to develop viable communities through the provision of decent housing, a suitable living environment, and expanded economic opportunities. To this end, Kent County and the cities of Grand Rapids and Wyoming identified eight shared goals that address current and anticipated community development needs. Although, given local conditions, each jurisdiction may place different emphasis on specific goals, the framework that has been developed recognizes shared opportunities and challenges.

- **Goal 1: Improve the Condition of Existing Housing.** Rehabilitate and preserve owner- and renter-occupied housing to bring units to code standard or provide safety improvements, energy efficiency improvements, access modifications, or treatment of lead or other home hazards.
- **Goal 2: Increase the Supply of Affordable Housing.** Create affordable housing through new construction and rehabilitation for homeowners and renters, including permanent supportive housing.
- **Goal 3: Improve Access to and Stability of Affordable Housing.** Increase opportunities for housing stability through homebuyer down payment assistance, tenant based rental assistance and other support; fair housing education and enforcement, legal assistance for housing matters, and financial/homeownership counseling. Assist homeless individuals and families to stabilize in permanent housing after experiencing a housing crisis by providing client-

appropriate housing and supportive service solutions; and provide homeless households with rapid re-housing rental assistance to move them as quickly as possible into permanent housing.

- **Goal 4: Reduce Blight and Code Violations.** Improve public health and safety, reduce blighting influences, and improve property values through code enforcement and clearance of blighted structures or structures in flood-prone areas.
- **Goal 5: Increase Civic Engagement and Public Safety.** Supports: 1) quality of life and sense of community in neighborhoods by decreasing or preventing crime; 2) neighborhood leadership and civic engagement as the means to build great neighborhoods; and 3) disaster mitigation and planning activities.
- **Goal 6: Enhance Infrastructure and Public Facilities.** Enhance publically-owned facilities and infrastructure such as parks, streets, sidewalks, streetscapes and other public infrastructure and facilities, including improving accessibility to meet Americans with Disabilities Act (ADA) standards.
- **Goal 7: Increase Access to Jobs, Education and Other Services.** Increase access to jobs, education, health and wellness, recreation, and health and social service activities.
- **Goal 8: Increase Economic Opportunities.** Enhance economic stability and prosperity by increasing economic opportunities for residents through job readiness and skill training, promotion of entrepreneurship (including among culturally diverse populations), façade improvements, and other strategies.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The Kent County Community Action recognizes that the evaluation of past performance plays a critical role in ensuring that effective programs are implemented that align with its long range goals. The following includes FY 2018 activities from July 1, 2018 through June 30, 2019 and FY 2017 activities from July 1, 2017 through June 30, 2018. A total of \$3,776,011.55 was allocated, including \$1,707,448.96 from FY 2017 and \$2,068,562.59 from FY 2018, towards projects in the community. (see list below)

FY 2018 activities

- Tyrone Twp - Cleanup Campaign - \$5,500.00
- Kentwood Cty - Veterans Park Splashpad - \$739,710.00
- Cedar Springs – ADA Sidewalk Installation - \$462,350.02
- Fair Housing Center - Program \$20,000.00
- Hope Network - North Kent Transit \$137,842.00
- Senior Neighbors - Senior Housing Advocate \$65,000.00
- Home Repair Services - Access Modification \$50,000.00
- Home Repair Services - Minor Home Repair \$150,000.00

- Kent County Community Action - Moderate Homeowner Rehab \$40,045.00
- Kent County Community Action - CDBG General Admin \$347,119.04
- Kent County Community Action - Rehab General Admin \$30,996.53
- Fair Housing Center - Administration \$20,000.00

FY 2017 activities

- Tyrone Twp - Fire & Rescue \$16,345.13
- Gaines Twp - 60th St Sidewalk \$45,097.00
- Kentwood Cty - Activities Center Remodel \$611,513.71
- Walker Cty - Wilson Ave Sidewalk Construction \$219,492.50
- Kent City Village - Leaver Park Well project \$14,856.00
- Fair Housing Center - Program \$20,000
- Hope Network - North Kent Transit \$137,842
- Senior Neighbors - Senior Housing Advocate \$61,000
- Home Repair Services - Access Modification \$100,000
- Home Repair Services - Minor Home Repair \$100,000
- Kent County Community Action - Lead Assessment \$6,134
- Kent County Community Action - Moderate Homeowner Rehab \$29,507.62
- Kent County Community Action - CDBG General Admin \$283,096
- Kent County Community Action - Rehab General Admin \$57,421
- Fair Housing Center - Administration \$20,000

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The public hearing draft of the 2019-2020 Annual Action Plan element of the 2016-2021 Consolidated Plan document was initially made available for the 30-day public comment period on April 9, 2019 and a revised draft made available for the 30-day public comment period on July 10, 2019. The initial "Notice of Public Hearing and Notice of Public Availability" was published in The Grand Rapids Press on March 26, 2019 and a second notice on July 3, 2019. Public hearings were held on April 26, 2019 and on July 25, 2019 to review the draft 2019-2020 Annual Action Plan element of the 2016-2021 Consolidated Plan document was made available to the public at the Kent County Community Action office located at 121 Franklin Street SE, Suite 110, Grand Rapids, MI 49507, the Grand Rapids Public Library –Main Branch, Reference Desk 111 Library Street NE, Grand Rapids, MI 49503 and on www.accesskent.com.

The initial public hearing on the 2019-2020 Annual Action Plan element of the 2016-2021 Consolidated Plan document was held on April 26, 2019 at 3:00 p.m. in the offices of the Kent County Community

Development Department at 121 Franklin Street SE, Suite 110, Grand Rapids, MI 49507. There being no persons present to provide input, the public hearing was closed at 4:00 p.m.

The second public hearing on the 2019-2020 Annual Action Plan element of the 2016-2021 Consolidated Plan document was held on July 25, 2019 at 12:00 p.m. in the offices of the Kent County Community Development Department at 121 Franklin Street SE, Suite 110, Grand Rapids, MI 49507. There being no persons present to provide input, the public hearing was closed at 1:00 p.m.

No written comments were received in response to the initial "Notice of Public Hearing and Notice of Public Availability" published in The Grand Rapids Press on March 26, 2019.

