

MACOMB COUNTY 2020 ANNUAL ACTION PLAN

Executive Summary

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

1. Introduction

Macomb County (County) is an Urban County which is comprised of 21 local units of government including the Villages of Armada, New Haven, and Romeo; the Townships of Armada, Bruce, Chesterfield, Harrison, Lenox, Macomb, Ray, Richmond, Shelby and Washington; and the Cities of Center Line, Eastpointe, Fraser, Memphis, Mount Clemens, New Baltimore, Richmond and Utica. Inaugurated in 1982 in the Community Development Block Grant (CDBG) program, the County became a HOME participating jurisdiction (PJ) in 1992, and formed the Macomb HOME Consortium (MHC) in 2006, together with Roseville, Sterling Heights, and Clinton Township. During the 2013 program year, the County received its first allocation of funds through the Emergency Solutions Grant (ESG).

The 2020 Annual Action Plan (AAP) implements the County's 2019 - 2023 Consolidated Plan (Con Plan), effective from July 1, 2019 through June 30, 2023, and details the CDBG and ESG programs for the County, and the HOME program for the MHC. The 2020 AAP represents the second of the five program years covered under the Con Plan.

The Con Plan is designed to help local jurisdictions to assess their affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions. The process serves as the framework for a community-wide dialogue to identify housing and community development priorities that align and focus funding from the CPD formula block grant programs: CDBG Program, HOME Investment Partnership (HOME) Program, ESG Program and other formula program funding administered by the U.S. Department of Housing & Urban Development (HUD). The Con Plan is carried out through an AAP, which provide a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the Con Plan. Grantees report on accomplishments and progress toward Con Plan goals in the Consolidated Annual Performance and Evaluation Report (CAPER). As the Lead Agency for the MHC, the County is responsible for drafting and submitting the Con Plan. Members of the Consortium are responsible for submitting individual AAPs and CAPERS.

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 demand for programs funded by CDBG, HOME and ESG remain greater than the available funds. As such, it is the intent of the County to address each of the goals identified in the Con Plan at least once during the life of the Plan. The following is a list of the 2019 - 2023 goals that will be addressed in the 2020 AAP.

Make Available Appropriate Housing

Description: Maintenance, preservation and development of housing (owner and renter) for low- to moderate income persons.

2020 Activities: 1) Minor Home Repair (CDBG); 2) Housing Rehabilitation (CDBG & HOME); 3) Home Buyer – New Construction (HOME); and 4) Tenant Based Rental Assistance (HOME)

Improve Public Facilities and Infrastructure

Description: The Con Plan will focus on maintaining and improving existing (and creating new) public facilities and improvements that primarily serve low- to moderate-income persons, or which are located in eligible neighborhoods.

2020 Activities: 1) Center Line – Splash Pad; 2) Chesterfield Twp. – Senior Citizen Playground; 3) Eastpointe – Roxana Street Reconstruction; 4) Mount Clemens – Jones Street Utility Replacement; 5) New Haven – Sidewalk Installation Project; and 6) Shelby Twp. – Dequindre Road Sidewalks

Address the Needs of Homeless & At-Risk Families

Description: Homelessness remains an issue in Macomb County. This includes those who are sporadically homeless, temporarily housed, illegally squatting in foreclosed properties, or who have special needs.

2020 Activities: 1) Homeless Shelters: Macomb County Warming Center, MCREST, and Turning Point (CDBG); 2) Homelessness Prevention and Rapid Rehousing (ESG); and 3) Shelter Operations (ESG)

Provide and Expand Human Services

Description: Feedback indicated a strong need for improved human services, particularly as they relate to homeless individuals and families, victims of domestic violence, abused children, senior citizens and single parent households. Those affected spend inordinate amounts of time seeking essential services only to find them not offered or inaccessible.

2020 Activities: 1) Senior Activity Programs: Chesterfield Twp., Lenox Twp., Macomb Twp., Ray Twp., and Richmond; 2) Large Print Books: Shelby Twp. and Utica; 3) Dial-A-Ride: Harrison Twp. ; 4) Armada PAL and New Generation Ministries will provide summer activities for children of LMI families to; 5) Care House will assist abused children; 6) Samaritan House and the Shelby Lions Club will provide food assistance to LMI families; 7) Wigs for Kids will provide wigs and supportive services to LMI families; 8) Interfaith Volunteer Caregivers will assist seniors with indoor and outdoor chores; and 9) Macomb Community Action will provide seniors with grass cutting and snow removal services. All of these activities will be funded through CDBG.

Expand Planning, Grant Management and Capacity

Description: The plan participants and members of the Macomb HOME Consortium recognize that implementing this plan is one of many efforts being undertaken to improve the quality of life of Macomb County residents, as such, activities that address multiple objectives and align with other local, regional, and state programming, plans, and policies is a priority.

1) ESG funds equal to 7.5% for grant administration; 2) HOME funds equal to 25% for grant administration (allowed by HUD waiver dated April 10, 2020 submitted by the County on April 22, 2020); and 3) CDBG funds equal to 20% of the grant have been dedicated to administration (includes County, Macomb Homeless Coalition, and the Fair Housing Center of Metropolitan Detroit).

3. Evaluation of past performance

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

Funding decisions are based on compliance with the objectives listed in the 2019-2023 Consolidated Plan.

Funding Application: The request for funding application requires the proposed activity to align with the objectives of the Consolidated Plan.

Application Review: Applications are reviewed for completeness, fundability (compliance with a national objective), project feasibility, and capacity. Capacity, which takes into consideration past performance, is a major factor in the decision to fund a project.

Outcome Measurements: Subrecipient contracts and interdepartmental memorandums of understanding include agreed upon outcomes and performance indicators expected to be accomplished during the contract period. Failure to produce the expected outcomes, may jeopardize current funding and will be taken into consideration when evaluating future funding requests.

Performance Reports: Community Development Block Grant (CDBG) public service and Emergency Solutions Grant (ESG) subrecipients are required to submit progress reports on a quarterly basis. Home Investment Partnership (HOME) CHDOs, HOME subrecipients, and CDBG communities are required to submit performance reports with each draw request. Reports are reviewed and feedback on performance is provided when appropriate. The performance reports are taken into consideration in subsequent years when evaluating capacity.

During the review of the County's 2019-2023 Consolidated Plan, the U.S. Department of Housing and Urban Development - Office of Fair Housing and Equal Opportunity noted that the County's Consolidated Plan did not focus enough funds to areas of low-income and minority concentration. Based on this feedback, the County agreed to allocate CDBG bricks and mortar funds on a competitive basis. The scoring criteria for the competition would award higher points to projects that served areas of minority concentration. For the 2020 program year, nine (9) of the Urban County's twenty-one (21) communities submitted projects through the competition. Six (6) projects were awarded funding, three (3) of which are located in the County's lowest-income and highest minority concentration areas (Mount Clemens, Center Line, and Eastpointe). Of the \$849,234 made available through the competition, \$449,500 or 52% was awarded to these projects.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Per the County's Citizen Participation Plan (CPP), the Annual Action Plan must be developed in consultation with citizens and stakeholders, and at least one public hearing will occur. MHC members are responsible for developing their CDBG Annual Action Plans. CDBG funds are allocated to each community, which develops its own program in conformance with law and regulation, and in conformance with the Consolidated Plan. Macomb County and the MHC member communities must develop uses for HOME funding as well.

Each local community in the Urban County will meet this requirement in the following manner:

- A general community meeting is held early in the planning cycle. Communities receive essential program information, and are encouraged to ask questions and discuss concerns at this time.
- Each community will conduct its own public hearing to solicit citizen views on activities, and to provide eligibility, funding and other information essential to inform participation. These hearings must comply with the County's Citizen Participation Plan.

A public hearing will occur, at the County level, once the Annual Plan has been prepared, but prior to its submission for review and Board of Commissioner adoption.

In addition to the above, the County must consult with the local Continuum of Care regarding the use of ESG funds.

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.

A summary of the comments received are provided as an attachment in in Section AD-26 "Citizen Participation Comments".

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

All comments were taken into consideration during the development of this plan.

7. Summary

The County's CPP describes the policies and procedures for involving citizens in the planning of the use of CDBG, HOME, and ESG funds. A copy of the CPP and summary of public comments is attached to this plan.

In an effort to broaden public participation beyond the requirements provided in the CPP, the following outreach efforts were made:

- 1) The Annual Action Plan (AAP) was sent to all homeless shelters located in Macomb County via email with a request to have the plan posted in areas that were accessible to their clients;
- 2) The AAP was sent to all Public Housing Authorities located in Macomb County via United States Postal Service with a request to have the plan posted in areas that were accessible to PHA clients;
- 3) Notice of the availability of the AAP was sent via email to all 21 communities that participate in the Urban County CDBG program as well as all of the service providers that applied for CDBG funding for the 2020 program year;
- 4) Notice of the AAP public hearing was sent to the Fair Housing Center of Metropolitan Detroit; and
- 5) The 2020 AAP was posted on the County's website for the required thirty (30) day 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	MACOMB COUNTY	Macomb Community Action - Community Development	
HOME Administrator	MACOMB COUNTY	Macomb Community Action - Community Development	
ESG Administrator	MACOMB COUNTY	Macomb Community Action - Community Development	

Table 1 – Responsible Agencies

Narrative

Macomb County (County) is an Urban County which is comprised of 21 local units of government including the Villages of Armada, New Haven, and Romeo; the Townships of Armada, Bruce, Chesterfield, Harrison, Lenox, Macomb, Ray, Richmond, Shelby and Washington; and the Cities of Center Line, Eastpointe, Fraser, Memphis, Mount Clemens, New Baltimore, Richmond and Utica. Inaugurated in 1982 in the Community Development Block Grant (CDBG) program, the County became a HOME participating jurisdiction (PJ) in 1992, and formed the Macomb HOME Consortium (MHC) in 2006, together with Roseville, Sterling Heights, and Clinton Township. During the 2013 program year, the County received its first allocation of funds through the Emergency Solutions Grant (ESG). The Office of the County Executive designated Macomb Community Action, Office of Community Development as the entity responsible for administering its CDBG, HOME, and ESG programs including development of the Con Plan, AAP, and CAPER.

The members of the MHC have well-established and successful housing and community development histories. Each municipality is chartered under State and local law to receive and administer grant funds. Each has worked in concert with other municipalities and with non-housing municipal partners to extend program efficiency, scope, and reach. Partnerships extend to housing developers, public housing commissions, service providers, homeless advocates, and profit and non-profit organizations. Any actions undertaken occur by staff, acting at the directive of their legislative bodies and executive officers.

Consolidated Plan Public Contact Information

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

1. Introduction

Macomb County, as Lead Agency of the Macomb HOME Consortium (MHC), consulted with other government, non-profit, low-income persons, and private agencies to develop the PY 2019-2023 Consolidated Plan. Consultation included public hearings, focus groups, MHC team meetings, surveys, and direct solicitation/outreach, internet research, and a presentation to the Macomb County Board of Commissioners.

For the 2020 Annual Action Plan, Macomb County consulted with other government, non-profit, low-income persons, and private agencies to develop the PY 2020 AAP. However, consultation was affected by the COVID-19 pandemic resulting in most consultation efforts being held virtually, via email, and internet posting.

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)).

Macomb County advertised and held three focus groups during the outreach process for the PY 2019-2023 Consolidated Plan. The focus groups specifically addressed housing needs, public services and public facilities and infrastructure needs. Public and assisted housing providers, health agencies, mental health agencies, local governments, service organizations and the public were invited to attend. Invitations were sent via email, direct mailing, published in the local newspaper, posted on social media, and followed up with direct phone calls. While the focus groups were well attended, there was a lack of participation by the public housing providers. To encourage their participation, the County sent a survey via email and direct mailing to all six public housing authorities that are located in the jurisdiction of the MHC. The questions contained in the survey were specific to the public housing sections of the Consolidated Plan. The answers provided to the survey questions were used to respond to corresponding sections of this Plan.

MHC members coordinate with public and private developers and assisted housing providers when they request letters of support for specific projects or Certificates of Consistency with the Con Plan for HUD funding applications. Members may also share information and support public and assisted housing provider projects but due to limited resources it is not possible to address specific public housing needs with CDBG, HOME and ESG resources.

MHC members also participate in the local Continuum of Care (CoC). The CoC works to end homelessness and increase affordable housing opportunities.

Many of the activities funded by the County are carried out by other units of local government, developers, and sub-recipient organizations. These partners bring expertise and perspectives that play a crucial role in helping to identify priority needs and strategies that are incorporated into the Consolidated Plan.

For the 2020 Annual Action Plan two workshops were held, one for public service providers and another for community partners. Due to the COVID-19 pandemic public hearings were held virtually. To encourage participation, since most employees were working from home, email notifications were sent to partners, including housing provider's health, and services agencies in addition to the required newspaper notification.

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.

Services for the homeless and those at risk of homelessness (particularly victims of domestic violence, chronically homeless, families with children, veterans, and unaccompanied youth) were identified as a priority need during the focus groups workshops. The delivery system for these services is strong but is challenged by financial constraints and a great need. The County will continue to work with the local Continuum of Care during the life of the 2019-2023 Consolidated Plan to identify gaps in services that could benefit from CDBG and ESG funding.

The CoC is comprised of private and governmental health, mental health, local government leaders, service agencies, housing service providers, business and civic leaders, correction programs (Michigan Prisoner Re-Entry Program), social and fair housing service providers, and educators. The CoC meets several times throughout the year. The Macomb HOME Consortium has regularly sent representation to these meetings. Constant contact occurs during shared projects and initiatives such as Coordinated Entry.

As reported in the last plan, the system is hindered by varying funding restrictions which impede cooperation among partners. Each funding source has its own mandates, making it difficult to achieve the inter-organizational alignment necessary to address shared issues. Another constraint boils down to having insufficient money to address all needs. This forces hard choices between high priority needs and objectives, often diminishing opportunities for cooperation.

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.

Macomb County receives ESG funds and works with the Macomb County Homeless Coalition, the CoC provider for Macomb County, to direct funding to address the greatest need. The Macomb County Homeless Coalition participated in the development of this plan and the identification of priorities. Overall, there are several emergency shelters in the county, including the Macomb County Emergency Shelter Team (MCREST), Turning Point, Salvation Army MATTS, and the Macomb County Warming Center. Maintaining these types of programs was identified as a priority by plan stakeholders, including the CoC and this plan supports continuing these services as an ongoing priority.

Macomb County consults each year with the local Continuum of Care (CoC) to determine how to allocate the County's ESG funds. Program staff also consults with the CoC when developing the performance standards. For evaluating the outcomes of projects and activities assisted by ESG funds, the County complies with the guidelines established by the CoC's Compliance Committee. As the CoC's lead for HMIS, the Macomb Homeless Coalition establishes policies and procedures for the administration and operation of the HMIS.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	STERLING HEIGHTS
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	As a member of the Macomb HOME Consortium, the City of Sterling Heights participates in the selection of activities for HOME funding. The City was also involved in selecting the Goals and the Priority Needs for the Consolidated Plan.
2	Agency/Group/Organization	ROSEVILLE
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	As a member of the Macomb HOME Consortium, the City of Roseville participates in the selection of activities for HOME funding. The City was also involved in selecting the Goals and the Priority Needs for the Consolidated Plan.
3	Agency/Group/Organization	CLINTON TOWNSHIP (MACOMB COUNTY)
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	As a member of the Macomb HOME Consortium, Clinton Township participates in the selection of activities for HOME funding. The Township was also involved in selecting the Goals and the Priority Needs for the Consolidated Plan.
4	Agency/Group/Organization	Macomb Homeless Coalition
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	As the lead agency for the CoC, the Macomb Homeless Coalition was consulted to determine the best use of the County's ESG allocation. CoC input is needed in order to determine the most beneficial way to allocate the County's ESG funds.
5	Agency/Group/Organization	Armada Township
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Local Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Formal and informal consultation occurred with this community during Plan development. This included community and non-profit workshops, public hearings, and informal, ad-hoc discussions. Valuable insights were obtained and incorporated into this Plan.
6	Agency/Group/Organization	Village of Armada
	Agency/Group/Organization Type	Other government - Local

	What section of the Plan was addressed by Consultation?	Local Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Formal and informal consultation occurred with this community during Plan development. This included community and non-profit workshops, public hearings, and informal, ad-hoc discussions. Valuable insights were obtained and incorporated into this Plan.
7	Agency/Group/Organization	Bruce Township
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Local Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Formal and informal consultation occurred with this community during Plan development. This included community and non-profit workshops, public hearings, and informal, ad-hoc discussions. Valuable insights were obtained and incorporated into this Plan.
8	Agency/Group/Organization	CENTER LINE
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Local Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Formal and informal consultation occurred with this community during Plan development. This included community and non-profit workshops, public hearings, and informal, ad-hoc discussions. Valuable insights were obtained and incorporated into this Plan.
9	Agency/Group/Organization	CHESTERFIELD TOWNSHIP
	Agency/Group/Organization Type	Other government - Local

	What section of the Plan was addressed by Consultation?	Local Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Formal and informal consultation occurred with this community during Plan development. This included community and non-profit workshops, public hearings, and informal, ad-hoc discussions. Valuable insights were obtained and incorporated into this Plan.
10	Agency/Group/Organization	CITY OF EASTPOINTE
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Local Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Formal and informal consultation occurred with this community during Plan development. This included community and non-profit workshops, public hearings, and informal, ad-hoc discussions. Valuable insights were obtained and incorporated into this Plan.
11	Agency/Group/Organization	CITY OF FRASER
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Local Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Formal and informal consultation occurred with this community during Plan development. This included community and non-profit workshops, public hearings, and informal, ad-hoc discussions. Valuable insights were obtained and incorporated into this Plan.
12	Agency/Group/Organization	HARRISON TOWNSHIP
	Agency/Group/Organization Type	Other government - Local

	What section of the Plan was addressed by Consultation?	Local Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Formal and informal consultation occurred with this community during Plan development. This included community and non-profit workshops, public hearings, and informal, ad-hoc discussions. Valuable insights were obtained and incorporated into this Plan.
13	Agency/Group/Organization	LENOX TOWNSHIP
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Local Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Formal and informal consultation occurred with this community during Plan development. This included community and non-profit workshops, public hearings, and informal, ad-hoc discussions. Valuable insights were obtained and incorporated into this Plan.
14	Agency/Group/Organization	MACOMB TOWNSHIP
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Local Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Formal and informal consultation occurred with this community during Plan development. This included community and non-profit workshops, public hearings, and informal, ad-hoc discussions. Valuable insights were obtained and incorporated into this Plan.
15	Agency/Group/Organization	CITY OF MEMPHIS
	Agency/Group/Organization Type	Other government - Local

	What section of the Plan was addressed by Consultation?	Local Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Formal and informal consultation occurred with this community during Plan development. This included community and non-profit workshops, public hearings, and informal, ad-hoc discussions. Valuable insights were obtained and incorporated into this Plan.
16	Agency/Group/Organization	CITY OF MOUNT CLEMENS
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Local Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Formal and informal consultation occurred with this community during Plan development. This included community and non-profit workshops, public hearings, and informal, ad-hoc discussions. Valuable insights were obtained and incorporated into this Plan.
17	Agency/Group/Organization	CITY OF NEW BALTIMORE
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Local Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Formal and informal consultation occurred with this community during Plan development. This included community and non-profit workshops, public hearings, and informal, ad-hoc discussions. Valuable insights were obtained and incorporated into this Plan.
18	Agency/Group/Organization	VILLAGE OF NEW HAVEN
	Agency/Group/Organization Type	Other government - Local