No written comments were received in response to the second "Notice of Public Hearing and Notice of Public Availability" published in The Grand Rapids Press on July 3, 2019.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

No written comments were received in response to the "Notice of Public Hearing and Notice of Public Availability" published in The Grand Rapids Press on March 26, 2019.

No public comments were given during the Public Hearings and no further follow up during the public comment period was given.

6. Summary of comments or views not accepted and the reasons for not accepting them

No public comments were given during the Public Hearings or received in writing. KCAA has not identified any denial or refusal of comments.

7. Summary

No public comments were given during the Public Hearings or received in writing during the public comment period.

PR-05 Lead & Responsible Agencies - 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	KENT COUNTY	Kent County Community Action
HOME Administrator	KENT COUNTY	Kent County and City of Wyoming Consortium
ESG Administrator	KENT COUNTY	Kent County Community Action

Table 1 – Responsible Agencies

Narrative

The Lead Agency is Kent County Community Action. The daily CDBG activities will be handled by Community Action. The Kent County Board of Commissioners, Community Action Agency Advisory Board and Governing Board serves as the legislative and policy-making voice of the County. As part of its annual activities, the County Board of Commissioners adopted the Five-Year Regional Consolidated Plan and all three Governing entities will approve the annual submittal for CDBG, HOME, and ESG funding. As the Chief administrator, the County Administrator is responsible for the day-to-day operations of Kent County, including the implementing of the policies and programs of Community Action.

Consolidated Plan Public Contact Information

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AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

During the Regional Consolidated Plan process, there was extensive engagement with residents and community organizations in the identification of housing and community development needs and priorities. This process included stakeholder interviews, surveys and stakeholder focus groups. Kent County Community Action continues to reach out and consult with other public and private agencies during the Annual Action Plan process. Our Subrecipients of CDBG funds are non-profit agencies, including the Fair Housing Center of West Michigan who provides fair housing testing and complaint followup services; Home Repair Services who provides minor home repairs and accessibility modifications; Hope Network who provides transportation services to senior citizens and disabled individuals; Senior Neighbors who provides supportive living and development for senior citizens of Kent County; Community Rebuilders who provides permanent supportive housing and the City of Grand Rapids Housing Rehabilitation Department who will provide contracted services to conduct Lead risk assessments throughout Kent County. Our Subrecipients of HOME funds are non-profit agencies including, LINC Community Revitalization Inc. and the Inner City Christian Federation who will provide rehab and new construction for single and multifamily units for qualifying low-mod residents of Kent County.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).

Kent County Community Action will continue to work with Local Units of Government that participate in the Urban County, City of Grand Rapids, City of Wyoming and area housing non-profits, such as the Fair Housing Center of West Michigan, Home Repair Services, Hope Network, LINC and the Inner City Christian Federation. Kent County partners with the Health Department on the Lead Task In addition, the Director of Kent County Community Action serves on the steering committee for the Grand Rapids Area Coalition to End Homelessness/HUD Continuum of Care to address issues of homelessness and affordable housing.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

Through HOME & CoC funds, Kent County will fund Community Rebuilders through their permanent supportive housing sponsored based rental assistance and tenant based rental assistance by way of The Heart of West Michigan United Way. The Director of Kent County Community Action serves on the steering committee for the Grand Rapids Area Coalition to End Homelessness/HUD Continuum of Care. She also serves as a member of the Kent County Essential Needs Task Force Governance Board. Funding will continue to be provided to Community Rebuilders who will administer subsistence payments for rental assistance to low-income persons pending eviction for the purpose of preventing homelessness. Kent County will continue to consider the needs of at-risk populations and cooperate in metropolitan initiatives.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

Kent County Community Action will develop a plan to access the funds per grant guidelines with the input of the local CoC. During the process, KCCA will develop performance standards for and evaluate outcomes of the activities assisted by ESG funds. Additionally, KCCA will develop funding, policies and procedures for the operation and administration of the HMIS system. KCCA will operate the program internally to coincide with the additional programs that are operated with local and federal homeless prevention dollars.

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Community Rebuilders
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Community Rebuilders provides permanent supportive housing. This organization was consulted as part of our Housing Needs Assessment and Regional Consolidated Plan. They provide Housing First training nationally and serve as members of the Continuum of Care Steering Committee.
2	Agency/Group/Organization	Fair Housing Center of West Michigan
	Agency/Group/Organization Type	Service-Fair Housing Regional organization
	What section of the Plan was addressed by Consultation?	Fair Housing
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Fair Housing Center of West Michigan will provide fair housing complaint investigation services and fair housing training. This organization was consulted as part of our updated Analysis of Impediments to Fair Housing Choice and Housing Needs Assessment and Regional Consolidated Plan.

Identify any Agency Types not consulted and provide rationale for not consulting

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	The Heart of West Michigan United Way	Affordable HUD Continuum of Care administration to support the Coalition to End Homelessness goals.

Table 3 – Other local / regional / federal planning efforts

Narrative

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AP-12 Participation - 91.401, 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The citizen participation process for the Annual Action Plan was completed according to the Kent County Community Action Citizen Participation Plan.

The public hearing draft of the 2019-2020 Annual Action Plan element of the 2016-2021 Consolidated Plan document was initially made available for the 30-day public comment period on April 9, 2019 and a revised draft made available for the 30-day public comment period on July 10, 2019. The initial "Notice of Public Hearing and Notice of Public Comment" was published in The Grand Rapids Press on March 26, 2019 and a second notice was published on July 3, 2019. The public hearing draft 2019-2020 Annual Action Plan element of the 2016-2021 Consolidated Plan document was made available to the public at the Kent County Community Action Department, 121 Franklin Street SE, Suite 110, Grand Rapids, MI 49507, the Grand Rapids Public Library –Main Branch, Reference Desk 111 Library Street NE, Grand Rapids, MI 49503 and on www.accesskent.com. A public hearing on the 2019-2020 Annual Action Plan element of the 2016-2021 Consolidated Plan document was held on April 26, 2019 at 3:00 p.m. in the offices of the Kent County Community Action Department at 121 Franklin Street SE, Suite 110, Grand Rapids, MI 49507. There being no persons present to provide input, the public hearing was closed at 4:00 p.m. A second public hearing was held at 12:00 p.m. at the same location. There being no persons present to provide input, the public hearing was closed at 1:00 p.m. No written comments were received in response to the "Notice of Public Hearing and Notice of Public Comment" published in The Grand Rapids Press on March 26, 2019 or the second notice published on July 3, 2019.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	None.	None.	None.	
2	Newspaper Ad	Non-targeted/broad community	None.	None.	None.	
3	Public Meeting	Non-targeted/broad community	None.	None.	None.	
4	Public Hearing	Non-targeted/broad community	None.	None.	None.	

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

Introduction

Kent County Community Action, along with the City of Grand Rapids and the City of Wyoming, adopted the 2016-2020 Kent County and Cities of Grand Rapids and Wyoming Regional Consolidated Plan. Kent County 2018-2019 Third Program Year Action Plan is based upon the adopted Regional Consolidated Plan's goals, objectives and priority needs.

Kent County Community Action expects to have \$2,110,114.80 available for the Community Development Program during the period July 1, 2019 through June 30, 2020. This amount consists of \$1,442,623.60 in an estimated annual CDBG entitlement grant from the U.S. Department of Housing and Urban Development and \$45,000 from anticipated program income, \$602,491.20 in HOME Investment Partnership funds and \$20,000 from anticipated program income. This budget plans for 100% of the funds to benefit low and moderate income persons.

Funding for total administrative activities (General Administration and HUD Continuum of Care Administration) shall not exceed the federal restrictions of 20% of the total grant award plus program income for CDBG and 10% of the total grant award plus program income for HOME (of

grant year). Kent County projects the total available to be expensed for administrative activities at \$359,773.84

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,756,819	45,000	497,294	2,299,113	0	Block grant from U.S. Department of Housing and Urban Development to address housing, community development and economic development needs.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	916,592	55,000	0	971,592	0	Grant from U.S. Department of Housing and Urban Development to address affordable housing needs. *Wyoming HOME funds are a part of these available funds via the Consortium.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	149,297	0	136,428	285,725	0	Grant from U.S. Department of Housing and Urban Development to address emergency rental assistance needs in the community.

Table 2 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The jurisdictions leverage Federal resources against other sources of federal, state, local and private funding to maximize the impact of CDBG and HOME. Leveraging varies from activity to activity depending on the project scope. For instance, the Federal Low Income Housing Tax Credit (LIHTC), Historic Tax Credits, and various affordable housing loan and grant products from the Federal Home Loan Bank can be leveraged with HOME funding to develop affordable housing. The Jurisdictions routinely fund affordable housing and other activities for which partners bring additional resources.

Although the CDBG program does not require a match, both Kent County and the City of Grand Rapids administer HOME programs that require matches. The HOME program requires a 25% non-federal cash or non-cash match of the annual grant amount, entitlement, less 10% for administration and 5% for CHDO operating support. In Kent County's case, the match may be in the form of Low-Income Housing Tax Credits, state funded Medicaid services, volunteer labor and donated goods and services for HOME eligible projects located in our service area. As a rule, no County of Kent general fund dollars need be used to meet the match. Grand Rapids expects matching funds to come from non-cash resources such as property tax abatements granted to previously-funded HOME projects.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

N/A

Discussion

N/A

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Improve the Condition of Existing Housing	2016	2020	Affordable Housing		Maintenance of Owner-Occupied Housing Minor and Emergency Housing Repairs Permanent Supportive Housing	CDBG: \$280,000	Homeowner Housing Rehabilitated: 111 Household Housing Unit
2	Increase the Supply of Affordable Housing	2016	2020	Affordable Housing		Development of Quality Affordable Rental Housing Development of Affordable Owner-Occupied Housing Permanent Supportive Housing	HOME: \$824,933	Homeowner Housing Added: 4 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Improve Access/Stability of Affordable Housing	2016	2020	Affordable Housing Homeless		Access to and Stability of Affordable Rental Housi Fair Housing and Consumer Legal Services Regional Response to Addressing Housing Instabilit	CDBG: \$40,000 ESG: \$285,725	Public service activities other than Low/Moderate Income Housing Benefit: 1500 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 143 Households Assisted Homelessness Prevention: 176 Persons Assisted
6	Enhance Infrastructure and Public Facilities	2016	2020	Non-Housing Community Development		Public Infrastructure and Facility Improvements, i Accessibility Improvements to Public Facilities	CDBG: \$631,604	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 12668 Persons Assisted
7	Increase Access to Jobs, Education & Other Service	2016	2020	Non-Homeless Special Needs Non-Housing Community Development		Access to Job Training and Job Readiness Training Job Creation Commercial Building Improvements Economic Opportunities Diversity	CDBG: \$211,385	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 8820 Persons Assisted

Table 3 – Goals Summary

Goal Descriptions

1	Goal Name	Improve the Condition of Existing Housing
	Goal Description	Rehabilitate and preserve owner- and renter-occupied housing to bring units to code standard or provide safety improvements, energy efficiency improvements, access modifications, or treatment of lead or other home hazards.
2	Goal Name	Increase the Supply of Affordable Housing
	Goal Description	Create affordable housing through new construction and rehabilitation for homeowners and renters, including permanent supportive housing.
3	Goal Name	Improve Access/Stability of Affordable Housing
	Goal Description	<p>Increase opportunities for housing stability through homebuyer down payment assistance, tenant based rental assistance and other support; fair housing education and enforcement, legal assistance for housing matters, and financial/homeownership counseling.</p> <p>Assist homeless individuals and families to stabilize in permanent housing after experiencing a housing crisis by providing client-appropriate housing and supportive service solutions; provide homeless households with financial and other assistance to move them as quickly as possible into permanent housing.</p>
6	Goal Name	Enhance Infrastructure and Public Facilities
	Goal Description	Enhance publically-owned facilities and infrastructure that improves the community and neighborhoods, such as parks, streets, sidewalks, streetscapes and other public infrastructure and facilities, including improving accessibility to meet American with Disabilities Act (ADA) standards.
7	Goal Name	Increase Access to Jobs, Education & Other Service
	Goal Description	Increase access to jobs, education, health and wellness, recreation, and health and social service activities.