	What section of the Plan was addressed by Consultation?	Local Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Formal and informal consultation occurred with this community during Plan development. This included community and non-profit workshops, public hearings, and informal, ad-hoc discussions. Valuable insights were obtained and incorporated into this Plan.
19	Agency/Group/Organization	RAY TOWNSHIP
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Local Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Formal and informal consultation occurred with this community during Plan development. This included community and non-profit workshops, public hearings, and informal, ad-hoc discussions. Valuable insights were obtained and incorporated into this Plan.
20	Agency/Group/Organization	CITY OF RICHMOND
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Local Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Formal and informal consultation occurred with this community during Plan development. This included community and non-profit workshops, public hearings, and informal, ad-hoc discussions. Valuable insights were obtained and incorporated into this Plan.
21	Agency/Group/Organization	RICHMOND TOWNSHIP
	Agency/Group/Organization Type	Other government - Local

	What section of the Plan was addressed by Consultation?	Local Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Formal and informal consultation occurred with this community during Plan development. This included community and non-profit workshops, public hearings, and informal, ad-hoc discussions. Valuable insights were obtained and incorporated into this Plan.
22	Agency/Group/Organization	VILLAGE OF ROMEO
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Local Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Formal and informal consultation occurred with this community during Plan development. This included community and non-profit workshops, public hearings, and informal, ad-hoc discussions. Valuable insights were obtained and incorporated into this Plan.
23	Agency/Group/Organization	Shelby Township
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Local Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Formal and informal consultation occurred with this community during Plan development. This included community and non-profit workshops, public hearings, and informal, ad-hoc discussions. Valuable insights were obtained and incorporated into this Plan.
24	Agency/Group/Organization	CITY OF UTICA
	Agency/Group/Organization Type	Other government - Local

	What section of the Plan was addressed by Consultation?	Local Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Formal and informal consultation occurred with this community during Plan development. This included community and non-profit workshops, public hearings, and informal, ad-hoc discussions. Valuable insights were obtained and incorporated into this Plan.
25	Agency/Group/Organization	Washington Township
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Local Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Formal and informal consultation occurred with this community during Plan development. This included community and non-profit workshops, public hearings, and informal, ad-hoc discussions. Valuable insights were obtained and incorporated into this Plan.
26	Agency/Group/Organization	Macomb Community Action
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Other government - Local
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The needs identified in Macomb Community Action's Community Needs Assessment were considered when developing this plan to ensure that services were necessary and not duplicated.
27	Agency/Group/Organization	Macomb County Warming Center
	Agency/Group/Organization Type	Services-homeless

	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in the non-profit workshop during which public service needs were discussed. The needs of public service providers were relayed to participating units of general local government. The local government took into consideration those comments when allocating funding.
28	Agency/Group/Organization	Turning Point
	Agency/Group/Organization Type	Services-Victims of Domestic Violence Services - Victims
	What section of the Plan was addressed by Consultation?	Public Services
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in the non-profit workshop during which public service needs were discussed. The needs of public service providers were relayed to participating units of general local government. The local government took into consideration those comments when allocating funding.
29	Agency/Group/Organization	Interfaith Volunteer Care givers
	Agency/Group/Organization Type	Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Public Services
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in the non-profit workshop during which public service needs were discussed. The needs of public service providers were relayed to participating units of general local government. The local government took into consideration those comments when allocating funding.

30	Agency/Group/Organization	MCREST
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy Public Services
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in the non-profit workshop during which public service needs were discussed. The needs of public service providers were relayed to participating units of general local government. The local government took into consideration those comments when allocating funding.
31	Agency/Group/Organization	ST VINCENT DE PAUL
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Public Services
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in the non-profit workshop during which public service needs were discussed. The needs of public service providers were relayed to participating units of general local government. The local government took into consideration those comments when allocating funding.
32	Agency/Group/Organization	Washington Township Historical Society
	Agency/Group/Organization Type	Historic Preservation
	What section of the Plan was addressed by Consultation?	Historic Preservation

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in the non-profit workshop during which public service needs were discussed. The needs of public service providers were relayed to participating units of general local government. The local government took into consideration those comments when allocating funding.
33	Agency/Group/Organization	SAMARITAN HOUSE
	Agency/Group/Organization Type	Services - Food Assistance
	What section of the Plan was addressed by Consultation?	Public Services
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in the non-profit workshop during which public service needs were discussed. The needs of public service providers were relayed to participating units of general local government. The local government took into consideration those comments when allocating funding.
34	Agency/Group/Organization	Care House
	Agency/Group/Organization Type	Services-Children Services - Victims
	What section of the Plan was addressed by Consultation?	Public Services
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in the non-profit workshop during which public service needs were discussed. The needs of public service providers were relayed to participating units of general local government. The local government took into consideration those comments when allocating funding.
35	Agency/Group/Organization	Helping Hands Gifts
	Agency/Group/Organization Type	Services - Food Assistance
	What section of the Plan was addressed by Consultation?	Public Services

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in the non-profit workshop during which public service needs were discussed. The needs of public service providers were relayed to participating units of general local government. The local government took into consideration those comments when allocating funding.
36	Agency/Group/Organization	SHELBY LIONS CLUB
	Agency/Group/Organization Type	Services - Food Assistance
	What section of the Plan was addressed by Consultation?	Public Services
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in the non-profit workshop during which public service needs were discussed. The needs of public service providers were relayed to participating units of general local government. The local government took into consideration those comments when allocating funding.
37	Agency/Group/Organization	New Generation Ministries
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Public Services
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in the non-profit workshop during which public service needs were discussed. The needs of public service providers were relayed to participating units of general local government. The local government took into consideration those comments when allocating funding.
38	Agency/Group/Organization	Macomb County Habitat for Humanity
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Macomb County Habitat for Humanity conducts a home buyer program for low-income buyers. Formal and informal consultation occurred with this agency during Plan development. Valuable insights were obtained and incorporated into this Plan.
39	Agency/Group/Organization	Community Housing Network, Inc.
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Community Housing Network provides a variety of housing programs to Macomb County residents, including home buyer, rental, and homeless assistance programs. Formal and informal consultation occurred with this agency during Plan development. Valuable insights were obtained and incorporated into this Plan.
40	Agency/Group/Organization	Macomb County Health Department
	Agency/Group/Organization Type	Health Agency Other government - County
	What section of the Plan was addressed by Consultation?	COVID 19 Related Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Macomb County Health Department was consulted for the purpose of identifying needs related to the COVID-19 pandemic.

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

As described in AP-05, extensive outreach efforts were made to involve a variety of agency types in the development of this plan.

Macomb County reached out to many more agencies and organizations, including Public Housing Agencies, but only organizations that actively participated in the development of Macomb County's 2020 Annual Action Plan or submitted comments were included in the preceding table.

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	Macomb Homeless Coalition	The goals and strategies of the CoC's plan to end homelessness overlap and align with the goals and priority needs of the Consolidated Plan.
Macomb Community Action Community Needs Assessment	Macomb Community Action	The Goals identified in the plan overlap and align with the goals and priority needs of the Consolidated Plan.
Macomb County Community Health Improvement Plan	Macomb County Health Department	Goals identified in the plan overlap and align with the goals and priority needs of the Consolidated Plan.

Table 3 – Other local / regional / federal planning efforts

Narrative

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.

Each year the County must prepare an Annual Action Plan (AAP) outlining strategies, actions, and activities to be undertaken during the coming year for its CDBG, HOME, and ESG funds. The AAP must be developed in consultation with citizens and stakeholders. Per the County's Citizen Participation Plan at least one public hearing will occur during the AAP planning process.

There are 21 local communities which participate in the Urban County CDBG program. Each of these communities were required to conduct its own public hearing to solicit citizen views on activities, and to provide eligibility, funding and other information essential to inform participation.

Another public hearing was held at the County level prior to submission for review and approval by the County Board of Commissioners.

A summary of the process and how it impacted goal setting is provided in the "Citizen Participation Outreach".

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	Newspaper Ad	Non-targeted/broad community	Notice of the Village of Armada's public hearing was published in the Record Newspaper on December 18, 2019.	No comments were received.	N/A	
2	Public Hearing	Non-targeted/broad community	January 13, 2020 Village of Armada public hearing. The meeting was held by the governing body and was open to the public.	Representatives from Armada PAL, Samaritan House, and Care House explained the benefits of their respective programs.	The organizations that presented at the public hearing were allocated funding.	
3	Public Meeting	Non-targeted/broad community	Notice of Armada Township's public hearing was published in the Record Newspaper on January 22, 2020.	No comments were received.	N/A	

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)
4	Public Hearing	Non-targeted/broad community	February 12, 2020 Armada Township's public hearing. The meeting was held by the governing body and was open to the public.	Representatives from Armada PAL, Samaritan House, and Care House all spoke about the benefits of their respective programs.	The organizations that presented at the public hearing were allocated funding.	
5	Newspaper Ad	Non-targeted/broad community	Notice of Bruce Township's public hearing was published in the Record Newspaper on December 29, 2019.	No comments were received.	N/A	
6	Public Hearing	Non-targeted/broad community	January 15, 2020 Bruce Township's public hearing. The meeting was held by the governing body and was open to the public.	Representative from Care House, Interfaith Volunteer Caregivers, and Samaritan House spoke about the benefits of their respective programs.	The organizations that presented at the public hearing were allocated funding.	
7	Newspaper Ad	Non-targeted/broad community	Notice of the City of Center Line's public hearing was published in the Warren Weekly on January 15, 2020.	No comments were received.	N/A	

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)
8	Public Meeting	Non-targeted/broad community	February 3, 2020 Center Line's public hearing. The meeting was held by the governing body and was open to the public.	No comments were received.	N/A	
9	Newspaper Ad	Non-targeted/broad community	Notice of Chesterfield Township's public hearing was published in the Macomb Daily on December 21, 2019.	No comments were received.	N/A	
10	Public Hearing	Non-targeted/broad community	January 14, 2020 Chesterfield Township's public hearing. The meeting was held by the governing body and was open to the public.	No comments were received.	N/A	
11	Newspaper Ad	Non-targeted/broad community	Notice of the City of Eastpointe's public hearing was published in the Macomb Daily on January 11, 2020.	No comments were received.	N/A	

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)
12	Public Hearing	Non-targeted/broad community	February 4, 2020 the City of Eastpointe's public hearing. The meeting was held by the governing body and was open to the public.	Representatives from Turning Point, Interfaith Volunteer Caregivers, Wig 4 Kids, and Care House spoke about the benefits of their programs.	The organizations that presented at the public hearing were allocated funding.	
13	Newspaper Ad	Non-targeted/broad community	Notice of the City of Fraser's public hearing was published in the Fraser-Clinton Chronicle on December 18, 2019.	No comments were received.	N/A	
14	Public Hearing	Non-targeted/broad community	January 9, 2020 the City of Fraser's public hearing. The meeting was held by the governing body and was open to the public.	Representatives from Turning Point and Care House spoke about the benefits of their programs.	The organizations that presented at the public hearing were allocated funding.	
15	Newspaper Ad	Non-targeted/broad community	Notice of Harrison Township's public hearing was published in the Mount Clemens-Clinton-Harrison Journal on January 8, 2020.	No comments were received.	N/A	

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)
16	Public Hearing	Non-targeted/broad community	January 27, 2020 Harrison Township's public hearing. The meeting was held by the governing body and was open to the public.	No comments were received.	N/A	
17	Public Meeting	Non-targeted/broad community	Notice of Lenox Township's public hearing was published in the Macomb Daily on December 11, 2019.	No comments were received.	N/A	
18	Public Hearing	Non-targeted/broad community	January 6, 2020 Lenox Township's public hearing. The meeting was held by the governing body and was open to the public.	Representatives from Turning Point and Care House spoke about the benefits of their programs.	The organizations that presented at the public hearing were allocated funding.	
19	Newspaper Ad	Non-targeted/broad community	Notice of Macomb Township's public hearing was published in the Macomb Chronicle on January 23, 2020.	No comments were received.	N/A	

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)
20	Public Hearing	Non-targeted/broad community	February 12, 2020 Macomb Township's public hearing. The meeting was held by the governing body and was open to the public.	No comments were received.	N/A	
21	Newspaper Ad	Non-targeted/broad community	Notice of the City of Memphis' public hearing was published in the Voice Newspaper on January 29, 2020.	No comments were received.	N/A	
22	Public Hearing	Non-targeted/broad community	February 4, 2020 the City of Memphis' public hearing. The meeting was held by the governing body and was open to the public.	A representative from Care House spoke about the benefits of its programs.	The organization was allocated funding.	
23	Newspaper Ad	Non-targeted/broad community	Notice of the City of Mount Clemens' public hearing was published in the Journal Newspaper on December 25, 2019.	No comments were received.	N/A	

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)
24	Public Hearing	Non-targeted/broad community	January 21, 2020 the City of Mount Clemens' public hearing. The meeting was held by the governing body and was open to the public.	Representatives from Turning Point, Care House, and Interfaith Volunteer Caregivers all spoke about the benefits of their respective programs.	The organizations that presented at the public hearing were allocated funding.	
26	Public Hearing	Non-targeted/broad community	February 24, 2020 the City of New Baltimore' public hearing. The meeting was held by the governing body and was open to the public.	No comments were received.	N/A	
27	Newspaper Ad	Non-targeted/broad community	Notice of the Village of New Haven's public hearing was published in The Voice Newspaper on December 25, 2019.	No comments were received.	N/A	

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)
28	Public Hearing	Non-targeted/broad community	January 14, 2020 the Village of New Haven's public hearing. The meeting was held by the governing body and was open to the public.	Representative from Turning Point and Care House spoke about the benefits of their respective programs. Five residents spoke about the need of sidewalk improvements in the community.	The Village allocated funding to both Turning Point and Care House. The Village also submitted an application to the County requesting CDBG funding for sidewalk improvements.	
29	Newspaper Ad	Non-targeted/broad community	Notice of Ray Township's public hearing was published in The Record Newspaper on January 1, 2020.	No comments were received.	N/A	
30	Public Hearing	Non-targeted/broad community	January 21, 2020 Ray Township's public hearing. The meeting was held by the governing body and was open to the public.	Representatives from Interfaith Volunteer Caregivers, Care House, and Ray Township's Senior Center all spoke about the benefits of their respective programs.	The organizations that presented at the public hearing were allocated funding.	

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)
31	Newspaper Ad	Non-targeted/broad community	Notice of Richmond Township's public hearing was published in The Voice Newspaper on January 22, 2020.	No comments were received.	N/A	
33	Public Meeting	Non-targeted/broad community	Notice of the City of Richmond's public hearing was published in The North Macomb Star on January 1, 2020.	No comments were received.	N/A	
34	Public Hearing	Non-targeted/broad community	January 20, 2020 City of Richmond's public hearing. The meeting was held by the governing body and was open to the public.	No comments were received.	N/A	
35	Newspaper Ad	Non-targeted/broad community	Notice of the Village of Romeo's public hearing was published in the Macomb Daily on January 1, 2020.	No comments were received.	N/A	

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)
36	Public Hearing	Non-targeted/broad community	January 1, 2020 Village of Romeo's public hearing. The meeting was held by the governing body and was open to the public.	Representatives from Interfaith Volunteer Caregivers, Turning Point, Samaritan and Care House spoke about the benefits of their respective programs.	The organizations that presented at the public hearing were allocated funding.	
37	Public Meeting	Non-targeted/broad community	Notice of Shelby Township's public hearing was published in the Macomb Daily on February 1, 2020.	No comments were received.	N/A	
38	Public Meeting	Non-targeted/broad community	February 18, 2020 Shelby Township's public hearing. The meeting was held by the governing body and was open to the public.	No comments were received.	N/A	
39	Public Meeting	Non-targeted/broad community	Notice of the City of Utica's public hearing was published in the Shelby-Utica New on December 25, 2019.	No comments were received.	N/A	

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)
40	Public Meeting	Non-targeted/broad community	January 14, 2020 City of Utica's public hearing. The meeting was held by the governing body and was open to the public.	Representatives from the Macomb County Warming Center, Turning Point and Care House spoke about the benefits of their respective programs.	The organizations that presented at the public hearing were allocated funding.	
41	Newspaper Ad	Non-targeted/broad community	Notice of Washington Township's public hearing was published in the Macomb Daily on December 29, 2019.	No comments were received.	N/A	
43	Newspaper Ad	Non-targeted/broad community	Notice of public service workshop was published in the Macomb Daily on August 16, 2019.	No comments were received.	N/A	

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)
45	Public Meeting	Non-targeted/broad community	Community workshop was held on November 7, 2019 at the Macomb County Family Resource Center. This site was selected as the location houses many service providers that assist low-income persons. Twenty-seven (27) representatives from communities that participate in the Urban County CDBG program were in attendance.	Some comments were received regarding the County's competitive process for awarding CDBG funds to bricks and mortar projects.	Macomb County staff advised the attendees that the competitive process was the result of consultation with Office of Fair Housing and Equal Opportunity during the approval process for the 2019-2023 Consolidated Plan.	
46	Newspaper Ad	Non-targeted/broad community	Notice of Macomb County's public hearing for the 2020 Annual Action Plan published in the Macomb Daily on May 5, 2020.	No comments were received.	N/A	

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)
47	Public Hearing	Non-targeted/broad community	<p>May 20, 2020 Macomb County's 2020 Annual Action Plan public hearing. Due to the COVID-19 pandemic the public hearing was held virtually. There were two attendees, a representative from Community Housing Network and a representative from the Fair Housing Center of Metropolitan Detroit.</p>	<p>Community Housing Network's written comments are included as an attachment to AD-26. A representative from Care House who was unable to participate in the hearing submitted comments which are also included as an attachment to AD-26.</p>	<p>Community Housing Network advocated for HOME funds to be used for housing production rather than TBRA. Macomb County decided to fund TBRA due to need for rental assistance due to COVID-19. Also, the County has a considerable amount of prior year HOME funds dedicated for new housing production. Care House's comments related to the need for funding victims of child abuse. The comments were taken into consideration and Care House's request for funding was granted.</p>	

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)
48	Newspaper Ad	Non-targeted/broad community	Notice of the 30-day public comment period for the 2020 Annual Action Plan was published in the Macomb Daily on May 24, 2020.	No comments were received.	N/A	
49	Email Notification	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	In an effort to encourage participation, notice of the availability of the 2020 Annual Action Plan 30-day public comment period was sent via email to an extensive list of housing services providers, public housing agencies, community partners, organizations that represent minority populations and non-English speaking person, etc.	No comments were received.	N/A	
50	Public Meeting	Non-targeted/broad community	June 25, 2020 Macomb County Board of Commissioner's meeting.	No comments were received.	N/A	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

Macomb County will primarily use the CDBG, HOME, and ESG program funds included in the following table to accomplish specific objectives identified in the 2019-2023 5-Year Consolidated Plan. The 2020 program year is the second in the current 5 Year Consolidated Plan.

Pre-Award Costs: As allowed under the Uniform Grant Guidance at 2 CFR 200.458, the Community Development Block Grant regulations at 24 CFR 570.200(h), and the HOME Investment Partnership Program regulations at 24 CFR 92.212, the County may incur costs prior to the effective date of its grant agreement. Pre-award cost are those incurred prior to the effective date of the Federal award directly pursuant to the negotiation and in anticipation of the Federal award where such costs are necessary for efficient and timely performance of the scope of work. Such costs are allowable only to the extent that they would have been allowable if incurred after the date of the Federal award and only with written approval of the Federal awarding agency. The pre-award costs will not impact future grants.