AP-35 Projects - 91.420, 91.220(d)

Introduction

The County of Kent's (herein referred to as Kent County, the County, or the Consortium) FY 2019-2020 Fourth-Year Action Plan covers the time period from July 1, 2019 through June 30, 2020. The Annual Action Plan describes the County's activities under the Urban County Consortium and planned initiatives to meet the National Objective of benefitting low- and moderate-income persons in Kent County.

The goals of the Consortium include the following:

- Create Suitable Living Environments,
- Develop Quality Affordable Housing Opportunities, and
- Stabilize Communities through Partnerships and Target Development

These initiatives will be administered by the Kent County Community Development Department (KCCD) through contracts with non-profit service agencies and development partners. All activities will be carried out as prescribed by the U.S. Department of Housing and Urban Development (HUD) in accordance with the federal regulations. The services and development projects in the upcoming fiscal year are determined by the citizens of the 33 local units of government that make up the Kent County Consortium. All cities, townships, and villages in Kent County are currently participating. The County's CDBG program also includes the western half of the Village of Casnovia, which is located in Muskegon County. The cities of Grand Rapids and Wyoming are Participating Jurisdictions and therefore excluded from the County Consortium

Kent County anticipates receiving \$45,000 of CDBG program income and \$20,000 HOME program income during the course of FY2019. When this program income is received by the County, the County will either amend existing projects or create a new project to include the program income received during FY2019.

#	Project Name
1	Infrastructure and Public Facilities
2	Sidewalks & Non-Motorized Trails
3	Public Services
4	CDBG - General Program Administration
5	HOME - General Program Administration & Activities
6	Housing Rehabilitation
7	ESG - General Program Administration & Activities

Table 4 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

AP-38 Project Summary
Project Summary Information

1	Project Name	Infrastructure and Public Facilities
	Target Area	
	Goals Supported	Enhance Infrastructure and Public Facilities
	Needs Addressed	Public Infrastructure and Facility Improvements, i
	Funding	CDBG: \$397,750
	Description	Development, reconstruction and upgrade of water infrastructure reliability and quality. Reconstruction of street and sidewalks to increased accessibility for residents. Enhancement of storm sewer infrastructure to reduce flood risk. Boiler replacement at community building to increase energy efficiency Fire protection equipment for fire firefighters to respond to and fight fires.
	Target Date	5/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 7,762 persons live in the census tracts were this project will take place.
	Location Description	Village of Casnovia, Tyrone Township, & City of Kentwood
	Planned Activities	Reconstruct street infrastructure, purchase necessary fire protection equipment, replace boiler in a community building, & repairs to existing sewer systems.
2	Project Name	Sidewalks & Non-Motorized Trails
	Target Area	
	Goals Supported	Enhance Infrastructure and Public Facilities
	Needs Addressed	Public Infrastructure and Facility Improvements, i Accessibility Improvements to Public Facilities Access to Public Services Improved Access to Jobs
	Funding	CDBG: \$1,100,000
	Description	Development, reconstruction and upgrade of sidewalks to provide new and increased accessibility for residents of several communities throughout the County as part of a County-wide sidewalk initiative. Installation of ADA walking path and pavilion area at park and baseball fields.
	Target Date	5/31/2021

	Estimate the number and type of families that will benefit from the proposed activities	Approximately 16,213 persons live in the census tracts were this project will take place.
	Location Description	Project will take place in the Village of Casnovia, Village of Sparta, City of Rockford, City of Walker, and Alpine Township.
	Planned Activities	Countywide sidewalk construction/replacement initiative in five communities.
3	Project Name	Public Services
	Target Area	
	Goals Supported	Increase Access to Jobs, Education & Other Service
	Needs Addressed	Fair Housing and Consumer Legal Services Supportive Services and Special Needs Housing Access to Public Services Transportation Services
	Funding	CDBG: \$170,000
	Description	Public service activities that include senior outreach efforts & housing services, fair housing efforts, and transportation services for seniors and persons with disabilities.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	Seniors, persons with disabilities, and individuals countywide impacted by violations of fair housing laws.
	Location Description	Countywide.
	Planned Activities	The planned activities will provide service to Seniors that meet qualification for housing assistance and intergration assistance in the community, transportation services for seniors and disabled individuals and fair housing assistance, education and support in Kent County.
4	Project Name	CDBG - General Program Administration
	Target Area	
	Goals Supported	Increase Access to Jobs, Education & Other Service

	Needs Addressed	Maintenance of Owner-Occupied Housing Minor and Emergency Housing Repairs Maintenance of Rental Housing Development of Quality Affordable Rental Housing Development of Affordable Owner-Occupied Housing Access to and Stability of Affordable Rental Housing Fair Housing and Consumer Legal Services Supportive Services and Special Needs Housing Prevention of Homelessness Public Infrastructure and Facility Improvements, i Accessibility Improvements to Public Facilities Access to Public Services Transportation Services Improved Access to Jobs
	Funding	CDBG: \$351,363
	Description	Funding towards the administration of Kent County CDBG funded activities.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	County program wide CDBG administrative support.
	Location Description	The primary office location is 121 Franklin, Grand Rapids Michigan. However, staff at multiple locations may provide CDBG administrative support.
	Planned Activities	Planned activities include administrative funding towards the Fair Housing Center of West Michigan and the administration of the FY 2019 CDBG projects and activities.
5	Project Name	HOME - General Program Administration & Activities
	Target Area	
	Goals Supported	Improve the Condition of Existing Housing Increase the Supply of Affordable Housing Improve Access/Stability of Affordable Housing

	Needs Addressed	Maintenance of Owner-Occupied Housing Maintenance of Rental Housing Development of Affordable Owner-Occupied Housing Permanent Supportive Housing Access to and Stability of Affordable Owner Housin Access to and Stability of Affordable Rental Housi Prevention of Homelessness
	Funding	HOME: \$971,592
	Description	Funding for the general administration and program activities utilizing HOME Investment Partnership grant funds.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	The planned activities that this covers will be the general administration of HOME programs which include but not limited to new construction of single family homes, rehabilaion of exisitng owner-occupied properties, tennant based rental assistnace, annual monitoring, invoice process and payments and implementation of and assistance with HUD Federal regulations pertaining to program project and outcomes.
6	Project Name	Housing Rehabilitation
	Target Area	
	Goals Supported	Improve the Condition of Existing Housing
	Needs Addressed	Maintenance of Owner-Occupied Housing Minor and Emergency Housing Repairs Maintenance of Rental Housing Housing and Other Code Violations
	Funding	CDBG: \$280,000
	Description	Programming and General Administration of the Housing Rehabilitation Program
	Target Date	6/30/2021

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Programing to occur countywide, except within the City of Wyoming and City of Grand Rapids.
	Planned Activities	This activity involves moderate/minor homeowner repair projects including but not limited to specification writing, onsite hard costs, loan assessments, access modification and project oversight and monitoring.
7	Project Name	ESG - General Program Administration & Activites
	Target Area	
	Goals Supported	Improve Access/Stability of Affordable Housing
	Needs Addressed	Supportive Services and Special Needs Housing Prevention of Homelessness
	Funding	ESG: \$285,725
	Description	To provide and administer activities to support homeless individuals and families, shelter operations, and homelessness prevention efforts.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	<i>The County will be providing Homelessness Prevention with the awarded ESG dollars to assist apprximently 176 families.</i>
	Location Description	<i>The CoC of Kent County has established centralized coordinated assessment systems that meet HUD requirements that is located at:</i>
	Planned Activities	This activity involves adminitrative and operations support for activies that support homeless individuals and families and toward homelessness prevention by providing access to safe and sanitary housing through the use of Rapid Re-housing and shelters.

AP-50 Geographic Distribution - 91.420, 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

The County of Kent's FY 2019-2020 Forth-Year Action Plan covers 33 cities, townships, and villages in Kent County and the City of Wyoming, which operates its own entitlement CDBG program. (The western half of the Village of Casnovia, which is located in Muskegon County, is also part of the County of Kent CDBG Program's jurisdiction.)

Geographic Distribution

Target Area	Percentage of Funds

Table 5 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

CDBG-funded service programs will directly benefits only low- and moderate-income homeowners and residents, including seniors and the disabled. The remaining projects are geographically targeted to primarily residential areas that have a high concentration of low- and moderate-income residents. CDBG Target Areas are determined by HUD income standards, in census tracts that have 39.06% or more of their residents classified by HUD as low- or moderate-income persons.

Discussion

n/a

Affordable Housing

AP-55 Affordable Housing - 91.420, 91.220(g)

Introduction

In alignment with the 2016-2021 Consolidate Plan, Kent County (KCAA) and the City of Wyoming jointly through the Kent HOME Consortium, will pursue multiple goals that address affordable housing during the 2019-2020 program year.

KCCA will address GOAL #1 to Improve the Condition of Existing Housing with the rehabilitation of existing units with CDBG funded activities. Urgent home maintenance assistance up to \$10,000 is available through the Minor Home Repair program for Low-to-Moderate Income (LMI) homeowners in Kent County. In addition, seniors and persons with disabilities in need of accessibility rehabilitation can receive assistance through the CDBG funded Accessibility Modification. KCCA will also identify LMI homeowners to participate in the Moderate Home Rehabilitation program for more significant rehabilitation needs up to \$25,000.

Kent County and the City of Wyoming, jointly through the Kent HOME Consortium will use its HOME to address GOAL # 2 to Increase the Supply of Affordable Housing. The Kent HOME Consortium will partner with its local Community Development Housing Organizations (CHDOS) for new development. The construction of new housing will be geographically located with the input of the Kent HOME Consortium partners, the City of Wyoming and Kent County, and will be sold to LMI eligible buyers.

Through continuation of the Tenant Based Rental Assistance (TBRA) program Kent County and the City of Wyoming, jointly through the Kent HOME Consortium will address GOAL # 3 to improve access/stability of Affordable Housing. HOME funds will be used to provide rental assistance to Kent County residents with income at our below 60% AMI that are living within Kent County, including the City of Wyoming, but outside the City of Grand Rapids, to help families access stable housing.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	113
Special-Needs	0
Total	113

Table 6 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	100
The Production of New Units	4
Rehab of Existing Units	109

One Year Goals for the Number of Households Supported Through	
Acquisition of Existing Units	0
Total	213

Table 7 - One Year Goals for Affordable Housing by Support Type

Discussion

Kent County and the City of Wyoming, through the Kent HOME Consortium, regularly seeks input from the community on projects that will further activity toward its affordable housing goals. On an annual basis Kent County seeks CDBG project applications from municipalities and local partners for consideration. Quarterly, Kent County and the City of Wyoming, through the Kent HOME Consortium, use a Request for Proposals process for the HOME program to seek projects from developers that will increase the supply of affordable housing. These practices will continue during the 2019-2020 program year.

AP-60 Public Housing - 91.420, 91.220(h)

Introduction

There are three Public Housing Authority's (PHA) located within the City of Wyoming and Kent County Kent HOME Consortium jurisdiction. This combined capacity allows jurisdiction residents to seek assistance from a variety of sources depending on their location.

Kent County Housing Commission operates as the (PHA) for Kent County. The Kent County Housing Commission provides housing assistance to low income residents through the management of 529 tenant-based Housing Choice Vouchers. (Section 8) The waiting list was last opened in 2010 and is managed based on the availability of assistance provided by HUD. Neither Kent County or Kent County Housing Commission own public housing units.

The Rockford Housing Commission (RHC) owns 52 public housing units within one apartment complex located in the City Of Rockford. These units cater specifically to the elderly and people with disabilities. The RHC manages 52 project-based Housing Choice Vouchers and its waiting is currently closed.

The Wyoming Housing Commission (WHC) owns 195 public housing units throughout the City of Wyoming. Individuals and families pay rent directly to the WHC based on their income. The WHC also administers 1,157 project-based Housing Choice Vouchers requiring households to pay a portion of their income for rent with WHC paying the balance each month. The WHC's HCV wait list was last opened in June 2011.