Additional Funding Note: The funding provided in the following table under CDBG "Prior Year Resources" includes program income accumulated through the Neighborhood Stabilization Program (NSP). Macomb County has not yet requested to have those funds transferred to the County's CDBG program. The request to transfer the funds will be submitted to HUD when the County is confident that it will meet the expenditure timeliness requirement. Once the NSP program income is transferred, those funds will be directed to housing rehabilitation programs.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,887,306	40,000	315,360	2,242,666	5,661,918	These funds will leverage other public investments through community funds for infrastructure investments.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,729,122	110,077	0	1,839,199	5,187,366	These funds will be distributed throughout the jurisdiction of the Macomb HOME Consortium to support housing needs of low- to moderate-income residents.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	157,031	0	0	157,031	471,093	These funds will be used to support transitional housing and other eligible needs.

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.

Community Development Block Grant funds will leverage additional resources as follows:

- Public Infrastructure & public facility projects will be supported with other funds from participating jurisdictions
- Rehabilitation funds will leverage Weatherization and other sources to expand the scope of rehabilitation assistance

HOME Investment Partnership Funds will leverage additional public and private investment:

- Homeownership investment will leverage funds from other agencies such as the Michigan State Housing Development Authority and other funds
- Rental projects supported by HUD will leverage additional funding from Federal Home Loan Bank programs, the application of Low Income Housing Tax Credits and corresponding private equity investment, private construction and acquisition financing; and other sources

HOME match requirements are achieved via in-kind support of numerous agencies, the donation of labor and materials on numerous homebuyer projects, and the application of payments in lieu of taxes for affordable housing developments in numerous communities. NOTE: On April 22, 2020 Macomb County, on behalf of the Macomb HOME Consortium, submitted a waiver request to the Detroit HUD Field Office pertaining to HUD memorandum dated April 10, 2020- Availability of Waivers and Suspensions of the HOME Program Requirements in Response to the COVID-19 Pandemic. The County's waiver request included a reduction to the HOME matching requirement by 100% for the FY 2020 and FY 2021 program years as allowed by the HUD memorandum.

Emergency Solutions Grants will leverage additional investment as follows:

Additional funding resources will be leveraged through the 100% match requirement. Sources of match includes cash, HUD CoC grants, CDBG, private grants, and CSBG.

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

Publically owned land included in the plan includes senior centers and parks. Other options may include public land donated or sold at a reduced cost for development of affordable housing.

Discussion

The overall level of Federal entitlement funding has remained steady or declined slightly over the last decade. However, the cost of administering and implementing projects continues to increase. Therefore, the number of persons benefiting from the programs has decreased.

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	Make Available Appropriate Housing	2019	2023	Affordable Housing Public Housing Homeless	LMI Housing Activities	Housing Rehabilitation Rental Housing Affordable Housing Units	CDBG: \$612,852 HOME: \$1,406,919	Homeowner Housing Added: 1 Household Homeowner Housing Rehabilitated: 83 Household Tenant-based rental assistance / Rapid Rehousing: 60 Households Assisted
2	Improve Public Facilities and Infrastructure	2019	2023	Non-Housing Community Development	Low/Mod Area Limited Clientele Activity	Public Facilities Public Improvements	CDBG: \$899,235	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 36265 Persons Assisted
3	Address the Needs of Homeless & At-Risk Families	2019	2023	Homeless	Limited Clientele Activity ESG Activities	Rental Housing Emergency Shelters and Transitional Housing Public Services	CDBG: \$107,088 ESG: \$145,250	Tenant-based rental assistance / Rapid Rehousing: 36 Households Assisted Homeless Person Overnight Shelter: 989 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Provide and Expand Human Services	2019	2023	Homeless Non-Homeless Special Needs Non-Housing Community Development Low- to Moderate-Income Households	Limited Clientele Activity	Public Services Food Bank Services	CDBG: \$353,118	Public service activities other than Low/Moderate Income Housing Benefit: 16447 Persons Assisted
5	Expand Planning, Grant Management and Capacity	2019	2023	Program Administration and Planning/Fair Housing	Grant Administration	Local and Regional Planning	CDBG: \$377,461 HOME: \$432,280 ESG: \$11,777	Other: 1 Other

Table 3 – Goals Summary

Goal Descriptions

1	Goal Name	Make Available Appropriate Housing
	Goal Description	2020 projects under this goal include: CHDO Operating, various Housing Rehabilitation Programs (HOME & CDBG), CHDO Set-Aside for new construction of affordable housing, HOME funded Tenant Based Rental Assistance (TBRA), and CDBG funds will also be used for housing rehabilitation delivery costs.

2	Goal Name	Improve Public Facilities and Infrastructure
	Goal Description	<p>The following public facilities and infrastructure improvement activities will be executed utilizing CDBG funds during the 2020 program year:</p> <p>City of Center Line: Splash Pad</p> <p>Chesterfield Township: Senior Citizen Playground</p> <p>City of Eastpointe: Roxana Street Reconstruction</p> <p>City of Mount Clemens: Jones Street Utility Replacement</p> <p>Village of New Haven: Sidewalk Installation Project</p> <p>Shelby Township: Dequindre Road Sidewalks</p>
3	Goal Name	Address the Needs of Homeless & At-Risk Families
	Goal Description	<p>2020 projects under this goal include:</p> <p>ESG activities including HMIS, Rapid Re-Housing, Homelessness Prevention, and Shelter Operations.</p> <p>CDBG public services include MCREST, Macomb County Warming Center and Turning Point.</p> <p>NOTE: HUD memorandum dated April 9, 2020, subject: "CARES Act Flexibilities for CDBG Funds Used to Support Coronavirus Response and Plan Amendment Waiver", states that the 15 percent cap on the amount of grant funds that can be used for public service activities was not applicable for the FY 2019 and 2020 CDBG grant funds used for coronavirus efforts. Macomb County allocated additional CDBG public service funds to MCREST, Turning Point, Macomb County Warming Center, Care House, and Samaritan House. The need for these type of services greatly increased as result of the COVID-19 pandemic (housing for the homeless, victims of domestic violence and child abuse, and food assistance).</p>

4	Goal Name	Provide and Expand Human Services
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<p>Goal Description</p>	<p>2020 projects under this goal include CDBG funded public services including:</p> <p>Macomb County Senior Chore Program: grass cutting and snow removal services to eligible residents from all 21 communities that participate in the Urban County CDBG program.</p> <p>Senior Center Programming and/or Staffing: Chesterfield Township, Lenox Township, Macomb Township, Ray Township, and City of Richmond.</p> <p>Senior Dial-A-Ride: Harrison Township</p> <p>Large Print Library Books: City of Utica and Shelby Township</p> <p>Armada PAL: Provide summer camp scholarships to low-income families. Available to residents of*: Armada Township and Armada Village</p> <p>Care House: Assistance to victims of child abuse. Services available to all 21 communities that participate in the Urban County CDBG Program.</p> <p>Interfaith Volunteer Caregivers: Provide assistance to senior citizens to complete household chores. Available to residents of*: Bruce Township, Center Line, Eastpointe, Mount Clemens, New Baltimore, Richmond City, Romeo, Shelby Township, Utica and Washington Township.</p> <p>New Generation Ministries: Provide youth summer day camp/trips to income eligible families. Available to residents of*: Mount Clemens</p> <p>Samaritan House: Provide food assistance to income eligible families. Available to residents of*: Armada Township, Armada Village, Bruce Township, Romeo, Shelby Township, and Washington Township.</p> <p>Shelby Township Lions: Provide holiday food assistance to income eligible families. Available to residents of*: Shelby Township</p> <p>Wigs 4 Kids: Provide wigs needed due to medical issues to children of income eligible families. Available to residents of*: Chesterfield Township, Eastpointe, New Baltimore, and Shelby Township.</p> <p>*If funds are not fully expended by the third quarter, remaining funding may be used to serve eligible residents from any of the 21 communities that participate in the Urban County CDBG program.</p> <p>NOTE: HUD memorandum dated April 9, 2020, subject: "CARES Act Flexibilities for CDBG Funds Used to Support Coronavirus Response and Plan Amendment Waiver", states that the 15 percent cap on the amount of grant funds that can be used for public</p>
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		service activities was not applicable for the FY 2019 and 2020 CDBG grant funds used for coronavirus efforts. Macomb County allocated additional CDBG public service funds to MCREST, Turning Point, Macomb County Warming Center, Care House, and Samaritan House. The need for these type of services greatly increased as result of the COVID-19 pandemic (housing for the homeless, victims of domestic violence and child abuse, and food assistance).
5	Goal Name	Expand Planning, Grant Management and Capacity
	Goal Description	2020 projects under this goal include: CDBG, HOME, and ESG program administration Fair Housing Activities through the Fair Housing Center of Metropolitan Detroit Macomb Homeless Coalition planning activities

AP-35 Projects - 91.420, 91.220(d)

Introduction

The following projects meet the needs of the 2019-2023 Macomb HOME Consortium Consolidated Plan.

#	Project Name
1	2020 ESG Activities
2	2020 HOME Administration
3	2020 HOME CHDO Operating
4	2020 HOME Housing Rehabilitation
5	2020 CHDO Set-Aside Project Funds
6	2020 HOME Tenant Based Rental Assistance
7	2020 CDBG Administration
8	2020 CDBG Housing Rehabilitation
9	2020 CDBG Public Service Activities
10	2020 CDBG Housing Rehabilitation Program Administration
11	2020 CDBG Public Facilities and Infrastructure

Table 4 – Project Information

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

ESG activities are developed in consultation with the Macomb County CoC.

HOME activities are developed in consultation with the members of the Macomb HOME Consortium based and community affordable housing providers/developers.

CDBG public facilities and infrastructure projects were selected on a competitive basis. Projects were scored prioritizing areas of minority concentration, community need, citizen participation, community LMI population, funds leveraged, and Opportunity Zone status. CDBG public service activities were selected by communities based on their individual needs.

AP-38 Project Summary

Project Summary Information

1	Project Name	2020 ESG Activities
	Target Area	ESG Activities
	Goals Supported	Address the Needs of Homeless & At-Risk Families
	Needs Addressed	Rental Housing Emergency Shelters and Transitional Housing
	Funding	ESG: \$157,031
	Description	The ESG 2020 annual Allocation for Macomb County will be allocated to program administration, HMIS, shelter operations, homelessness prevention, and rapid re-housing.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 36 households will be assisted through rapid rehousing (RRH) and homelessness prevention (HP) activities. Approximately 989 persons will be provided shelter in homeless shelters that received ESG shelter operations funding. Household income for families receiving RRH or HP ESG assistance may not exceed 30% of the area median income. In addition, the household must qualify under the correct category of homeless as applicable to RRH and HP.
	Location Description	As the only recipient of ESG funding in Macomb County, ESG funded activities serve all eligible Macomb County residents.
	Planned Activities	Program Administration - activity budget: \$11,777 HMIS - activity budget: \$5,000 Rapid Re-Housing - activity budget: \$50,000 Homelessness Prevention - activity budget: \$40,254 Shelter Operations - activity budget: \$50,000
2	Project Name	2020 HOME Administration
	Target Area	Grant Administration
	Goals Supported	Expand Planning, Grant Management and Capacity
	Needs Addressed	Rental Housing Housing Rehabilitation Affordable Housing Units
	Funding	HOME: \$432,280
	Description	Costs related to administration of the HOME program.

	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	N/A - Administration costs only
	Location Description	The jurisdiction of the Macomb HOME Consortium.
	Planned Activities	<p>Eligible administration expenses include but are not limited to: staff salaries and related costs; goods and services necessary for program administration; services under third party agreements; fair housing activities; preparation of the Consolidated Plan, Annual Action Plan and CAPER; and compliance with other federal requirements.</p> <p>NOTE: the budget for HOME administration is based upon the 25% allowed through the CARES Act waiver. The County's waiver request was submitted to the Detroit HUD Field Office on April 22, 2020. The CARES Act waiver increased the amount of HOME funds that could be used for eligible administration costs from 10% to 25%.</p>
3	Project Name	2020 HOME CHDO Operating
	Target Area	LMI Housing Activities
	Goals Supported	Make Available Appropriate Housing
	Needs Addressed	Affordable Housing Units
	Funding	HOME: \$160,000
	Description	<p>HUD memorandum dated April 10, 2020 states: That the statutory provisions are suspended and regulatory provisions are waived to permit a PJ to provide up to 10% of its FY 2019 and FY 2020 HOME allocations as operating assistance to CHDOs and to permit a CHDO to receive funding to fill operating budget shortfalls, even if the amount exceeds the higher of \$50,000 or 50% of its annual operating budget. Furthermore, PJs will not be required to include a provision in the written agreement with the CHDO that the CHDO is expected to receive CHDO set-aside funds within 24 months of receiving the additional operating assistance, as required in 24 CFR 92.300(e). The Macomb HOME Consortium submitted a waiver request of April 22, 2020 to the Detroit HUD Field Office. The project budget reflects 10% allocated to CHDO operations as allowed in the waiver request.</p>
	Target Date	6/30/2022

	Estimate the number and type of families that will benefit from the proposed activities	Funds will be used for CHDO operating. Families will benefit from activities conducted by the CHDO. The estimated number and type of families that will benefit from the activity will be reported in the corresponding project.
	Location Description	The CHDO must provide housing activities for households located within the jurisdiction of the Macomb HOME Consortium.
	Planned Activities	CHDO general operating funds.
4	Project Name	2020 HOME Housing Rehabilitation
	Target Area	LMI Housing Activities
	Goals Supported	Make Available Appropriate Housing
	Needs Addressed	Housing Rehabilitation
	Funding	HOME: \$595,519
	Description	HOME funds will be used to provide assistance to income eligible homeowners to complete necessary repairs to their home. Funding includes program income in the amount of \$110,077.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Approximately thirteen (13) households with a combined household income that does not exceed 80% AMI will benefit from the proposed activity.
	Location Description	The activity will take place within the jurisdiction of the Macomb HOME Consortium.
Planned Activities	The activity will provide assistance to income eligible homeowners to complete necessary repairs to their home. Funding includes program income received during the 2019 program year in the amount of \$110,077.	
5	Project Name	2020 CHDO Set-Aside Project Funds
	Target Area	ESG Activities
	Goals Supported	Make Available Appropriate Housing
	Needs Addressed	Affordable Housing Units
	Funding	HOME: \$150,000

	Description	HUD memorandum dated April 10, 2020, subject - Availability of Waivers and Suspension of the HOME Program Requirements in Response to the COVID-19 Pandemic, suspended the 15 percent CHDO set-aside requirement. The Macomb HOME Consortium submitted a waiver request to implement the CHDO set-aside suspension to the Detroit HUD Field Office on April 22, 2020. However, one activity will take place with Macomb County Habitat for Humanity for the construction of one new single-family residential home in Clinton Township.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that one family with a combined household income that does not exceed 80% AMI will benefit from this activity.
	Location Description	The project will take place in Clinton Township.
	Planned Activities	The project will be new construction of a single-family residential housing unit. Once completed the home will be available for purchased by a family with a total combined household income that does not exceed 80% AMI.
6	Project Name	2020 HOME Tenant Based Rental Assistance
	Target Area	LMI Housing Activities
	Goals Supported	Make Available Appropriate Housing
	Needs Addressed	Rental Housing
	Funding	HOME: \$501,400
	Description	HOME funds will be used to provide rental assistance to income eligible families. The program will implement the suspensions and waivers provided under HUD memorandum dated April 10, 2020, subject - Suspensions and Waivers to Facilitate Use of HOME-Assisted Tenant-Based Rental Assistance (TBRA) for Emergency and Short-Term Assistance in Response to COVID-19 Pandemic. The Macomb HOME Consortium submitted a waiver request to the Detroit HUD Field Office on April 22, 2020 to implement allowances provided under the memorandum.
	Target Date	6/30/2022

	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 60 families with a combined household income not to exceed 60% AMI will benefit from this activity.
	Location Description	The activity will take place throughout the jurisdiction of the Macomb HOME Consortium.
	Planned Activities	Tenant based rental assistance will be provided to income eligible households.
7	Project Name	2020 CDBG Administration
	Target Area	Grant Administration
	Goals Supported	Expand Planning, Grant Management and Capacity
	Needs Addressed	Local and Regional Planning
	Funding	CDBG: \$377,461
	Description	Costs related to the administration of the CDBG program.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	N/A - program administration costs only.
	Location Description	The jurisdiction of the Urban County CDBG program.
Planned Activities	Administrative costs include: Macomb County staff and program administration; fair housing activities through the Fair Housing Center of Metropolitan Detroit; and planning through the Macomb Homeless Coalition.	
8	Project Name	2020 CDBG Housing Rehabilitation
	Target Area	LMI Housing Activities
	Goals Supported	Make Available Appropriate Housing
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$435,302

	Description	Provide assistance to income eligible homeowners to complete necessary repairs to their home. There are three different housing rehabilitation programs that are included under this project 1) Minor Home Repair; 2) Limited Housing Rehabilitation; and 3) Comprehensive Rehabilitation. Funding includes estimated program income and Neighborhood Stabilization Program (NSP) program income reallocated to CDBG housing rehabilitation.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 50 families with a combined household income that does not exceed 80% AMI will benefit from the Minor Home Repair Program. It is also estimated that the Limited/Comprehensive Housing Rehabilitation Programs will assist 20 families with a combined household income that does not exceed 80% AMI.
	Location Description	This activity will take place in the jurisdiction of the Urban County CDBG program.
	Planned Activities	Minor Home Repair - up to \$1,000 assistance Limited Housing Rehabilitation - up to \$10,000 in repairs + LBP abatement Comprehensive Housing Rehabilitation - up to \$40,000 in repairs + LBP abatement
9	Project Name	2020 CDBG Public Service Activities
	Target Area	Limited Clientele Activity
	Goals Supported	Provide and Expand Human Services
	Needs Addressed	Transportation Services Senior and Youth Facilities and Services Public Services Food Bank Services
	Funding	CDBG: \$350,668

Description	Provide services including, but not limited to: services for abused children, food assistance, senior citizen programs, homeless programs, and senior and youth programs. To be eligible for CDBG assistance, a public service must be either a new service or a quantifiable increase in the level of an existing service above which has been provided by or on behalf of the unit of general local government (through funds raised by the unit or received by the unit from the State in which it is located) in the 12 calendar months before the submission of the Action Plan. An exception to this requirement may be made if HUD determines that any decrease in the level of service was the result of events not within the control of the unit of general local government.
Target Date	6/30/2021
Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 16,440 persons will benefit from the proposed activities. Those persons will either be presumed beneficiaries or from households with incomes that does not exceed 80% AMI.

<p>Location Description</p>	<p>Macomb Community Action Senior Chore Program - Services are available to residents of the 21 communities that participate in the Urban County CDBG program</p> <p>Care House - Services are available to residents of the 21 communities that participate in the Urban County CDBG program</p> <p>Interfaith Volunteer Caregivers - Services are primarily provided to residents of Bruce Township, Center Line, Eastpointe, Mount Clemens, New Baltimore, Richmond City, Romeo, Shelby Township, Utica, and Washington Township. However, if funding remains after the 3rd quarter, the service provider may assist residents located in any of the 21 communities that participate in the Urban County CDBG program.</p> <p>Macomb County Warming Center - Services are available to residents of the 21 communities that participate in the Urban County CDBG program</p> <p>MCREST - Services are available to residents of the 21 communities that participate in the Urban County CDBG program</p> <p>New Generation Ministries - Services are primarily provided to residents of the City of Mount Clemens. However, if funding remains after the 3rd quarter, the service provider may assist residents located in any of the 21 communities that participate in the Urban County CDBG program.</p> <p>Samaritan House - Services are primarily provided to residents of Armada Township, Village of Armada, Bruce Township, Village of Romeo, Shelby Township, Utica, and Washington Township. However, the service provider may assist residents located in any of the 21 communities that participate in the Urban County CDBG program.</p> <p>Shelby Township Lions - Services are primarily provided to residents of Shelby Township. However, if funding remains after the 3rd quarter, the service provider may assist residents located in any of the 21 communities that participate in the Urban County CDBG program.</p> <p>Turning Point - Services are available to residents of the 21 communities that participate in the Urban County CDBG program</p> <p>Wigs 4 Kids - Services are primarily provided to residents of Chesterfield Township, Eastpointe, New Baltimore, and Shelby Township. However, if funding remains after the 3rd quarter, the service provider may assist residents located in any of the 21 communities that participate in the Urban County CDBG program.</p> <p>Senior Center Programs - Chesterfield Township, Lenox Township, Macomb Township, Ray Township, and Richmond City</p>
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		<p>Large Print Library Books for Seniors and the Disabled - Shelby Township and Utica</p> <p>Dial-A-Ride - Harrison Township</p>
	Planned Activities	<p>Macomb Community Action Senior Chore Program - Grass cutting and snow removal services. Budget: \$61,450</p> <p>Care House - Services for victims of child abuse. Budget: \$73,200</p> <p>Interfaith Volunteer Caregivers - Chore services for seniors and the disabled. Budget: \$8,879.50</p> <p>Macomb County Warming Center - Shelter for the homeless. Budget: \$26,026.20</p> <p>MCREST - Shelter for the homeless. Budget: \$33,061.50</p> <p>New Generation Ministries - Youth summer programs and activities. Budget: \$1,950</p> <p>Samaritan House - Food pantry services. Budget: \$18,500</p> <p>Shelby Township Lions - Holiday food assistance. Budget: \$5,000</p> <p>Turning Point - Assistance to victims of domestic violence. Budget: \$48,000</p> <p>Wigs 4 Kids - Wigs for children as a result of medical needs. Budget: \$3,200</p> <p>Senior Center Programs - Programs and activities for senior citizens. Budget: Chesterfield Township - \$12,979; Lenox Township - \$1,556; Macomb Township - \$31,693; Ray Township - \$2,500; and Richmond City - \$2,599</p> <p>Large Print Library Books for Seniors and the Disabled - Budget: Shelby Township - \$2,000 and Utica - \$600</p> <p>Dial-A-Ride - Transportation for seniors and the disabled. - Budget: Harrison Township - \$17,474</p>
10	Project Name	2020 CDBG Housing Rehabilitation Program Administration
	Target Area	LMI Housing Activities
	Goals Supported	Make Available Appropriate Housing
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$180,000

	Description	Costs related to the administration of the County's Housing Rehabilitation Programs.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	The funding for this activity is dedicated to administration of the County's Housing Rehabilitation programs. Accomplishment data will be reported under each activity.
	Location Description	The activity will take place within the twenty-one (21) CDBG participating communities and the jurisdiction of the Macomb HOME Consortium.
	Planned Activities	Costs related to administration of the County's Housing Rehabilitation programs.
11	Project Name	2020 CDBG Public Facilities and Infrastructure
	Target Area	Low/Mod Area Limited Clientele Activity
	Goals Supported	Improve Public Facilities and Infrastructure
	Needs Addressed	Public Improvements Public Facilities
	Funding	CDBG: \$899,235
	Description	Public facilities and infrastructure projects may include acquisition, construction, reconstruction, rehabilitation, or installation of public facilities and improvements except as provided in 24 CFR 570.207(a), carried out by the recipient or other public or non-profit entities.
	Target Date	12/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 36,265 will benefit from the proposed activities. The beneficiaries will either qualify under the presumed benefit or as having a household income that does not exceed 80% AMI.

	<p>Location Description</p>	<p>City of Center Line Splash Pad - Memorial Park, 25355 Lawrence Ave, Center Line, MI 48015</p> <p>Chesterfield Township Senior Citizen Playground - 47275 Sugarbush, Chesterfield, MI 48047</p> <p>City of Eastpointe Roxana Street Reconstruction - Roxana Street from 9 Mile Road to Stephens, Eastpointe, MI 48021</p> <p>City of Mount Clemens Jones Street Utility Replacement - 96 N. River Road, Mount Clemens, MI 48043</p> <p>Village of New Haven Sidewalk Installation Project - sidewalk gaps located on Havenridge/Margo/Main/Rosell/Clark/Carl Streets, New Haven, MI 48048</p> <p>Shelby Township Dequindre Road Sidewalks - Dequindre Road from Auburn Road to Hamlin Road, Shelby Township, MI 48316</p>
	<p>Planned Activities</p>	<p>City of Center Line Splash Pad - Budget: \$150,000</p> <p>Chesterfield Township Senior Citizen Playground - \$149,734.75</p> <p>City of Eastpointe Roxana Street Reconstruction - \$150,000</p> <p>City of Mount Clemens Jones Street Utility Replacement - \$149,500</p> <p>Village of New Haven Sidewalk Installation Project - \$150,000</p> <p>Shelby Township Dequindre Road Sidewalks - \$150,000</p>

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 Urban County of Macomb is governed by “home rule” and therefore allocates as much CDBG funding as possible to its 21 member communities, less program administration, housing rehabilitation, and public services. As such, the summary of funds provided below includes all available sources of funds for the program. The 21 member communities includes:

- Village of Armada
- Armada Township
- Bruce Township
- City of Center Line
- Chesterfield Township
- City of Eastpointe
- City of Fraser
- Harrison Township
- Lenox Township
- Macomb Township
- City of Memphis
- City of Mount Clemens
- City of New Baltimore
- Village of New Haven
- Ray Township
- City of Richmond
- Richmond Township
- Village of Romeo
- Shelby Township
- City of Utica
- Washington Township

The County will continue to provide annual allocations for all 21 communities for the 2019 program year for public service activities. The communities are responsible for identifying activities and targeted assistance areas, based on citizen input informed by law and regulation, to address local needs and priorities that are consistent with the 2019-2023 Consolidated Plan.

During the review of the County's 2019-2023 Consolidated Plan, the U.S. Department of Housing and Urban Development - Office of Fair Housing and Equal Opportunity noted that the County's Consolidated Plan did not focus enough funds to areas of low-income and minority concentration. Based on this feedback, the County agreed to allocate CDBG bricks and mortar funds on

a competitive basis. The scoring criteria for the competition would award higher points to projects that served areas of minority concentration. For the 2020 program year, nine (9) of the Urban County's twenty-one (21) communities submitted projects through the competition. Six (6) projects were awarded funding, three (3) of which are located in the County's lowest-income and highest minority concentration areas (Mount Clemens, Center Line, and Eastpointe). Of the \$849,234 made available through the competition, \$449,500 or 52% was awarded to these projects.

Geographic Distribution

Target Area	Percentage of Funds
Low/Mod Area	21
Limited Clientele Activity	8
Grant Administration	19
LMI Housing Activities	48
ESG Activities	4
Non-Target Spot Blight	100

Table 5 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Macomb County's CDBG, HOME, & ESG programs are administered through Macomb Community Action. The County's CDBG program encompasses a large geographic area (21 communities) including diverse participating communities. Communities located in the southern end of the County (Centerline, Eastpointe, and Mount Clemens) tend to have concentrations of eligible census block groups, but communities located outside of the areas of concentration also have lower-income families that are in need. As a result each community is provided public service funds on an annual basis. CDBG funds dedicated for bricks and mortar projects are allocated on a competitive basis. The remaining funds are used for program administration and housing rehabilitation activities.

HOME funds received by the Macomb HOME Consortium are distributed to members on a formula basis. The member community then determines how to allocate resources within overall objectives, laws, and regulations. While not limited to areas of concentration, HOME projects administered by the County tend to be in these area as a result of the HOME maximum purchase price or after rehabilitation value limits.

ESG funds are based on needs identified in consultation with the CoC rather than geographic investment. As the only recipient of ESG funds in Macomb County, these funds may be used for eligible activities throughout Macomb County.

Discussion

The Macomb "Urban County" CDBG program includes the following units of general location

government: the Cities of Mount Clemens, New Baltimore, Memphis, Eastpointe, Center Line, Fraser, Richmond, and Utica; the Townships of Richmond, Bruce, Chesterfield, Washington, Ray, Shelby, Harrison, Lenox, Armada, and Macomb; and the Villages of Romeo, New Haven and Armada.

The Macomb HOME Consortium includes the Urban County participants in addition to the Township of Clinton and the Cities of Roseville and Sterling Heights.

The County's ESG program includes all of Macomb County.

Affordable Housing

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

Introduction

In alignment with the 2019-2023 Consolidated Plan, the County has identified a specific housing objective, Objective #2 - Make Available Appropriate Housing, to be of high importance for the 2020 program year.

One Year Goals for the Number of Households to be Supported	
Homeless	18
Non-Homeless	162
Special-Needs	0
Total	180

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	96
The Production of New Units	1
Rehab of Existing Units	83
Acquisition of Existing Units	0
Total	180

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

Discussion

For the 2020 program year this will be achieved through CDBG and HOME funded housing rehabilitation activities.

HOME funds have been allocated for construction of a new affordable housing unit which will be sold to a low- to moderate-income family. Also, HOME funds will be used for a tenant based rental assistance (TBRA) program focused on assisting households that have been affected by the COVID-19 pandemic. The TBRA program will be administered in compliance with the waivers and suspensions provided under HUD memorandum dated April 10, 2020 - Suspensions and Waivers to Facilitate Use of HOME-Assisted Tenant-Based Rental Assistance (TBRA) for Emergency and Short-Term Assistance in Response to the COVID-19 Pandemic. Macomb County submitted a request to implement the waivers and suspensions to HUD on April 22, 2020. The HOME funded activities will take place throughout the jurisdiction of the Macomb HOME Consortium.

The County's ESG funds will be used to assist those at risk of becoming homeless through eligible homelessness prevention activities and those who are currently experiencing homelessness through

rapid re-housing activities. As, the only recipient of ESG funds in Macomb County, ESG funded activities are available to all eligible residents of Macomb County.

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

Introduction

Macomb County does not administer a Public Housing Authority (PHA). However, several communities within Macomb County operate public and assisted housing. Clinton Township, Eastpointe, Mount Clemens, New Haven, Roseville, and Sterling Heights have public housing agencies. In addition, the Michigan State Housing Development Authority (MSHDA) has housing choice vouchers (HCV) in Macomb County.

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

No projects related to public housing are included in the plan.

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

Macomb County does not administer a Public Housing Authority. However, several communities within the jurisdiction of the MHC operate public and assisted housing. The cities of Eastpointe, Sterling Heights, Roseville, Mount Clemens, the Village of New Haven, and the Township of Clinton each have a Public Housing Authority (PHA). The mission of the PHA is to assist low-income families by providing housing opportunities. The commissions address their mission by accomplishing their own goals and objectives. The County supports this mission by providing timely responses to requests for Certificates of Consistency from the PHAs. The County also invites the PHAs to participate in the development of the Consolidated Plan and to comment on the Annual Action Plan. The County also encourages the PHAs to refer program participants who are interested in homeownership to contact housing developers that have been funded through the County's HOME program.

In order to make the County's 2020 Annual Action Plan more accessible to residents of public housing, a copy of the plan was mailed to each PHA. The County's cover letter to the PHA requested that the plan be posted in an area that was accessible to residents. The cover letter also stated that homeownership opportunities were available for residents of public housing and the applicable contact information for those interested.

In addition regarding homeownership, Macomb County encourages partners of HOME funded affordable housing projects to reach out to residents of public housing as part of their marketing strategy.

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

None of the six PHAs serving the Urban County and the Macomb HOME Consortium and are designated

as troubled.

Discussion

The mission of PHAs is to provide safe, sanitary, decent, and affordable housing to low-income families. The PHAs address their mission by accomplishing their own goals and objectives.

Macomb County consulted with the area PHAs on the development of the Consolidated Plan. Macomb County also invited the PHAs to comment on the Annual Action Plan.

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

Introduction

Macomb County is a member of the Macomb County Continuum of Care (CoC). The CoC applies for federal funding every year to support local service providers in their quest to eliminate homelessness in Macomb County. As a member of the CoC, Macomb County works to promote community-wide planning and strategic use of resources to prevent and end homelessness. Macomb County is also an Emergency Solutions Grant (ESG) grantee and these funds are used in the County to help address homeless needs.

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.

The County's Continuum of Care collaborates with shelters and providers to conduct outreach services to homeless persons. Outreach efforts are managed through the CoC to reduce duplication of efforts to ensure the greatest number of persons are assisted. The CoC operates under a coordinated assessment model that provides for a consistent pre-screening and intake assessment of all clients presenting themselves for services within the Continuum. The agencies included in the coordination include emergency shelters, warming center(s), transitional housing, permanent housing programs, youth shelter, street outreach program, and those providing rental and financial assistance to very low income and homeless persons.

The CoC has an Outreach and Engagement Committee/PATH program that performs street outreach on the streets, soup kitchens, warming centers, drop-in centers, and other locations commonly frequented by homeless persons. The program aims to help literally homeless persons with mental health issues, but provides resources to anyone seeking assistance. Homeless persons are offered help with identifying and securing housing, referred to supportive services and linked with mainstream benefits and resources. The Outreach and Engagement Committee will continue to perform outreach efforts to house and shelter as many people as resources allow, in an effort to reduce homelessness.

Addressing the emergency shelter and transitional housing needs of homeless persons.

The 2020 Annual Action Plan implements these objectives to address emergency shelter and transitional housing need by providing funding as follows: Continuum of Care for coordination of homeless prevention and housing activities (CDBG); MCREST and the Macomb County Warming Center for the cost of providing overnight shelter to the homeless (CDBG); Turning Point for the cost of providing overnight shelter to domestic violence or sexual assault survivors (CDBG); and shelter operations and

essential services funds (ESG) to MCREST and Turning Point.

The County will also fund a HMIS component with ESG funding that will be awarded to the HMIS Lead Agency.

Each person that enters the Continuum of Care is assessed for services and placed in the program (permanent supportive housing, rapid re-housing, homelessness prevention, etc.) that best fits their needs. The assessment is standard throughout the CoC. Clients can then be referred to mainstream services. Homeless persons are also added to the Housing Choice Voucher waitlist.

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 2020 Annual Action Plan implements these objectives by providing ESG funding as follows: rapid rehousing to provide rental assistance and/or financial assistance to literally homeless persons and homelessness prevention to provide rental and financial assistance to those at risk of becoming homeless. Macomb County will administer the homelessness prevention program and MCREST, a local emergency shelter will administer the rapid rehousing program as a subrecipient with oversight being performed by the County. ESG requires that case management is provided in conjunction with assistance which should help prevent people from becoming homeless again. Case managers also provide referrals to other service providers to provide comprehensive services to clients. Case managers assist clients with setting goals, finding employment and completing applications for mainstream benefits which can increase the income of clients reducing the likelihood of becoming homeless again.

ESG funds are also used to bridge a person to permanent supportive housing. When a permanent supportive housing unit is not available for a qualified person, rapid rehousing is sometimes used to stably house the client until a permanent supportive housing unit becomes available. Normally, permanently supportive housing requires clients to have a disability and there is a preference for chronically homeless person, therefore using ESG funds in this capacity helps to stably house some of the most vulnerable populations.

The CoC Coordinator coordinates weekly calls with case managers and housing specialists to discuss client's needs. This allows clients to be connect to the correct resources and reduce the amount of time they're homeless.

The CoC will work to implement goals and strategies contained in the 2020-2022 Annual Plan including increasing access to stable and affordable housing. The CoC aims to do this by securing additional

Moving Up Vouchers, creating a Moving Up Voucher waitlist and working with local public housing authorities. The CoC is also exploring the feasibility of implementing the “Rent Well” tenant education program. The program is a 15-hour tenant education program covering key information and skills for becoming a responsible, successful, and stable tenant. The program would also provide landlords with a landlord guarantee fund which would act as an additional security deposit in case their unit is damaged.

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.

As previously stated Macomb County will fund a homelessness prevention program to help low-income individuals and families avoid becoming homeless by providing rental arrearages or rental assistance to find a new more affordable housing unit. This program will be able to serve individuals and families being discharged from publicly funded institutions and systems of care and those receiving public or private assistance as long as they meet eligibility requirements.

The CoC will work to implement the goals and strategies contained in its 2020-2022 Annual Plan, including its goal to increase the availability of the number of permanent affordable housing units provided to persons experiencing homelessness, or who are at most risk of homelessness. Macomb County and the CoC will collaborate with service agencies to provide emergency shelter, transitional housing and permanent housing, as well as assistance to homeless individuals and those at risk of becoming homeless. The County will also continue to financially support public services that provide financial assistance to low-income individuals and those at risk of being homeless.

Discussion

During 2020 program year, the County plans to undertake the following activities to address the supportive services needs for persons who are not homeless but have other special needs (elderly, frail, persons with disabilities, etc.): 1) Senior Activity Programs: Chesterfield Twp., Lenox Twp., Macomb Twp., Ray Twp. and Richmond; 2) Large Print Books: Shelby Twp. and Utica; 3) Dial-A-Ride: Harrison Twp. ; 4) Samaritan House and the Shelby Lions Club will provide food assistance to LMI families; 5) Interfaith Volunteer Caregivers will assist seniors with indoor and outdoor chores; and 6) Macomb Community Action will provide seniors with grass cutting and snow removal services. All of these activities will be funded through CDBG. In addition to these services, the County's Housing Rehabilitation program is available to this population as well as the Minor Home Repair program which can be used to make small scale home improvement repairs. The Housing Rehabilitation program has an accessibility component that can be used to make a home more handicap accessible for elderly or disabled persons. The Housing Rehabilitation program is funded through HOME and CDBG and Minor Home Repair is funded through

CDBG.

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

Introduction

Macomb County has a variety of housing types in all price ranges. It does not control municipal decision-making, but advises communities about land use policies and controls, zoning ordinances, and other actions that can promote affordable housing. It also identifies trends and helps communities plan for them, e.g. a special report detailing the needs of a rapidly aging population, with results shared with municipalities so that they can factor design considerations into their ordinances.

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.

Planned actions include:

- Implement its housing activities in a fair and equitable manner as required by law.
- Continue collaborative efforts with housing providers to promote both affordable home ownership and rental housing opportunities for LMI households.
- The Consortium will continue to strengthen existing relationships, and build new relationships in its efforts to increase affordable housing opportunities in Macomb County.
- Support, if possible, other reasonable proposals for affordable housing.
- Work to address other barriers outlined in the strategic plan as opportunities arise.

Discussion

The County is committed to improving or removing barriers to affordable housing. Staff will continue to evaluate barriers identified in the County's most recent Analysis of Impediments to Fair Housing and partner with agencies such as "One Macomb" (Macomb County's diversity and inclusion initiative), Macomb Habitat for Humanity, Community Housing Network, and the Fair Housing Center of Metropolitan Detroit to remove those barriers.

Fair Housing update:

The County consulted with HUD FHEO representative Imron Bhatti on June 19, 2019 and June 26, 2019 via conference call. The County's HUD Representative, Portia McGoy, also participated in both

conference calls.