Actions planned during the next year to address the needs to public housing

Kent County opens the CDBG program for submission of project proposals annually and did not receive any project applications related to public housing or public owned residential building activities for this program year. The Kent County Housing Commission and City of Wyoming Housing Commission will continue to manage its Public Housing units and Housing Choice Vouchers during the upcoming program year with no anticipated changes in capacity.

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

Kent County Housing Commission operates a Family Self-Sufficiency (FSS) program for participants of the HCV program. The FSS program provides opportunity for participants to build assets and financial capacity by providing case management, homeownership counseling, and financial coaching that help participants set self-sufficiency goals. The program also contributes funds into an escrow account that can be accessed by participant after successful completion of program goals. These escrow funds may

then be used to pursue homeownership.

Both member of the Kent HOME Consortium offer opportunities for residents to direct the management of their public housing commissions. Kent County Housing Commission offers participants of the HCV program an opportunity to participate on a Resident Advisory Board. This option allows for input by participants in the planning process of the housing commission. The Wyoming Housing Commission also has a resident of the public housing program on their board and offers a homeownership program to its participants.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

None of the Public Housing Authority's operating in the City of Wyoming and Kent County Kent HOME Consortium jurisdiction have been "designated as troubled".

Discussion

Kent County consulted with the City of Wyoming and the three area PHA's to make them aware of available programs and gather input for this Annual Action plan.

AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i)

Introduction

A local coordinated central intake and referral system is used within Kent County and the City of Wyoming, Kent Home Consortium jurisdiction to access needs and prioritize housing opportunities for people at risk or experiencing homelessness. Through a designated local agency, the Housing Assessment Program (HAP) directs individuals to Kent County and City of Wyoming assistance programs.

Through the Tenant Based Rental Assistance (TBRA) program, Kent HOME Consortium funds will be used to provide financial assistance to Kent County and City of Wyoming residents. Households at risk or experiencing homelessness that are living within Kent County including the City of Wyoming, but outside the City of Grand Rapids, can receive up to 12 months of assistance with rental payments. The program also can identify available housing and provide security deposits to help families access stable housing.

Kent County also receives CoC funds to provide longer term assistance for people at risk or experiencing homelessness. The CoC TRA (Tenant Rental Assistance) program pays a portion of the monthly rent allowing participants to select units with the county. The CoC SRA (Sponsor-Based Rental Assistance) provides housing assistance in units owned by a partner organization.

Emergency Solutions Grant (ESG) funding will also be used to provide homelessness prevention services during the 2019-2020 program year. This will assist an individual or family relocate to a suitable living environment and provide financial assistance to secure stable housing.

Kent County's CDBG program provides funding that targets seniors in need of housing assistance. Elderly individuals can receive supportive counseling, housing services, and moving expense assistance to help transition into stable housing. In addition, the City of Wyoming provides CDBG programs that use a rapid rehousing approach through community partners to address the needs of people experiencing or at-risk of homelessness.

In addition, Both Kent County and the City of Wyoming, hold seats on the Essential Needs Task Force (ENTF) Governance Board, a local organization that coordinates activity with multiple agencies to ensure all resident's basic needs are met. Through the ENTF and the Continuum of Care the City of Wyoming and Kent County use their influential roles to impact the community's endeavor to end homelessness.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

A network of City of Wyoming and Kent County programs will help reduce homelessness within the combined the Kent HOME Consortium jurisdiction. By addressing Goal #3 with CDBG and ESG program

funds, Kent County will Improve the Access/Stability of Affordable Housing for people experiencing or at risk of homelessness. With the CDBG funds, the County has partnered with the Fair Housing Center of West Michigan to advocate for the fair housing rights of individuals seeking stable housing. A KCCA staff member also serves on the governing board of the Fair Housing Center to provide input into the direction of services. The ESG funded Homeless Prevention services will also be used to connect with 143 unsheltered persons to link them with local housing resources.

In addition, the City of Wyoming provides CDBG funds in support of the HUD Continuum of Care's administration. While the County's CoC program directly seeks to provide rental assistance to 93 families and maintain another 50 units for families that were previously in need of housing. The Kent County and the City of Wyoming's, Kent HOME Consortium funded Tenant Based Rental Assistance program also consistently provides housing for 150 people on monthly basis to assist the homeless and at-risk population.

Throughout the new program year, both the City of Wyoming and Kent County will continue to partner with the ENTF and participate in the Strategic Planning Body of the CoC. KCAA also maintains a designated seat on the Steering Counsel of the CoC to strengthen this partnership. This effort will further advance the efficient application, distribution and implementation of resources allocated to service providers throughout the County.

Addressing the emergency shelter and transitional housing needs of homeless persons

Primary located within the City of Grand Rapids, which independently operates its own CDBG, HOME, ESG, and CoC programs, are the area's emergency shelters. These agencies also serve families and individuals throughout Kent County and the City of Wyoming. The City of Wyoming and Kent County provide transitional housing assistance through the Kent HOME Consortiums Tenant Based Rental Assistance program. Both Kent County and the City of Wyoming will maintain their participation with the ENTF and the area HAP referral program to collaborate with the agencies that assist with and provide access to the previously highlighted programs.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The area's Continuum of Care has identified high-priority sub populations such as Veterans, chronically homeless individuals, families and youth for Rapid-Rehousing. Using the HAP assessment and referral network, the time to connect homeless and at-risk people to services is streamlined. Kent County and the City of Wyoming will support those efforts by maintaining relationships with area housing agencies

and other nearby jurisdictions. The City of Wyoming also intends to continue its CDBG funded rapid rehousing efforts to assist families experiencing homelessness.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

Kent County and the City of Wyoming directly provides and has established relationships with multiple partners to connect individuals and families with services. The use of multiple funding sources such as DOE, LIHEAP, MEAP, EFSP, CSBG, CDBG, ESG, HOME, and CSFP provide an opportunity for the combined jurisdictions to interconnect resources in order to serve the areas homeless and at-risk population.

The City of Wyoming and Kent County also maintain contractual relationships with the Fair Housing Center of West Michigan. The Fair Housing Center provides services to area residents to address fair housing needs.