The County offered to take the following steps which Mr. Bhatti agreed would satisfy FHEO's concerns:

- 1) Submit a new Analysis of Impediments to Fair Housing (AI) and commitment to amend the Consolidated Plan programs and policies if needed to address the impediments or further goals included in the AI;
- 2) Implement subrecipient fair housing policy monitoring; and
- 3) Competitive funding allocation process, including fair housing-related criteria, for sub-grants to municipalities participating in the Urban County CDBG and/or County-led HOME Consortium.

The County implemented these steps as part of the 2020 Annual Action Plan.

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

Introduction

The Urban County of Macomb (County) and Macomb HOME Consortium (MHC) will engage in a variety of activities intended to further local housing and community development goals.

Actions planned to address obstacles to meeting underserved needs.

The County and the MHC will continue to collaborate and partner with a wide network of housing and human services providers, government officials, business leaders, and citizen to identify areas of need in the community. A coordinated effort will be made to continually improve service delivery systems, reduce duplicative services and to create a process that is flexible enough to meet new needs as they develop.

Actions planned to foster and maintain affordable housing.

The County and the MHC will continue to operate single-family rehabilitation programs. In addition the Consortium will fund affordable housing activities through a collaboration with Community Development Housing Organizations (CHDOs). To further enhance low- to moderate-income neighborhoods, public improvement projects are also planned.

Actions planned to reduce lead-based paint hazards.

Lead risk assessments will be completed for all housing units receiving assistance through the housing rehabilitation program. When conditions are found which indicate a potential lead-based paint hazard, appropriate remedial action will be included as part of the rehabilitation work. All lead work will be conducted in accordance with federal regulations and performed by an appropriately certified and/or licensed contractor. In addition:

- All housing rehabilitation program participants with housing built prior to 1978 are provided with the EPA publication "Renovate Right"
- The Macomb County Health Department provides residents with valuable information on the hazards of lead based paint and where to go for assistance.
- Macomb Community Action's Head Start Program, which is a federally-funded educational program for underprivileged young children, requires blood lead level testing for admission into the program.
- The Michigan State Housing Development Authority offers the "Lead Safe Program" to qualifying households in Macomb County. The program includes lead testing and lead hazard control

services.

Actions planned to reduce the number of poverty-level families.

The Urban County of Macomb and the Macomb HOME Consortium have well-established service networks to provide services to impoverished people. These include:

- Macomb Community Action provides programs to address critical service needs. These include home weatherization and other energy assistance activities, commodity distribution, senior and non-elderly nutrition services, senior chore services (snow removal and grass cutting), Head Start, transportation services, rent and utility assistance, and homelessness prevention
- The Macomb County Health Department provides medical coverage to eligible persons
- Employment training and job counseling through Michigan Works!
- Michigan State University Extension financial management and homebuyer education programs

Actions planned to develop institutional structure.

The County has excellent administrative capacity, with capable staff, excellent relationships with communities and non-governmental entities, and innovative programs. With diminished revenues, we must offset lost resources to maintain our edge. The following are therefore considered for the coming year:

Management Capacity

- Develop additional cost-effective ways to provide affordable housing. The process started with creation of the Macomb HOME Consortium (MHC) and continues to evolve. We have and will continue to, seek additional ways to share resources and costs to maintain an acceptable level of program and management capacity.
- Identify service gaps and improve efficiency and effectiveness in their delivery. The MHC will enhance program design and delivery as well.

CHDO Capacity Development - The MHC supports two non-profit housing organizations, and both are currently CHDOs. All are experienced and have the requisite capacity to succeed in their roles. No special development measures are therefore necessary. That said, the MHC seeks additional opportunities to develop affordable housing and those could result in new CHDO recognition and support. The MHC is ready should that occur.

Expanding the Network of Partners - The County and the MHC will continue efforts to strengthen existing and establish new relationships with service providers to expand and strengthen services in the community.

Sub-recipient Monitoring - The County and the MHC will continue to monitor and assist sub-recipients

and CHDOs in 2020 as required per the Uniform Grant Guidance found at 2 CFR 200. Monitoring will be performed through risk assessment and technical assistance will be provided based on the degree of need.

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

The County and the MHC regularly coordinate with service providers and housing providers by attending coordination meeting, participating in community-wide committees, and engaging local experts to recommend and provide programs for their target populations. Primarily this is done through the collaborative relationship with the area Continuum of Care.

Discussion

Fair Housing

The County will address issues identified in the County's Analysis of Impediments to Fair Housing during the period of July 1, 2020 to June 30, 2021. Communities that participate in the Urban County CDBG program must also commit to addressing at least two (2) impediments each year. Program staff monitor community compliance. In addition, the County will provide CDBG funding to the Fair Housing Center of Metropolitan Detroit, which provides counseling and referral programs, including housing discrimination complaint reception, investigation and resolution services and provision of advice, counsel and referral services for other related inquiries.

Minority and Women's Business Enterprises

The County and the MHC will also continue to encourage the use of minority and women's business enterprises (MBE/WBE) by including a provision in all development agreements. To ensure that W/MBE firms are aware of how the County bids contracts, the County will publish a notice each year in a newspaper of general circulation, indicating that bid opportunities (over \$35,000) are posted on the Michigan Intergovernmental Trade Network (MITN) and that, if interested, they should register on MITN.

Monitoring (CDBG, HOME & ESG)

Internal Monitoring

- Timeliness of expenditures is monitored regularly through IDIS and the County's financial system; and
- Various IDIS reports, draw-down and supporting documentation will be used for internal

monitoring purposes to track project implementation, quality and accomplishments

Subrecipient Monitoring

The County developed a Subrecipient Monitoring & Management Policy in compliance with 2 CFR 200. The policy provides a consistent methodology for conducting risk analyses and monitoring evaluations for all applicable subrecipients.

Major steps include:

- Developing a pre-award risk-based evaluation system for program subrecipient pass-through awards;
- Documenting the process and recording the rationale for selecting subrecipients for monitoring;
- Rating and selecting subrecipients for monitoring; and
- Identifying monitoring objectives

In addition to the steps outlined in this policy, staff will continue to conduct ongoing desk reviews of all subrecipient contract files, including but not limited to:

- Closely monitoring procurement and labor compliance for all subrecipients during the time of procurement, contract award, and during project implementation
- Review of all expenditures to determine if the expenditures are within the approved budget, if they support approved activities, and if costs are eligible
- Contractual compliance, including compliance with applicable Federal rules and regulations, and with state and local standards

HOME Rental Monitoring

- Tenant income will be recertified annually during the affordability period;
- Rents will be approved by the County annually;
- Complete unit inspections; and
- Review financial condition of project with 10 or more HOME units

Program Specific Requirements

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

Introduction

This is an overview of specific requirements by the Community Development Block Grant (CDBG), HOME Investment Partner (HOME), and Emergency Solutions Grant (ESG) programs.

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	50,000
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:	50,000

Other CDBG Requirements

1. The amount of urgent need activities	0
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.	90.00%

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:

Other forms of public investment include funds received by the CHDO include match in the form of donated materials, property, and labor, in addition to private investment such as the funds received by the CHDO from private donations.

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:

The Macomb HOME Consortium's resale and recapture provisions (guidelines are provided as an attachment to AD-26).

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:

In compliance with HOME requirements, the Macomb HOME Consortium includes appropriate affordability of unit's language in all contracts and mortgage notes for all homebuyer projects.

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:

The Macomb HOME Consortium has not planned activities under 24 CFR 92.206(b) and therefore will not use HOME funds to refinance single family or multifamily housing debt during the 2020 program year.

Emergency Solutions Grant (ESG)

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

Please see the attached Emergency Solutions Policy and Procedures dated 1/17/20.

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 Macomb Continuum of Care (CoC) / Macomb Homeless Coalition operate under a Coordinated Assessment model that provides for a consistent pre-screening and intake assessment of all clients presenting themselves for services within the Continuum. The agencies included in the coordination include emergency shelters, warming centers(s), transitional housing programs, permanent housing

programs, the youth shelter and street outreach and those providing short term rental and financial assistance to very low income and homeless individuals and families. The CoC operates under a "No Wrong Door" approach. Individuals and families seeking services are able to enter the coordinated entry system at different access points.

The CoC formed a Coordinated Entry System committee last year which was responsible for updating the Coordinated Entry System Policies and Procedures. This document was distributed to participating agencies with the mission of creating a more efficient and effective operating system.

Each service provider is trained on the use of coordinated HMIS forms created specifically for County wide assessment. The lead agency, the Macomb Homeless Coalition employs the HMIS Coordinator who provides technical assistance and training for agencies facing difficulties with HMIS.

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).

Components (rapid rehousing, shelter operations, homelessness prevention and HMIS) of the Emergency Solutions Grant (ESG) are sometimes administered internally and sometimes awarded to a subrecipient depending on match capabilities, staffing, etc.

Sub-awards are granted through a Notice of Funding Availability (NOFA). Each member of the CoC, including community and faith-based organizations are notified of the NOFA through the CoC listserv. To be eligible to apply under the NOFA the service provider must have a physical presence in Macomb County and must serve Macomb County residents. All applications that contain the proper documents are reviewed by a panel and ranked according to certain criteria, such as, but not limited to: 1) project description/narrative 2) program model 3) performance measures such as number of clients assisted by the agency and review of exit data 4) active homeless participation 5) previous experience 6) active CoC participation and 7) ability to provide 100 percent match. There is also the option for applicants to earn bonus points by being able to provide excess match.

Because NOFA availability is sent through the CoC to agencies that are specialized in homeless needs and services, no local units of government are awarded ESG funding. The funding does serve residents of every local community in Macomb County.

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.

The policy-making entity for the County is the Macomb County Board of Commissioners unless otherwise authorized. In order to comply with 24 CFR 576.405(a), staff has consulted with the Macomb County CoC general membership and the Board of Directors which currently includes one

formerly homeless person. In addition, Macomb Community Action staff attend monthly CoC general membership meetings to present and solicit input regarding ESG policies and procedures and funding decisions.

The County also passes down this requirement to any subrecipient receiving ESG funding. ESG applicants must acknowledge their willingness to comply with this requirement at the time of application. This requirement may be checked at any time, including at monitoring.

In order to encourage public comment from the homeless, **the County's 2020 Annual Action Plan was provided to multiple homeless shelters in the community. The County requested each shelter to post the plan in an area accessible to their clients through the end of the public comment period.**

5. Describe performance standards for evaluating ESG.

The process for evaluating ESG activities involves a review of: 1) project description/narrative 2) program model 3) performance measures such as number of clients assisted by the agency and review of exit data 4) active homeless participation 5) previous experience 6) active CoC participation and 8) ability to provide 100 percent match. There is also the option for applicants to earn bonus points by being able to provide excess match.

The Macomb County CoC is currently developing its own standards for evaluating subrecipients. Once these standards are finalized and adopted, they will be reviewed by Macomb County staff and County ESG performance standards will be updated accordingly.

Macomb County also annually monitors ESG subrecipients based on risk. At the time of monitoring shelter and agency files are reviewed to ensure full compliance with ESG regulations and requirements.

Note: The overall LMI benefit of 90% for this plan includes only the 2020 program year - 1 year certification

Additional HOME program information:

- **Fair Housing and Affirmative Marketing:** Agreements state that the Developer shall not discriminate based on race, religion, marital status, national origin, gender or disability status, and shall affirmatively market units to segments of the population least likely to apply, in conformance with 24CFR Part 92.351. For projects containing five or more HOME assisted units, the Developer will be required to submit an Affirmative Fair Housing Marketing Plan to the PJ

(County) and include a description of their efforts to affirmatively market units to the MHC (County) annually.

- **HOME Affordable Homeownership Limits:** For homebuyer assistance or for rehabilitation of owner-occupied single family housing, the Macomb HOME Consortium follows the HOME affordable homeownership limits for the area as provided by HUD.
- **HOME Application Process:** Applications for HOME funded housing rehabilitation are available on the County's website and at the Macomb Community Action Office of Community Development. Applications are taken on a first-come, first-serve basis. The Macomb HOME Consortium does not currently have an applicant preference. CHDO project funding is allocated by the members of the MHC. When HOME funds are made available for developers, the Request for Proposals is posted on <https://www.bidnetdirect.com/>.
- **New Unit Production:** Projects may include homebuyer, rental and lease to purchase.

Attachments

Citizen Participation Comments



AFFIDAVIT OF PUBLICATION
2125 Butterfield Dr, Suite 102N • Troy MI 48064

MACOMB COMMUNITY ACTION
21885 DUNHAM RD

Ste 10

CLINTON TOWNSHIP, MI 48036

STATE OF MICHIGAN,
COUNTY OF MACOMB

The undersigned *Noela Klomp*, being duly sworn the
he/she is the principal clerk of Macomb Daily, macombdaily.com, macombdaily.com2,
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NOTICE OF PUBLIC HEARING

**2020 ANNUAL ACTION PLAN
MACOMB HOME CONSORTIUM (MHC) – HOME INVESTMENT PARTNERSHIP PROGRAM
(HOME), URBAN COUNTY OF MACOMB – COMMUNITY DEVELOPMENT BLOCK GRANT
(CDBG) & EMERGENCY SOLUTIONS GRANT (ESG) PROGRAMS**

The County of Macomb (County) is required by the United States Department of Housing and Urban Development (HUD) to prepare an Annual Action Plan (AAP) describing the use of the Urban County of Macomb's CDBG and ESG annual allocations and MHC's annual HOME funding allocation. The AAP provides a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used to address the priority needs and operate goals identified by the Consolidated Plan.

2020 MHC HOME Program and Urban County CDBG & ESG Programs Annual Action Plan

Macomb County will, on its own behalf and that of the Macomb HOME Consortium, hold a public hearing at 10:00 am on Wednesday, May 20, 2020, in a computer conference at 18723 Ann Arbor Ave. In order to comply with ADA accessibility requirements, the public hearing will be held virtually. Access the meeting at: meetings.comcast.com/join/joinbyphone?18948947&id=PIN:166293202

The MHC, comprised of the Urban County of Macomb, Clinton Township, and the Cities of Roseville and Sterling Heights, will receive \$1,789,122 in 2020 HOME funding, and the Urban County of Macomb will receive \$1,071,000 in 2020 CDBG and \$107,021 in 2020 ESG funding from the U.S. Department of Housing and Urban Development.

Various communities are listed below. Those in bold print are members of the MHC and have their own CDBG programs. The County's CDBG, ESG, and HOME programs cover all other communities.

Annada Village	Armore Township	Duce Township	Concordia
Charteris Township	Eastpointe	Flint	Hamtramck Township
Leonia Township	Macomb Township	Marquette	Marine City
New Baltimore	West Haven	Rosy Township	Richmond
Richmond Township	Roma	Trinity Township	Ulta
Washington Township	Clinton Township	Roseville	Sterling Heights

If you desire to comment but are unable to attend the public hearing, written comments will be accepted until 4:00 pm on Wednesday, May 20, 2020. Comments concerning the Urban County of Macomb CDBG & ESG Programs can be submitted to: Macomb Community Action, Area Community Development, 21885 Durand Road, Suite 10, Clinton Township, MI 48038.

Comments concerning the MHC HOME funding may be submitted to Macomb Community Action, Area Community Development, 21885 Durand Road, Suite 10, Clinton Township, MI 48038; the Clinton Township Planning Department, 40700 Hamlet Main Rd., Clinton Township, MI 48066; to the Franklin Community & Economic Development Department, 24777 Cedar Ave, Roseville, MI 48066; and to the City of Sterling Heights City Development Division, 43556 Ulta Rd., Sterling Heights, MI 48313.

The County will make every reasonable effort to encourage the participation of minorities, non-English speaking persons, limited English proficiency persons and persons with disabilities. Any individual requiring a reasonable accommodation in order to participate in the public hearing should contact Macomb Community Action – Community Development at (586)466-6558, at least five (5) days in advance of the hearing.

Mark A. Mackel
Macomb County Executive

John Paul Boe
Deputy County Executive



151 Market Street
 Mount Clemens, MI 48043
 586-463-0121
 Fax: 586-783-3515
 www.mccarehouse.org

May 19, 2020

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- Edward Gieske**
 - Bob Bress**
 - Roger Patri**

Ms. Stephanie Burgess, Program Manager
 Macomb County Community Action
 21885 Dunham Road, Suite 19
 Clinton Township, MI 48036

Dear Ms. Burgess:

Thank you for the opportunity to submit written comments regarding the 2019-2023 Upper County Community Development Block Grant Consolidated Plan.

As you are aware, Care House provides an ongoing service to children and families in Macomb County. Care House is the Macomb County Child Advocacy Center, and the only agency in Macomb County providing a coordinated and comprehensive response for child victims of sexual and physical abuse. Our mission is to prevent and reduce the incidence and trauma of child sexual and/or physical abuse through collaborative, multidisciplinary and effective family centered services.

Our main office is located in Mount Clemens and we now also offer services from our Warren satellite office as well. Our goal is to minimize trauma for child victims of abuse and to help the child victim and non-offending family members through the investigation and prosecution phases and provide support to begin the healing process. Care House is one of 34 accredited child advocacy centers (or CACs) in Michigan serving over 53 counties and four tribal nations, and one of almost 900 in the United States.

Care House serves as the "hub" for the complex multi-disciplinary team (MIT) made up of skilled professionals from many organizations including every law enforcement jurisdiction in Macomb County (as well as Michigan State Police, FBI, Homeland Security and Immigration and Customs Enforcement), Protective Services, prosecution, mental health, medical, and victim advocacy personnel. Through the collaboration of all agencies involved, Care House is able to significantly reduce the duplication of community resources for interviews, investigation and advocacy needed for child victims and their families.

It can be difficult to talk about child sexual abuse. Unfortunately, that is a big part of the problem. We cannot wish away child sexual abuse or pretend that it doesn't exist. The truth is that at least one in ten children will become victims of sexual abuse before they turn eighteen. More kids suffer from sexual abuse than from asthma and autism combined. That means that almost three kids in every



Macomb County Child Advocacy Center, Inc.
 Serving Macomb County families since 1986



classroom in Michigan and over twenty thousand of all the children in Macomb County today are living with the trauma of sexual abuse. These numbers are surely much higher than our best estimates because most children never tell. Sadly, living with sexual abuse is a reality for children of every race, gender, and economic status. These children could be your kids, your neighbor's kids or your kids' friends. One could even be you or me.

Over 90% of child victims know their abuser. Those who molest children look and act just like everyone else. Abusers can be neighbors, friends, coaches, teachers, clergy, parents or family members. They can be adults or children. They can be men or women. Kids come to Care House from every community in Macomb County and were spared the trauma of multiple interviews.

After the forensic interview, Care House also offers follow-up support services for child victims and their parents; intervening to promote healing and helping families to cope with the emotional stress and trauma that is caused by not only the acts of abuse, but also the investigative process. These services include crisis counseling, child safety assessments, access to forensic medical examinations, parent and child support groups, trauma-focused therapy sessions, family advocacy, and referrals to other needed community services. As the designated council in Macomb County for the Michigan Children's Trust Fund, Care House also offers child abuse prevention information, education and training for professionals and to the community at large.

Families are never charged for the services they receive at Care House and we provide services to ALL referred children and their non-offending family members. We are also proud to report that according to our most recent independent financial audit, 86 cents of every dollar that comes to Care House is specifically devoted to serving children and families in our community.

The financial, emotional and other stresses that families are facing as a result of COVID-19 are expected to increase and may last for many months after the pandemic has receded. Research has found that when families are stressed, children are at an increased risk of being abused. Despite the fact that children generally are not one of the populations most vulnerable to COVID-19, we also know that the single most critical protective factor for a child's physical and emotional health is the stability of their caregiver and family supports in place. We believe that protecting kids also means protecting their families. During this pandemic, children have been out of school for several months. In many cases, they may come home all day with someone who is abusive or left in the care of an abusive person while the parent works. Under normal circumstances, teachers, school counselors, coaches and day care staff are the front line to notice possible troubling signs of child maltreatment. As mandated reporters, we count on their eyes and ears to see those signs and to report their concerns. We are almost certain that as the coming months bring some relaxing of the restrictions we are currently under, so will it bring an increase in the number of reported cases of suspected child abuse.

Since our opening in 1996, we have conducted over 8,500 child forensic interviews and have served over 9,500 families. Last year, Care House coordinated 758 forensic interviews and support services for suspected child victims of sexual and/or physical abuse in our community.

We depend on support from the community to provide a voice for child victims and a safe place for them to be heard. We are very grateful to have the support of Macomb County as an invested partner. We would be grateful for any additional funding available through the CARES Act to enhance the services we provide, with additional assistance specifically targeted to families affected by the COVID-19 pandemic and to ensure that our workplace maintains a sanitary and safe place for our staff, team members and the children and families we serve.

Thank you for your time and consideration, and as always, for your generous support. Should you have any questions or require additional information, please feel free to contact me at (586) 463-0123.

Sincerely,

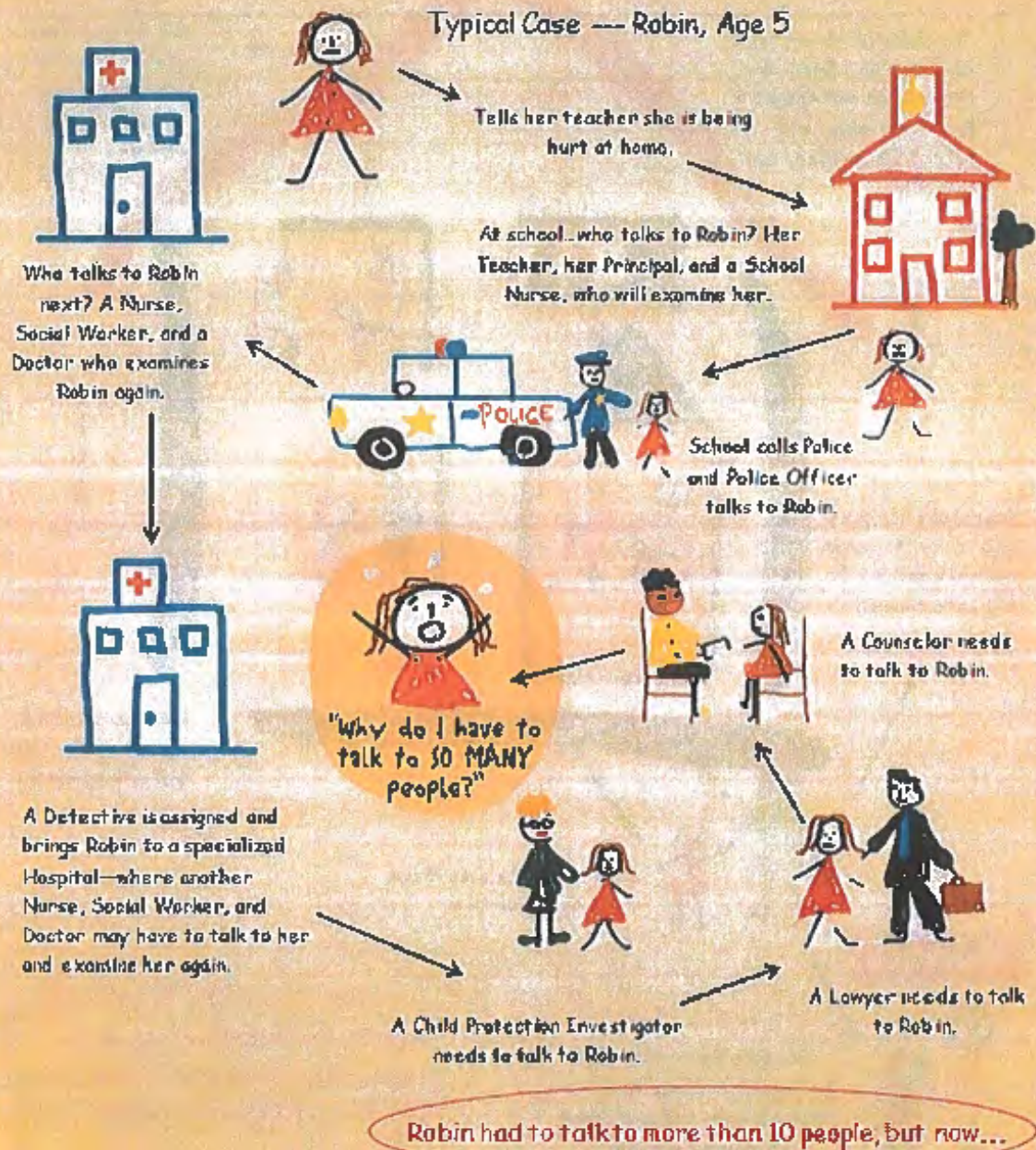


Doris Vazquez-Nolan
Executive Director

Enclosures

CHANGING THE CHILD ABUSE SYSTEM

THIS IS WHAT USED TO HAPPEN WHEN KIDS NEEDED HELP FOR ABUSE



CHANGING THE CHILD ABUSE SYSTEM

THIS IS WHAT HAPPENS TODAY WHEN KIDS NEED HELP FOR ABUSE

The multidisciplinary team consisting of a Detective, CPS worker, and Assistant Prosecutor watch and listen from another room together.

Robin's mom talks with an advocate who will help her understand the system.

Robin tells her story to a trained forensic interviewer in a safe and child-friendly room.

Robin is referred to a counselor, who will help her heal.

Robin comes to Care House with her mom.

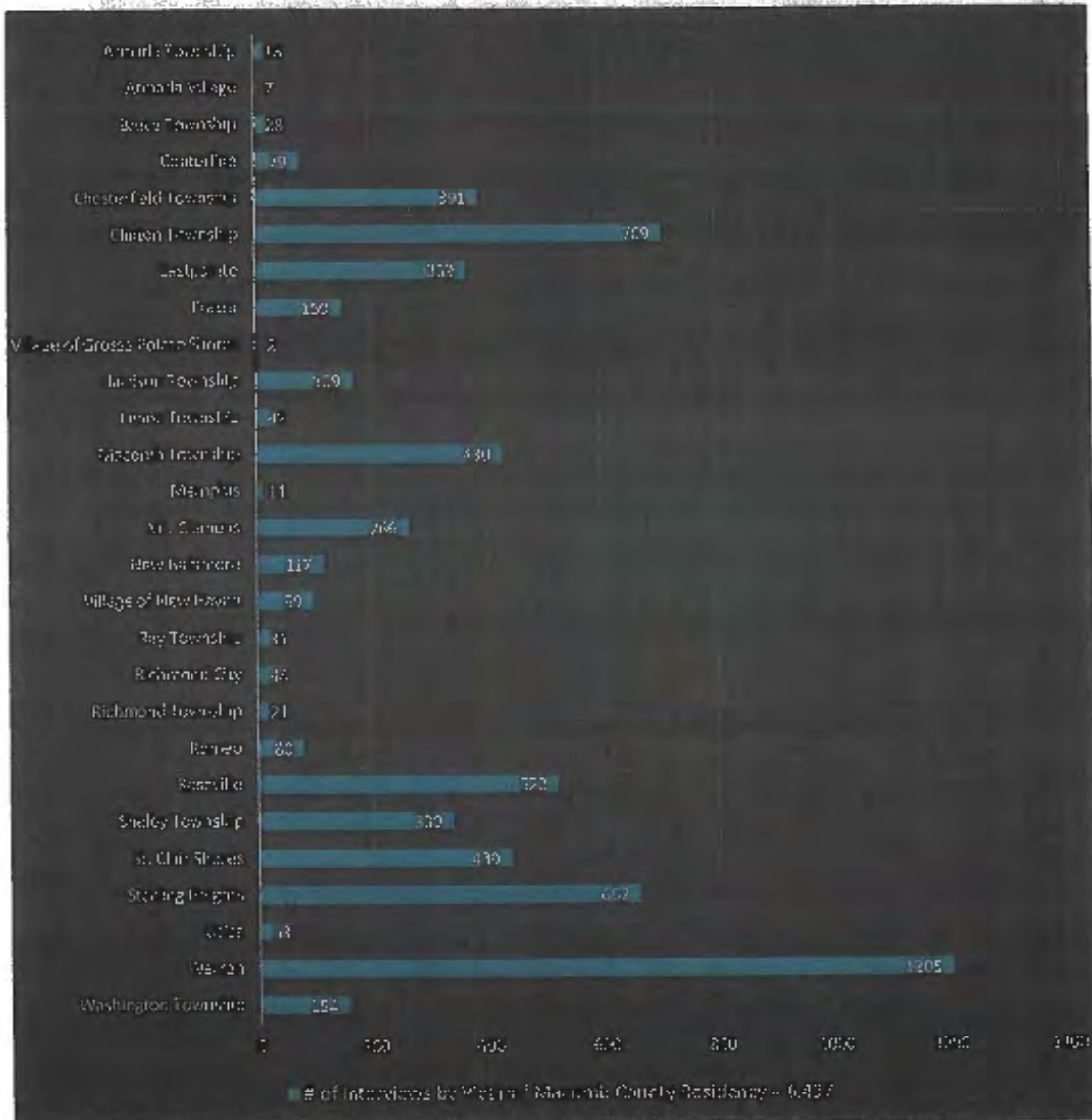
Start Here

The case starts with Robin telling her teacher that she is being hurt by her mom's new boyfriend at home.

...Robin only needed to talk to 3 people, and everyone involved is informed without Robin having to relive the trauma over again



1996 – 2019
of Forensic Interviews by Victims' Macomb County Residency



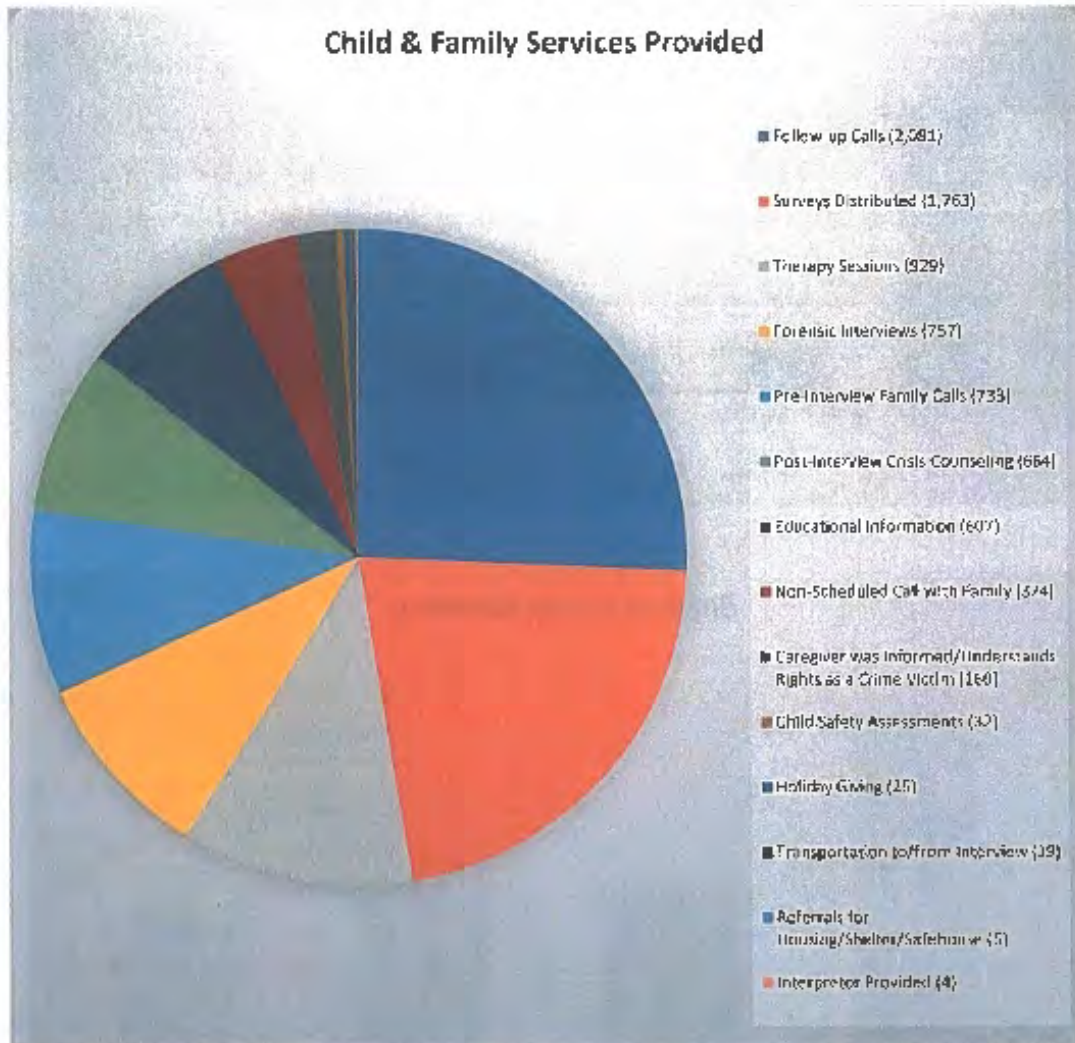
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CARE HOUSE INTERVIEWS BY VICTIMS' MACOMB COUNTY RESIDENCY
1996 - 2019

Macomb Community	1996 - 2011	2012	2013	2014	2015	2016	2017	2018	2019	TOTALS
Macomb Community	9	3	1	1	0	2	0	2	0	18
Armada Township	5	0	0	0	1	0	0	1	0	7
Bruce Township	13	1	0	0	4	0	3	2	5	28
Ce merline	28	2	0	4	11	5	13	8	8	79
Charterfield Township	202	16	21	15	25	19	33	27	33	391
Clinton Township	349	23	25	29	35	37	46	76	89	709
Eastpointe	145	14	18	10	22	20	34	58	48	369
Fraser	70	3	9	8	3	7	18	17	15	150
Grosse Pointe Shores	2	0	0	0	0	0	0	0	0	2
Harrison Township	90	6	1	7	9	16	11	15	14	169
Leroux Township	17	3	3	2	4	1	4	5	3	42
Macomb Township	159	15	17	20	34	49	45	60	30	430
Memphis	6	1	0	1	0	0	0	3	0	11
Mt. Clemens	129	6	9	6	5	29	27	31	24	265
New Baltimore	69	3	0	6	5	3	9	13	9	117
New Haven	49	3	3	5	8	5	4	11	11	99
Ray Township	17	0	1	0	1	0	3	4	5	31
Richmond City	21	3	2	5	4	4	1	1	3	44
Richmond Township	8	0	2	1	2	1	1	4	2	21
Romco	43	2	1	1	7	4	1	13	8	80
Roseville	254	30	39	30	37	31	28	32	41	522
Shelby Township	181	19	16	18	14	23	17	25	26	339
St. Clair Shores	183	25	27	33	24	35	34	32	46	439
Sterling Heights	275	15	20	33	28	38	72	84	97	662
Ubica	30	1	0	4	0	4	4	6	4	53
Warren	505	36	75	80	107	83	84	108	127	1205
Washington Township	46	9	9	9	16	15	13	19	18	154
Other Communities	845	62	91	60	66	79	99	96	91	1489
TOTALS	3750	301	390	388	472	510	605	753	757	7926

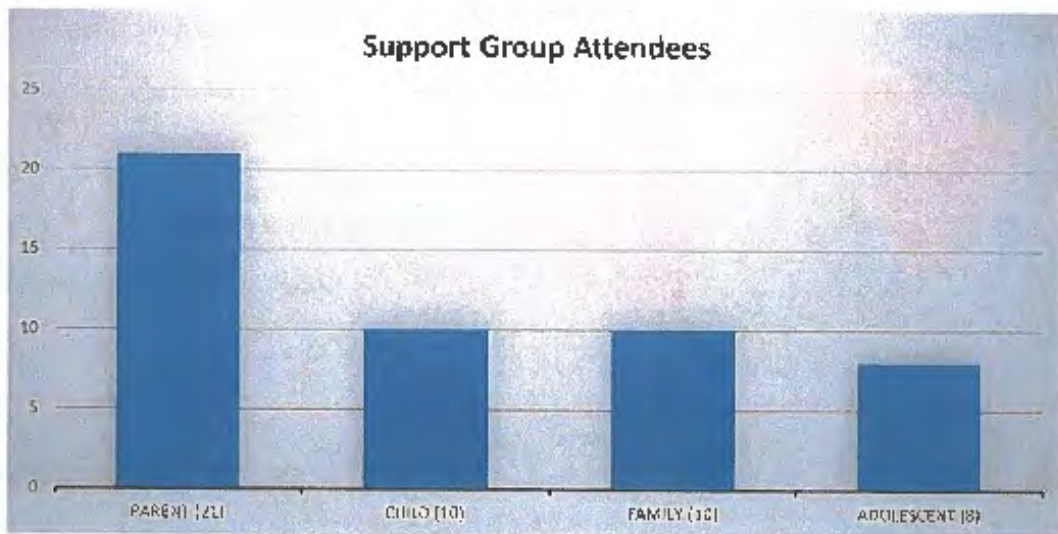
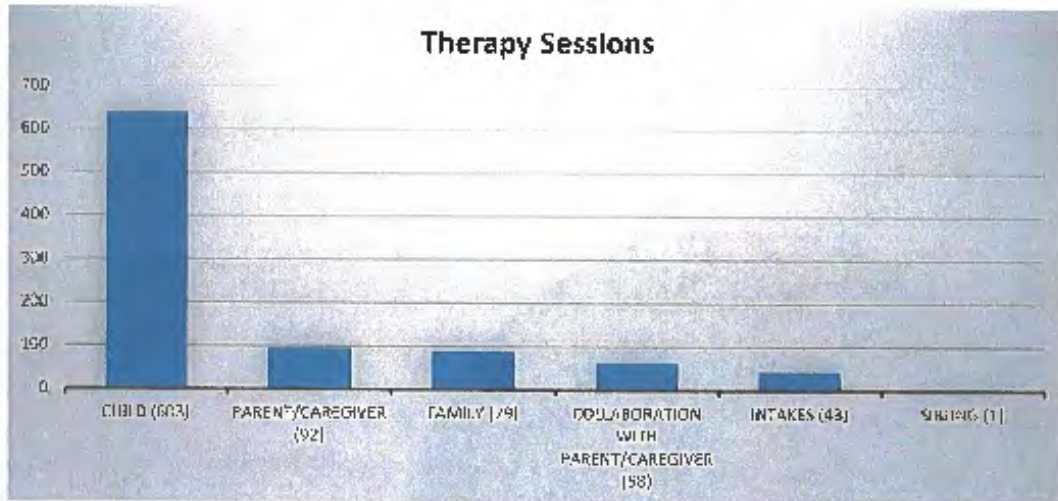


2019 CARE HOUSE SERVICES PROVIDED





2019 CARE HOUSE SERVICES PROVIDED



| 1



Community Housing Network

Community Housing Network Public Comment

Macomb Community Action
Attn: Community Development
21885 Dunham Road, Suite 10, Clinton Township, MI 48036

RE: Amendment to MHC HOME Program and Urban County CDBG & ESG Programs
2019 Annual Action Plan
2020 MHC HOME Program and Urban County CDBG & ESG Programs Annual Action
Plan

It is imperative that Macomb County prioritizes programs and policies that support the current affordable housing and homeless response system. This is especially true due to the economic crisis caused by the COVID 19 pandemic. CHN recommends that the county and HOME consortium continue to use HOME funds for housing production, as that will have longer term impact on the affordable housing needs of the county and not reallocate any HOME funds for use as Tenant Based Rental Assistance. Further, CHN strongly suggests the use of ESG CV and CDGB CV to address the short-term emergency housing needs due to the COVID crisis. With quick and targeted emergency rental assistance combined with housing case management, households experiencing financial difficulties from unemployment or underemployment can bounce back from the crisis caused by the pandemic.