Through these resources' families and individuals in the City of Wyoming and Kent County jurisdictions can receive aid such as utility assistance, meals, food distribution, foreclosure counseling, eviction assistance, and homelessness prevention. KCCA also uses CDBG, Michigan Department of Transportation, and Kent County Senior Millage funds to provide transportation services for seniors and specialized transportation for individuals with disabilities helping to connect residents with resources throughout the County.

Kent County Community Action is located in the same building that houses the County Health Department offices, Michigan Works, and State Department of Health and Human Service. This also provides KCCA an opportunity to maintain relationships and knowledge about other services to makes referrals more efficient.

Discussion

Through collaboration and access to multiple funding sources, Kent County and the City of Wyoming will continue its efforts to provide services to at-risk and homeless individuals and families.

AP-75 Barriers to affordable housing -91.420, 91.220(j)

Introduction

In order to combat the barriers families and individuals face when seeking access to affordable housing, Kent County and the City of Wyoming will continue to fund the Fair Housing Center. The Fair Housing Center will conduct testing for discrimination in housing practices and assist in training community members in Fair Housing Practices and their rights.

In addition, utilizing the Kent County and City of Wyoming's Kent HOME Consortium partnership the jurisdictions will work with our non-profit development partners to acquire and rehabilitate foreclosed housing for rental or re-sale. By providing development subsidies in more of the communities outside of the traditional hyper-segregated urban core, and inner rings of the suburban sprawl, we will be able to promote the decentralization of poverty, and create more economically integrated communities. Affordable housing will then be available to residents in throughout Kent County and the City of Wyoming.

In 2011, the County of Kent published an Analysis of Impediments (AI). Through the Consulting Firm of McKenna Associates, Inc., The County of Kent Department of Housing and Community Development conducted extensive research in preparation for the A.I. The compilation and analysis of the results of this research were the foundation for the A.I. document.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Additionally, the Five-Year Consolidated Strategy and Plan identified a number of general areas of activities wherein Kent County and the City of Wyoming could assess the negative effects of public policies, rules, and regulations on the availability of affordable housing.

Analysis of Impediments to Fair Housing in Kent County: This report identified impediments to fair housing within Kent County. Kent County and the City of Wyoming will continue to review the information and initiate actions recommended as being necessary to remove fair housing barriers.

The City of Wyoming and Kent County will also continue to support fair housing efforts, particularly through its relationship with The Fair Housing Center of West Michigan (FHCWM). The FHCWM will perform educational and testing programs throughout the Kent County and the City of Wyoming using CDBG funding.

Citizens League of Greater Grand Rapids Affordable Housing Task Force - "A Dream Deferred" (February, 1992): The Citizens League report identified a number of recommended actions for local

governments. The only recommendation addressed directly toward Kent County was to create and establish a Kent County Housing Commission. As previously indicated herein, the Kent County Board of Commissioners has created the Kent County Housing Commission, pursuant to Act 18 of the Michigan Public Acts of 1933, as amended. To date the Kent County Housing Commission has been awarded 529 Housing Choice (Section 8) Vouchers which include Family Unification Vouchers, VASH Vouchers (Veteran) and also has been awarded HUD Family Self-sufficiency Program grants for several years and in 2006 was granted the designation of Homeownership Program. These coordinated programs are focused on removing barriers to affordable housing.

Discussion

AP-85 Other Actions - 91.420, 91.220(k)

Introduction

See other actions and processes to be carried out in the narrative below.

Actions planned to address obstacles to meeting underserved needs

The County's strategy to reduce poverty relies on promoting current and future programs, which assist low-income families, the elderly, the disabled, at-risk youth and those at risk of becoming homeless.

Actions planned to foster and maintain affordable housing

The HOME Investment Partnerships Program or HOME Program was created by the National Affordable Housing Act of 1990. The purpose of the HOME Program is to increase the supply of affordable housing for low and very-low-income households. The program was designed to reinforce several important values and principles of community development:

- Provide decent, quality, affordable housing to lower-income households,
- Expand the capacity of nonprofit housing providers,
- Strengthen the ability of state and local governments to provide housing, and
- Leverage private-sector participation.
- Tenant Based Rental Assistance

As a Participating Jurisdiction, Kent County is the recipient of development formula grant programs administered by the U.S. Department of Housing and Urban Development (HUD). Kent County is the lead partner in the Kent County HOME Consortium which included the City of Wyoming. The Consortium will accept its HUD HOME Investment Partnerships (HOME) Program 2019-2020 entitlement funds in the amount of **\$916,592**. The grant funds are allocated based on the following formula

provided by HUD.

- Kent County (65% of which 15% is CHDO funds) \$618,699.60
- City of Wyoming (@25%) \$206,233.20
- Administration (@10%) \$ 91,659.20

Toward this end, the County of Kent has budgeted HOME funds for various affordable housing projects; and, has identified sources of HOME project matching contributions (cash and non-cash).

Actions planned to reduce lead-based paint hazards

In order to address the most common sources of childhood exposure to lead which are deteriorated lead-based paint and lead-contaminated dust and soil, Kent County will continue to partner with the “Get the Lead Out!” Home Repair program offered through the City of Grand Rapids in partnership with the Kent County Health Department. In addition, Kent County adheres to the environmental review policies established under NEPA on all development projects, including Homeowner Rehabilitation, Weatherization, Minor Home Repair, HOME Investment Partnerships, etc. Properties rehabilitated with CDBG/HOME funds are required to undergo lead testing and abatement when rehabilitation thresholds are met or lead testing indicates contamination. We will continue to require environmental reviews of our projects, with particular concern towards units constructed before 1978.

Kent County is currently partnering with the City of Grand Rapids Housing Rehabilitation department contracting our services for Lead Risk assessments throughout Kent County for Low-moderate homeowners.

It should also be noted that both national studies and local experience has shown that rental units have a higher prevalence of lead-based paint hazards when compared to owner-occupied units (30% and 23%, respectively). Our HOME Investment Partnership will address this by rehabilitating older properties and creating affordable rental and for-sale units that are safe for occupancy and free of lead paint hazards for low- moderate-income households. We plan to rehabilitate at least 109 units of affordable housing that will address help reduce the lead-based paint hazards. The Kent County Housing Commission will also work to eliminate the lead-based paint hazard through adherence to the Housing

Quality Standards inspections of all of the Section 8 HCV program properties.

Actions planned to reduce the number of poverty-level families

Kent County Community Action goals, programs, advocacy and policies for reducing the number of poverty-level families are to support programs that help stretch scarce resources for families and individuals living in poverty. We work to eliminate the causes and circumstances of poverty by investing in individuals and families with low incomes. For a family to pay no more than thirty percent of their income toward housing (HUD's definition of affordability) they would need a unit costing \$487 or less per month. In Kent County, the fair market rent for a one bedroom apartment is \$784 (Kent County Community Action 2019 Payment Standard) which exceeds what people earn working for minimum wage can afford, in particular when they do not get full-time hours. With the fair market rent of a two-bedroom apartment at \$966, a one-wage earner household would have to earn an annual wage of \$37,150 or \$17.86 an hour to afford a market rate apartment.

KCCA utilizes fifteen percent of its annual CDBG entitlement grant to support services in the community which are designed to increase access to basic services for very low income individuals. These services include transportation for the elderly and persons with disabilities, senior housing services for elderly citizens who have direct internal housing needs and mobility issues and provide meals for seniors in a congregate setting or delivered to their homes . In addition, housing programs offered by the KCCA through the CDBG, HOME and other HUD-funded programs assist low and moderate income individuals either directly with housing subsidies or through improvements to their living environment. By improving access to services people can gain the tools they need to meet their daily needs and those of their children.

KCCA addresses alleviation of poverty through its Family Self Sufficiency (FSS) program. Voucher holders voluntarily participate in the FSS program, in which they work with a caseworker to create a personal plan to save money, increase their education and/or job skills, and in some cases, purchase a home. KCCA also addresses direct supportive service needs through the utility services assistance program and commodity supplemental food program.

The primary factor that influences the degree of poverty is the ability of a household or individual to generate household or personal income. Private income generation is not a factor that can be directly controlled by Kent County. However, the County does involve itself in programs that have an impact,

albeit indirectly, on household or personal income

Actions planned to develop institutional structure

The Grand Rapids metropolitan area fortunately continues to have a highly committed non-profit community devoted to the housing and social service needs of low income persons and families. The private sector has also proven to be quite responsive to the housing and social needs of the area's residents, particularly the churches, local foundations, and professional associations. The greatest response from these groups has been in the area of homelessness. While most groups work primarily in the city of Grand Rapids, several have focused on out-county housing issues and concerns. The homeless advocacy groups serve residents throughout Kent County.

Kent County will continue to work to improve the institutional structure during the 2019-2020 program year in a number of important areas, including internal capacity building in the area of HOME Program administration, outreach to CHDOs, certification of CHDOs for Kent County HOME Program participation.

Actions planned to enhance coordination between public and private housing and social service agencies

Kent County will continue to work as partners on the ENTF, and participate in the Strategic Planning Body of the CoC to further advance the efficient application, distribution and implementation of resources allocated to service providers throughout the County. The Continuum of Care will receive Supportive Housing Program (SHP), and CDBG funding from the City of Grand Rapids.

Discussion

Program Specific Requirements

AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

Introduction

Information from Prior Year as No Funding Grant has been received as of March 22, 2019

The County of Kent has been notified by the U.S. Department of Housing and Urban Development (HUD) that its 2018-2019 annual entitlement grants are as follows: Community Development Block Grant (CDBG) - \$1,759,497, Home Investment Partnership (HOME) - \$979,922 and \$136,428 Emergency Solutions Grant (ESG).

This 2018-2019 budget plans for 100% of the funds to benefit low and moderate income persons.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	45,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	45,000

Other CDBG Requirements

1. The amount of urgent need activities	0
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2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.

93.00%

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

Forms of investment beyond those identified in 24 CFR 92.205 will not be utilized under this Plan.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Housing developers who are undertaking acquisition and/or rehabilitation/construction activities under a homeownership program may be assisted with HOME funds for a development subsidy and for homebuyer assistance. For units developed for rental, the County and the Developer will enter into a contract delineating the terms of development with total funds utilized secured by a promissory note for the period of affordability. For units developed for-sale, once the homebuyer closes on the property, the second mortgage and promissory note will be recorded thereby protecting the HOME development and homebuyer subsidies:

- 1) development subsidy (forgiven by Kent County)
- 2) homebuyer assistance (covered under a new silent second mortgage and promissory note from

the homebuyer to Kent County), and

3) repayment to Kent County's HOME Program.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Amount of HOME Assistance	Minimum Period of Affordability
<\$15,000	5 Years - 1/60 per month
\$15,000 - \$40,000	10 Years - 1/120 per month
>\$40,000	15 Years - 1/180 per month

If the assisted homebuyer sells the home during the applicable period of affordability, Kent County

shall recover the HOME homebuyer assistance from the net proceeds of sale, as specified in 92.254(a)(5)(ii). The amount of funds to be recaptured is based on the following: First, the HOME amount covered under the mortgage and promissory note will be reduced pro-rata based on each complete month the homebuyer has owned and occupied the house, based on the above monthly schedule.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

Activities in this Annual Action Plan do not include refinancing of existing debt secured by multifamily housing rehabilitated with HOME funds.

Emergency Solutions Grant (ESG)

1. Include written standards for providing ESG assistance (may include as attachment)

Kent County will be providing Homelessness Prevention with the awarded ESG dollars. Staff are working with consultants to establish written standards for program operations.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The CoC of Kent County has established centralized coordinated assessment systems that meet HUD requirements.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

This is not applicable as Kent County staff will be providing the services necessary to operate the

program.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

Kent County is part of the CoC which includes representation of homeless individuals or formerly homeless individuals who participate in the CoC planning process.

5. Describe performance standards for evaluating ESG.

Kent County will be providing Homelessness Prevention with the awarded ESG dollars. Staff are working with consultants to establish written standards for program operations.

n/a