Unfortunately, many working people have been adversely affected by the Covid-19 crisis, losing their incomes overnight. Additionally, few people have savings that allow them to weather such an emergency. Nearly 70 percent of Americans have less than \$1,000 stashed away, according to GOBankingRates' 2019 savings survey. The poll revealed 45 percent have nothing saved. Without financial help, this pandemic will put thousands of households at risk of long-term housing instability and homelessness, and all the known social, health, and economic challenges that housing instability brings.

COVID-19 is causing both health and financial crises concurrently. Many Macomb County households do not have the resources to withstand a prolonged period without income. With 30% of Southeastern Michigan households qualifying as Asset limited, Income Constrained, Employed (ALICE- a United Way of MI coined designation) and many are working in the service industry which has been most severely impacted by Covid-19, the financial effects will be profound. The term "ALICE" – Asset Limited, Income Constrained, Employed – more clearly defines



Phone: 248.928.0111 • Toll-free: 866.282.3119 • Fax: 248.928.0122
5505 Corporate Drive, Suite 300, Troy, MI 48068 • communityhousingnetwork.org
Community Housing Network, Inc. is a 501(c)(3) organization. Donations are tax deductible as allowed by law.



this **population** as households with income above the official Federal Poverty Level, but below a newly defined basic survival income level.

Many of these workers rely on tips, are also contracted workers and do not get paid time off. They are heads of households living paycheck to paycheck with limited savings and unable to absorb this economic shock. This puts these households at risk of losing their housing in the near term, even with orders put in place to prevent eviction. Many will be left with a negative financial situation that will place a heavy, long term burden on their households. Ensuring that families can keep their housing, and that housing continues to be maintained and occupied will help Macomb County successfully recover from the economic crisis caused by COVID-19.

The emergency shelter and homeless assistance system was operating at capacity even before the pandemic occurred. The economic crisis caused by COVID-19 will severely exacerbate the strain on the system due to newly homeless and evicted families and individuals competing for a dwindling supply of resources. Preventing homelessness through rental assistance, mortgage arrears assistance and utility assistance prevents a health and economic crisis from becoming a housing crisis. Having a safe and secure place to call home is known to have direct physical and mental health benefits.

Preventing homelessness helps reduce or prevent the long-term health conditions that make people vulnerable to COVID-19 such as asthma, high blood pressure, and other respiratory issues. Homelessness prevention also assists with keeping communities healthy by keeping people in their homes, rather than having them "double up" with friends and family or move to emergency shelters which helps ensure social distancing and helps prevent the COVID-19 virus from spreading.

The important statewide moratorium on eviction acts as a critical stopgap measure to prevent eviction from leading to immediate homelessness. Once the moratorium is lifted, many households will find themselves in a deep financial hole, if they were unable to pay rent throughout moratorium. While the eviction moratorium will ensure that residents are not immediately displaced, it puts financial pressure on landlords, who without funds from rent are unable to properly maintain the housing or pay mortgages or taxes associated with the property. Many landlords are small business owners with smaller margins and are especially vulnerable to economic disruptions that a crisis such as this can cause.

With rental assistance, vacancies will be reduced, foreclosures prevented, and abandoned structures will be limited. This needed funding will allow landlords to pay debt service, utilities and property taxes on the real estate they own, contributing to the local economy. Prior to the COVID-19 pandemic, housing that was affordable to individuals with low incomes was difficult to find, however non-

corporate landlords that had long standing relationships with nonprofits were willing to rent to those with low incomes and less than perfect credit.

Macomb County has a strong network of non-profit organizations including Community Housing Network (CHN) and others that can quickly, effectively, and prudently administer millions of dollars in housing assistance. Agencies in Macomb County that are a HUD certified Community Housing Development Organization (CHDO) such as CHN are well positioned to administer CDBG rental assistance. A CHDO is a private nonprofit, community-based organization with the capacity to develop affordable housing for the community it serves. To qualify for designation as a CHDO, an organization must meet certain requirements pertaining to its legal status, organizational structure, capacity and experience.

What assistance is needed that CDBG and ESG funds can be used for?

- a. Rental Assistance
- b. Mortgage Arrears Assistance
- c. Utility Assistance
- d. Administrative (accounting, program staffing)

For example, providing 250 households needing a 3-bedroom unit with 3 months rental assistance using HUD established guidelines would total almost \$950,000 in rental assistance alone. While this is a sizeable amount of funding, it is far more helpful and cost effective to prevent homelessness and preserve housing stability for households from a health, community preservation and emotional standpoint.

The impending housing crisis caused by the COVID-19 pandemic will potentially have long term negative economic and community development impacts. Macomb County can avoid the long-term negative impact on the community through the strategic investment of CDBG, ESG, and HOME funds in strengthening the homelessness response system, building and maintaining affordable housing in our communities, and providing housing case management and navigation services.



AFFIDAVIT OF PUBLICATION
2125 Butterfield Dr, Suite 102N • Troy MI 48064

MACOMB COMMUNITY ACTION
21885 DUNHAM RD

Ste 10

CLINTON TOWNSHIP, MI 48036

**STATE OF MICHIGAN,
COUNTY OF MACOMB**

The undersigned Noelle Klomp, being duly sworn the he/she is the principal clerk of Macomb Daily, macombdaily.com, macombdaily.com2, published in the English language for the dissemination of local or transmitted news and intelligence of a general character, which are duly qualified newspapers, and the annexed hereto is a copy of certain order, notice, publication or advertisement of:

MACOMB COMMUNITY ACTION

Published in the following edition(s):

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Sworn to the subscribed before me this 22 May, 2020

Vicki Arsenault
Notary Public, State of Michigan
Acting in Oakland County

VICKI ARSENAULT
NOTARY PUBLIC - STATE OF MICHIGAN
COUNTY OF OAKLAND
My Commission Expires May 11, 2026
Acting in the County of OAKLAND

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**2020 ANNUAL ACTION PLAN
MACOMB HOME CONSORTIUM (MHC) – HOME PROGRAM
URBAN COUNTY OF MACOMB – COMMUNITY DEVELOPMENT BLOCK
GRANT (CDBG) & EMERGENCY SOLUTIONS GRANT (ESG) PROGRAMS**

The MHC comprised of the Urban County of Macomb, Clinton Township, and the Cities of Roseville and Sterling Heights will receive \$1,789,122 in 2020 HOME funding, and the Urban County of Macomb will receive \$1,887,300 in 2020 CDBG and \$,557,031 in 2020 ESG funding from the U.S. Department of Housing and Urban Development.

Member communities included below. These include print and members of the MHC will have their own CDBG programs. The County's CDBG, ESG, and HOME programs cover all other communities.

Armeda Village	Armeda Township	Bruce Township	Center Line
Chesapeake Township	Eastville	Easton	Harrison Township
Lancaster Township	Easton Township	Wentzville	Mount Clemens
New Baltimore	New Haven	Roy Township	Richmond
St. Clair Township	Warren	Shelby Township	Utca
Washington Township	Clinton Township	Roseville	Sterling Heights

AVAILABILITY FOR REVIEW AND COMMENT

The 2020 Annual Action Plan may be reviewed on-line at macomb.org/oa. Comments regarding the 2020 Annual Action Plan will be accepted until 5:00 p.m. Thursday, June 23, 2020, and may be submitted to Macomb Community Action, Attn: Community Development, 21885 Dunham Road, Suite 100, Clinton Township, MI 48036 or emailed to chank.duggan@macomb.org.

Comments concerning the 2020 MHC HOME Program may be submitted to Macomb Community Action, Macomb Community Development, 21885 Dunham Road, Suite 100, Clinton Township, MI 48036; the Clinton Township Planning Department, Attn: Teresa Plank, 60000, Clinton Township, MI 48038; to the Roseville Community & Economic Development Department, 29777 Grand Ave., Roseville, MI 48068; and to the City of Sterling Heights City Development Director, 10641 Union Rd., Sterling Heights, MI 48315.

Mark A. Harkel
Macomb County Executive
John Paul Rice
Deputy County Executive

**Citizen Participation Plan for the
Community Development Block Grant (CDBG) Program
Housing Investment Partnerships Act (HOME) Program
Emergency Solutions Grant (ESG) Program
Macomb Urban County/Macomb HOME Consortium**

This Citizen Participation Plan (CPP) was written and adopted in conformance with the U.S. Department of Housing and Urban Development (HUD) requirements of 24CFR Part 91, Subpart B, which govern the preparation of Consolidated Plans (Con Plan), Annual Action Plans (AAP), Assessment of Fair Housing (AFH) and the Consolidated Annual Performance Report (CAPER) for the Urban County of Macomb (County), and the Macomb HOME Consortium (MHC).

1. Purpose: The CPP has several objectives, including:

- a. adequately informing citizens (including minority, non-English speaking, disabled, lower-income, and those likely to be affected by program activities) so that they can knowledgeably participate in program planning and development; and can review performance for the programs covered.
- b. soliciting views and opinions from the public and community stakeholders, including housing providers, non-profit service agencies, local communities, regional planning entities, and the State of Michigan concerning housing and community development needs, particularly as they relate to lower-income residents.
- c. coordinating program development and delivery between public and private entities which provide housing and human services, and between units of government concerning area-wide issues.
- d. informing citizens of the processes followed in developing and managing the programs covered by the CPP.

2. Encouragement of Citizen Participation

- a. Citizens are encouraged to participate in the development and implementation of the AFH, Con Plan and AAP, in amendments thereto, and in the CAPER. At a minimum, the Con Plan, AAP, CAPER and AFH will be posted on the County's website for citizen review and possible input.
- b. Attention is given to lower-income persons, particularly those living in slums or in blighted neighborhoods, in predominantly lower-income neighborhoods, and in other areas where CDBG, HOME and other community development funds are likely to be proposed for use. "Predominantly low- and moderate income neighborhood" is defined by the County as any census tract block groups located within the jurisdiction of the Urban County CDBG program and the MHC in which at least 51% of the residents have incomes that qualify as low-to moderate-income. Reasonable actions will be taken to encourage participation by citizens, including minority, disabled, and non-English speaking persons. Actions may include, but are not limited to, surveys, outreach meetings, public hearings, and community reports and plans.
- c. The County will collaborate with public housing commissions and with owners and managers of assisted housing developments within the MHC jurisdiction, to facilitate participation by public and assisted housing residents (including any resident advisory boards, resident councils, and resident management corporations) The County will also encourage participation of other low-income residents of targeted revitalization areas in which public and assisted housing is located for the purposes cited above.
- d. The County will inform housing commissions of Con Plan objectives, AAP activities, AFH objectives and CAPERs, particularly as they relate to their developments and the surrounding areas so that they can make this information available at their annual public hearing required for their Agency Plans and Comprehensive Grant programs if, and as, applicable.
- e. The County will take reasonable steps to encourage participation of local and regional institutions, the Continuum of Care and other organizations (including businesses, developers, non-

profit organizations, philanthropic organizations and community and faith based organizations).

3. Citizen comment on the Citizen Participation Plan and Amendments

The County will make this CPP public, by posting it on the County's website, thereby providing citizens, including those with disabilities, opportunity to review and comment on this CPP, and any future related amendments. Citizens will be provided thirty (30) days to comment on the CPP and any future related amendments to the CPP. A public hearing will be conducted for any amendment to the CPP. A notice (including the date, time, and location for the hearing) will be published at least 15 days prior.

4. Dissemination of Information

The Con Plan is a strategic plan, effective for a 3 – 5 year period of time, which sets forth a detailed analysis of housing and community development conditions and needs within the 24 community jurisdiction of the MHC. It also sets forth priority goals and objectives to guide the applicable Programs during the effective period. The County will therefore provide the following information to citizens and stakeholder organizations, for their informed participation in the development of the Con Plan, and AAP, and substantial amendments thereto:

- The amount of assistance to be received (including anticipated grant amounts and program income expected);
- The range of activities that may be undertaken, including the estimated amount of funds that will benefit low- and moderate-income persons; and
- How it plans to minimize displacement of persons, and assist any displaced persons, specifying the types and levels of assistance to be made available by itself or by other legally-responsible entities, even if no displacement is expected.

a. General information, including a summary of the Con Plan and/or AAP (and proposed AFH, as applicable) will be disseminated in the public notice announcing the date(s), time(s) and venue(s) of the hearing(s). Detailed information is available on the websites of the County and individual MHC member communities (when applicable), and will also be provided at the hearing(s) for those who attend.

b. The County will implement the general requirements outlined in item "a" above by:

- Publishing a notice of the pending Public Hearing, Con Plan, AAP, AFH, and CAPER, in a newspaper of general circulation, to provide citizens, public agencies, and other interested parties knowledge of the action, and to direct them to the appropriate website for detailed information, including the draft document. The notice will also advise the public that a copy is available for review at the County offices. Finally, the notice will advise the public of its right to (and how to) submit comments.
- Placing the Con Plan, AAP, CAPER, and AFH on the County's website, along with other program information concerning funding amount(s), eligibility, compliance with program requirements, and other pertinent information.
- Making copies of the proposed Con Plan, AAP, AFH and CAPER available for review at the administration office of Macomb Community Action, the Clinton Township Municipal Building, the City of Roseville City Hall, the City of Sterling Heights City Hall and, when appropriate, area libraries and other public places. One free copy of these documents will be provided to citizens and groups upon request.
- Providing thirty (30) days for public comment, after public notice of the proposed Con Plan and/or AAP and AFH has been published in a newspaper of general circulation.
- Providing fifteen (15) days of public comment after public notice of the CAPER has been published in a newspaper of general circulation.
- The County will make every reasonable effort to encourage the participation of minorities, non-English speaking persons, limited English proficiency persons and persons with disabilities. Efforts may include, but are not limited to, making reports available in a format that is accessible to persons with disabilities (e.g., providing oral, Braille, electronic, or large print copies for the visually impaired); providing translation of notices and vital documents; and translation services at public hearings. Such requests will require at least a five (5) working day notice so that adequate arrangements can be made.

- The County will provide Public Housing Authorities (PHA) with information about its Con Plan activities, and the AFH and Affirmatively Furthering Fair Housing (AFFH) strategy, as applicable, related to its developments and surrounding communities so that the PHA can make this information available at the annual public hearing(s) required for the PHA plan.
- AFFH requirement, as applicable. As soon as feasible, after the start of the public participation process, the County will make available the HUD-provided data and any other supplemental information that will be incorporated into the AFH to residents, public agencies, and other interested parties by providing a link on the County's website that cross-references the data on HUD's website.

5. Public Hearings

In order to encourage informed participation two (2) public hearings per year will be held to obtain resident's views and to respond to proposals and questions. The hearings will be held at two different stages of the program year. These hearings will address housing and community development needs, development of proposed activities, proposed use of funds, proposed strategies and actions for affirmatively furthering fair housing consistent with the AFH, and to review program performance. The County will meet this requirement by holding one public hearing during development of the Con Plan and/or AAP (or the AFH, as applicable). The second public hearing will be for the purpose of reporting program performance prior to submission of the County's Consolidated Annual Performance Evaluation Report (CAPER).

a. Development of the Con Plan:

There will be one public hearing for citizens, and 2 additional focus group meetings with housing, social service, and health agencies, concerning the Con Plan and other basic program requirements. Information concerning funding projections over the life of the Con Plan, the County's plan to minimize displacement and assist any displaced person, and general activity information, will be provided. The major goal will, however, be to obtain views concerning community needs and incorporate them in the Con Plan.

- There will be two focus group meetings: one for housing providers, including housing commissions, and one for social service and health agencies, both of which will include any relevant community and faith-based organizations. These meetings will occur, before the preliminary Con Plan is drafted, so that the views aired may be considered for incorporation.

The public hearing will occur before the Con Plan is published for public comment and submitted for review and approval by the County's Board of Commissioners. This hearing will occur simultaneously with presentation of the County's AAP. MHC members will hold their own hearings in compliance with their own CPP.

b. Development of the Annual Action Plan

Each year, the County must prepare an AAP (outlining strategies, actions, and activities to be undertaken during the coming year) for its CDBG, HOME, ESG, and any special program allocations coming from HUD. The AAP must be developed in consultation with citizens and stakeholders, and at least one public hearing will occur before the plan is published for public comment (MHC members are responsible for developing their CDBG AAP's). There are 21 local communities in the Urban County. CDBG funds are allocated to each community which develops its own program in conformance with law and regulation, and in conformance with the Con Plan. Macomb County and the MHC member communities must develop uses for HOME funding as well.

The 21 local communities in the Urban County CDBG program will meet this requirement in the following manner:

- A general community meeting will be held early in the planning cycle. Communities receive essential program information, and are encouraged to ask questions and discuss concerns at this time.
- Each community will conduct its own public hearing to solicit citizen views on activities, and to provide eligibility, funding and other information essential to inform participation. These

hearings will occur prior to the community submitting its application for funding to the County. Each community must provide its residents with a 15 day notice of the public hearing in a manner in which will result in informed comment (publication, physical posting at local government offices, and/or website posting).

- The County level public hearing will be held before the proposed AAP is published for public comment, prior to its submission for review and Board of Commissioner adoption. This hearing will be coincident with that for the Con Plan, when appropriate.

c. Development of the Assessment of Fair Housing

To obtain the views of the community on AFH-related data and affirmatively furthering fair housing in the jurisdiction's housing and community development programs, the County will hold one public hearing prior to publishing the AFH for public comment.

d. Amendments to the Con Plan or AAP

The County may find it necessary to amend its Con Plan or AAP, due to exigency or to further Con Plan or AAP goals and activities. Sometimes one or several such changes may substantially (defined below) alter the Plan(s) to such an extent that public input is required. The County has therefore established the following criteria to establish a threshold to require further public participation.

Definition of Substantial Amendment:

- Consolidated Plan: Any significant change in priorities, goals and objectives (e.g. new addition or deletion of existing) outlined in the Con Plan.
- Annual Action Plan: One, or several cumulative activity changes, equal to 20% of any year's grant funding, or any change that would significantly affect the outcomes of the Con Plan or AAP as approved by HUD. Change, as defined, affects the size, scope, location, or beneficiaries of activities. MHC members will follow their own citizen participation plans for changes to their CDBG program.

e. Revising an accepted Assessment of Fair Housing

An AFH previously accepted by HUD must be revised and submitted to HUD for review under the following circumstances:

- A material change is a change in circumstances in the jurisdiction of a program participant that affects the information on which the AFH is based to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the AFH no longer reflect actual circumstances. Examples include Presidentially declared disasters, under title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 *et seq.*), in the program participant's area that are of such a nature as to significantly impact the steps a program participant may need to take to affirmatively further fair housing; significant demographic changes; new significant contributing factors in the participant's jurisdiction; and civil rights findings, determinations, settlements (including Voluntary Compliance Agreements), or court orders; or
- Upon HUD's written notification specifying a material change that requires the revision.

Revisions to an AFH, as described in this section, are subject to community participation. The County will follow the notice and comment process applicable to Con Plan substantial amendments provided in the previous section.

f. Citizen Notification: Citizens will have reasonable notice and opportunity to comment on the Con Plan, and AAP (or the final AFH as applicable) or any substantial amendment or revisions to the same: 1) a public notice explaining the nature of, and reasons for, the amendment or revision and, 2) a public hearing. Citizens will be directed to the website of the County or (for HOME) the MHC member communities (when applicable) for detailed information. The notice will be published in a newspaper of general circulation, and will advise the public of the date, time and venue for the

hearing. Citizens will be provided at least thirty (30) days for public comment before such amendments are implemented or the revision to HUD is submitted to HUD for review.

g. Consideration of Comments Received:

The County and MHC member communities will consider any comments or views received (oral, written or electronic), as they pertain to the Con Plan, and AAP (or the final AFH as applicable) or any substantial amendment or revisions to the same. A summary of comments and how they were considered will be attached to the Con Plan, and AAP (or the final AFH as applicable) in conformance with HUD regulations.

6. Performance reports

The County will provide citizens with reasonable notice and an opportunity to comment on program performance before submission of the CAPER. Each member of the MHC will follow its own CPP for its CDBG program. For purposes of the County's CDBG program and the MHC HOME programs, the following applies:

a. Reasonable notice will be provided through notice in a newspaper of general circulation, indicating where the report may be reviewed, and notifying the public that a public hearing will be held for the purpose of evaluating Program performance. The Notice will indicate that the CAPER may be reviewed on the County's website. This Notice will be published at least fifteen (15) days before the Public Hearing. Citizens will be provided at least fifteen (15) days for public comment after public notice of the CAPER has been published in a newspaper of general circulation. The public comment period and public hearing will be conducted prior to submission of the CAPER to HUD.

b. The County and, when appropriate, MHC member communities, will consider written, electronic, and oral comments received before CAPER submission. A comment summary will be attached to the report, along with a narrative explanation of how they were considered.

7. Meetings

The County will inform citizens of the dates and locations for public hearings and meetings through public notices which will appear in a newspaper of general circulation at least fifteen (15) days in advance of the event. Times and locations for meetings will be convenient to potential and actual beneficiaries. Meeting notices will include information related to requests for reasonable accommodations, in accordance with section 504 of the Rehabilitation Act of 1973 and the regulations at 24 CFR part 8, and the Americans with Disabilities Act and the regulations at 28CFR parts 35 and 36 as applicable.

8. Availability to the Public

All Plans, Amendments, and Reports covered by this CPP will be available to the public, including persons with disabilities, at Macomb Community Action, located at 21885 Dunham Road Suite 10, Clinton Township, MI 48036. They will also, when appropriate, be available at the Clinton Township Planning Department, at 40700 Romeo Plank Rd., Clinton Township MI, 48038, at the City of Roseville City Hall, 29777 Gratiot Avenue, Roseville MI, 48066, and at the City of Sterling Heights Development Division, 40555 Utica Rd., Sterling Heights MI, 48314. These documents will also be posted online at the websites of the County and MHC member communities.

9. Access to Records

All plans (Con Plan and/or AAP, and AFH) including amendments and revisions, reports (CAPER), use of assistance under the programs covered by this Plan and documents related to the use of assistance under the program covered by this Plan (except for portions covered by Federal and State privacy statute) are public and are therefore available for review by citizens, public agencies, and other interested parties. Any person or entity may obtain these documents and records, for the preceding five years, by filing a written request with, or calling the County at 586/466/6256 (Urban County and MHC), the Planning Department at 586/286/9325 (Clinton Township CDBG and Clinton Township HOME projects), the Community Development Department at 586/447/4606 (Roseville CDBG and Roseville HOME projects), and the Development Division at 586/446/2724 (Sterling

Heights CDBG and Sterling Heights HOME projects). Five (5) days advance notice is required.

The County will make every reasonable effort to encourage the participation of minorities, non-English speaking persons, limited English proficiency persons and persons with disabilities. Efforts may include, but are not limited to, making reports available in a format that is accessible to persons with disabilities (e.g., providing oral, Braille, electronic, or large print copies for the visually impaired); providing translation of notices and vital documents; and translation services at public hearings. Such requests will require at least a five (5) working day notice so that adequate arrangements can be made.

10. Technical Assistance

Groups representing lower-income persons may receive help so that they may develop funding proposals under any of the programs covered by the Con Plan. The County will provide basic levels of assistance so that the group will be able to make informed decisions regarding its ideas for funding. No monetary assistance will be provided. MHC members will follow their citizen participation plans in matters pertaining to their CDBG programs.

11. Complaints

The Urban County (and its 21 participating communities) will substantively respond in writing to oral and written questions and complaints pertaining to the Con Plan, AAP, Amendments, AFH (including revisions) Environmental Reviews Records, Requests for the Release of Funds and the CAPER in a timely manner, usually within fifteen (15) working days, where practicable MHC members will follow their citizen participation plans in matters pertaining to their CDBG programs.

12. Use of Citizen Participation Plan

The County will follow the measures outlined in this Plan, except in cases of public exigency, or unless otherwise instructed by HUD. MHC members will follow their citizen participation plans in matters pertaining to their CDBG programs.

13. Responsibility for Development and Implementation

Nothing in this Plan restricts the responsibility or authority of the Urban County, its participating communities, or MHC member communities in Program Development and implementation. This provision does not apply to the CDBG programs of Clinton Township, Roseville and Sterling Heights.

14. Exceptions

In event of a local, state, and national natural disaster or declaration of emergency, existing and new funding may be allocated or re-allocated in an expedited time frame. To streamline the allocation process and reduce delays in accessing grant funds Macomb County and the members of the Macomb HOME Consortium will follow HUD notices, waivers, award letters or other HUD communication. To achieve this minimum citizen participation requirement, it will be applied per HUD notices, waivers, award letters or other HUD communication to the Consolidated Plan and/or substantially amended Action Plan(s).

Expedited procedures must include notice and reasonable opportunity to comment of no less than five (5) days. In addition, meetings may be facilitated by the most feasible means at the time (ex: virtual or call-in meetings in lieu of public gatherings). Meetings must still accommodate and provide information to those with vision and hearing impairments to the best extent feasible. At a minimum, the meeting must still comply with the Open Public Meetings Act.

Grantee Unique Appendices

**MACOMB HOME CONSORTIUM
RECAPTURE AND RESALE PROVISIONS**

The HOME program permits the use of funds for new construction and acquisition, rehabilitation, and resale of homes to income-eligible homebuyers. Assistance may be provided as a subsidy to the developer and/or down-payment assistance to the homebuyer.

The HOME program requires that all assisted properties remain affordable for a specific period of time based on the amount of HOME funds provided to the project. To accomplish this, the County must enforce with resale or recapture provisions, per 24 CFR 92.254.

The Macomb HOME Consortium uses the recapture provision for all homebuyer programs unless the value of the assisted home, upon completion, is greater than the HOME Homeownership Value limit, in this instance the resale method must be used.

The following provisions will apply to subrecipients, consortium members, CHDO's, or other entities that currently provide homebuyer assistance with HOME funds provided through the Macomb HOME Consortium (MHC):

- The length of the long term affordability:

Homeownership assistance HOME amount per-unit	Minimum period of affordability in years
Under \$15,000	5
\$15,000 to \$40,000	10
Over \$40,000	15

- The amount subject to recapture is the direct subsidy received by the homebuyer. The subsidy includes the HOME investment that enabled the homebuyer to purchase the property.
- The MHC will require full repayment of the assistance provided to the homebuyer if the home is sold during the affordability period. However, if there are no net proceeds or insufficient proceeds to recapture the full amount of the HOME investment due, the amount subject to recapture will be limited to what is available from the net proceeds. Net proceeds are defined as the sales price minus superior non-HOME loan repayments and any closing costs.
- If the value of assisted home, upon completion, is greater than the HOME Homeownership Value limit, the home must be sold to the buyer for no more than the applicable limit. The resale method at 92.254(a)(5) must be used in this circumstance. If resale is used, the subsequent homebuyer must qualify as a low-income. The sales price may not exceed a price that is not affordable to households at 70% to 80% AMI and must be approved by the County. Other mechanisms to enhance affordability may include down-payment assistance or a second mortgage. Under resale the original homebuyer will receive a fair return on their investment. The original owner's investment may include down payment and/or closing costs made at the time of initial purchase; principal amortized on senior debt during ownership; and eligible capital improvements (improvements made to the structure of a major system over \$3,000 that was properly permitted and inspected and that the actual cost can be documented with 3rd party receipts). The value of the owner's investment will be adjusted by using the Housing Price Index.
- Written agreements will reflect the recapture (and when applicable, resale) requirement.
- Affordability provision will be enforced through a recorded mortgage.

NOTE: the affordability requirements listed above do not apply to the County's HOME funded Housing Rehabilitation Program for owner-occupied properties

MACOMB HOME CONSORTIUM RESALE – FAIR RETURN ON INVESTMENT

The Macomb HOME Consortium's (MHC) resale requirements must ensure that, if the property is sold during the period of affordability, the price at resale provides the original HOME-assisted homebuyer a fair return on investment (including the original homebuyer's initial investment and any capital improvement).

The MHC must define fair return on investment so that the original HOME-assisted homebuyer understands how his or her investment and any return on that investment may be determined at the time of sale. The following is the MHC's definition of fair return on investment.

The MHC will use the average change in the Housing Price Index (HPI) over the period of ownership to determine the original homebuyer's fair return on investment. The basis for calculating the fair return includes: 1) the HOME-assisted homebuyer's original investment (i.e. any down payment), plus, 2) capital improvements made by the original homebuyer that may add value to the property. Capital improvements are generally investments over \$3,000 in the home's infrastructure (such as roofing, heating systems, kitchen or bathroom remodels, etc.) and do not include routine maintenance (such as painting). Improvements must be properly permitted and inspected and actual costs documented with 3rd party receipts

EXAMPLES OF FAIR RETURN ON INVESTMENT

The MHC provides HOME funds for the construction of a single-family homebuyer unit. The homebuyer provides \$5,000 for a down-payment. The MHC uses the average change in the Housing Price Index over the period of ownership as its standard index for fair return on investment.

The original homebuyer decides to sell his home during the period of affordability and is able to sell the home at a price that permits the original homebuyer to realize a full return on his investment as defined in the PJ's resale provisions.

In the past year, the original homebuyer undertook a \$9,000 kitchen renovation. The PJ has determined that the average change in the Housing Price Index over the original homebuyer's period of ownership is 3.5 percent. The original homebuyer's initial down-payment investment of \$5,000 plus the kitchen improvements, valued at \$9,000, would result in a fair return of \$490. Total return at sale, assuming the price at sale permits the original homebuyer to realize a full return on his investment, would include the original homebuyer's initial investment of \$5,000, plus the \$9,000 investment in capital improvements, plus a \$490 fair return on both of those investments.

$$\begin{aligned} &(\$5,000 + \$9,000) \times 3.5\% = \$490 \text{ fair return on initial and capital investments} \\ &\$5,000 + \$9,000 + \$490 = \$14,490 \text{ total return to the original homebuyer at sale} \end{aligned}$$

It is important to note that in certain circumstances, such as a declining housing market where home values are depreciating, the original homebuyer may not receive a return on his or her investment because the home sold for less or the same price as the original purchase price. For example:

A homebuyer put a \$5,000 down-payment on a \$150,000 home. One year later he invested \$9,000 in kitchen improvements. The original homebuyer decides to sell the home three years later. Assuming the PJ used a 3.5 percent increase in the Housing Price Index to calculate fair return, the original homebuyer would expect to receive a \$490 return on his investment (see example immediately above).

Since the original homebuyer purchased the home four years ago, the local housing market declined significantly. The fair market value of his home is now \$140,000. Because there is a \$10,000 loss on the sale, it is not possible to provide the original homebuyer's \$490 fair return on his investment, or return any portion of his \$14,000 investment.

Macomb County Community Development

Emergency Solutions Grant

Emergency Shelter, HMIS, Homelessness Prevention and
Rapid Re-housing Policy and Procedures

Revised: January 17, 2020

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Program Description

Macomb County receives ESG funds awarded by HUD under the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act). The HEARTH Act improves administrative efficiency and enhances response coordination and effectiveness in addressing the needs of homeless persons. The Act adds short- and medium-term rental assistance and services to rapidly re-house homeless people, and places greater emphasis on helping people quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. In addition, the HEARTH Act provides grantees with the programmatic framework to maximize communitywide planning and strategic use of resources, and to improve coordination and integrate with mainstream services to increase efficiency, including services funded by other programs targeted to homeless people.

HUD drew from its recent program experience with the Homelessness Prevention and Rapid Re-Housing Program (HPRP), a temporary program, to establish the regulations for the ESG program, a permanent program. ESG funds must exclusively be used for Street Outreach, Emergency Shelter, Homelessness Prevention Assistance, Rapid Re-housing Assistance, Homeless Management Information Systems (HMIS), and Administration. These funds must exclusively be used for Street Outreach, Emergency Shelter, Homelessness Prevention Assistance, Rapid Re-housing Assistance, Homeless Management Information Systems (HMIS), and Administration. However, the amount of funds that will be available to recipients annually will likely not be enough to serve all persons at risk of homelessness. The County will allocate funding to components in its Annual Action Plan.

I. Grant Terms

Emergency shelters, Street Outreach providers, Homelessness Prevention/Rapid Re-housing providers and the HMIS Lead for the Macomb County Continuum of Care (CoC) may be granted ESG funds through Macomb County. All grant terms will be clearly stated in subrecipient agreements. There may be the need for grant extensions.

During the term of the grant, sub-recipients may be evaluated for performance, data collection, and use of funds. Funds may be redistributed based upon this evaluation.

II. Target Population

This program is targeted to individuals and families who "but for" this assistance will become or remain homeless.

The Emergency Shelter component of this program is targeted to serve those homeless individuals and families who are residing in emergency shelters within Macomb County.

The Street Outreach component of this program is targeted to serve program participants who meet the criteria under paragraph (1) of the "homeless" definition in 24 CFR 576.2. Program participants who receive Street Outreach services primarily reside in a place not meant for human habitation (parks, abandoned buildings, bus stations, etc.).

The Rapid Re-housing component of this program is targeted to serve program participants who meet the criteria under paragraph (1) of the "homeless" definition in 24 CFR 576.2 or who meet the criteria under paragraph (4) of the "homeless" definition and live in an emergency shelter or other place described in paragraph (1) of the "homeless" definition. The Rapid Re-housing assistance must be provided in accordance with the County's written procedures provided in Attachment #1.

The Homelessness Prevention component provides housing relocation and stabilization services and short- and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the "homeless" definition in 24 CFR 576.2. This assistance, referred to as homelessness prevention, may be provided to individuals and families who meet the criteria under the "at risk of homelessness" definition, or who meet the criteria in paragraph (2), (3), or (4) of the "homeless" definition in 24 CFR 576.2 and have an annual income below 30 percent of median family income for the area, as determined by HUD. Homeless Prevention must be provided in accordance with the County's written procedures provided in Attachment #2.

The HMIS component of this program is targeted to the HMIS Lead Agency for the Macomb County CoC, but under certain circumstances funding may be allocated to another agency. The HMIS component is used to pay the costs of contributing data to the CoC's HMIS. The HMIS component must be provided in accordance with the County's written procedures provided in Attachment #3.

III. Use of the Funds

There are six categories of eligible activities for ESG funds:

1. Street Outreach
2. Emergency Shelter
3. Homelessness Prevention Assistance
4. Rapid Re-housing Assistance
5. HMIS
6. Administrative

These eligible activities are intentionally focused on housing—either financial assistance to help pay for housing or services designed to keep people in housing or to obtain housing. This assistance is not intended to provide long-term support for program participants, nor will it be able to address all of the financial and supportive services needs of households that affect housing stability. Rather, assistance should be focused on housing stabilization, linking program participants to community resources and mainstream benefits, and helping participants develop a plan for preventing future housing instability.

Street Outreach

Essential Services: services related to reaching out to unsheltered homeless individuals and families, connecting them with emergency shelter, housing, or critical services, and providing them with urgent, non-facility-based care. Eligible costs include engagement, case management, and transportation for outreach staff.

Emergency Shelter

Essential Services: Case management related to assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant is eligible. Component services and activities consist of:

- (A) Using the centralized or coordinated assessment system as required under 24 CFR 576.400(d);
- (B) Conducting the initial evaluation, including verifying and documenting eligibility;
- (C) Counseling;
- (D) Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;
- (E) Monitoring and evaluating program participant progress;
- (F) Providing information and referrals to other providers;
- (G) Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and

(H) Developing an individualized housing and service plan, including planning a path to permanent housing stability.

Shelter Operations: including maintenance, rent, repair, security, fuel, insurance, and utilities.

Homelessness Prevention Assistance

Leasing assistance, as necessary, to prevent the individual or family from becoming homeless when the assistance is necessary to help program participants regain stability in their current permanent housing or move into other permanent housing and achieve stability in that housing. See Attachment #2 for current eligible costs and Homelessness Prevention program requirements.

Rapid Re-housing Assistance

Housing relocation and stabilization services (case management). Leasing assistance as necessary to help individuals or families living in shelters or in places not meant for human habitation to move as quickly as possible into permanent housing and achieve stability in that housing. See Attachment #1 for current eligible costs and Rapid Re-housing program requirements.

HMIS

The HEARTH Act requires that data collection and reporting for ESG be conducted via HMIS. Adults and children residing in the household must be entered into HMIS. Domestic Violence shelters may use a system comparable to HMIS. See Attachment #3 for current eligible costs and HMIS program requirements.

ESG funds cannot be used for/to:

- Continuum of Care Coordinating Expenses
- Expand the number of beds in an existing shelter or to supplant existing mainstream resources;
- Assist individual(s)/households in transitional housing;
- Assist the homeless or those at risk of becoming homeless to expunge and/or pardon their criminal records or for re-entry advocacy to help ex-offenders get jobs;
- Shelter-focused case management;
- Pay for foreclosure prevention;
- Pay rental assistance in rent-to-own situations;
- Provide assistance to those living in subsidized housing, including those with a Housing Choice Voucher (except security deposit);
- Pay utilities and/or rent for tenants renting a unit owned by a family member;
- Mortgage payments;
- Utility assistance for homeowners;
- Motel/hotel Vouchers;
- Furniture;
- Pet Care;
- Credit card bills or other consumer debt;
- Car repair for program participants;
- Food;
- Medical or dental care and medicines;
- Clothing and grooming;
- Entertainment activities;
- Work or education related materials;
- Cash assistance to program participants; and
- Payment of licenses, certifications, and general classes (classes not specifically related to these funds);

IV. Roles and Responsibilities

Macomb County Community Development will:

- Consult with the CoC when:
 - Determining how to allocate ESG funds each year,
 - Developing performance standards for projects and activities assisted by ESG funds,
 - Evaluating outcomes of projects and activities assisted by ESG funds, and
 - Developing funding, policies and procedures for the administration and operation of the HMIS
- Evaluate the quality of services based on documented outcomes of subrecipients, in partnership with the CoC.

The HMIS Lead Agency will:

- Oversee Macomb County's Homeless Management Information System, ensuring that HUD requirements are met.
- Provide Macomb County Community Development, upon request, with data and reports including, but not limited to, ESG CAPER reports, the annual Point in Time (PIT) Chart and client served reports.
- Consult with Macomb County Community Development regarding policies and procedures for the administration and operation of the HMIS.
- Provide allowable services as defined within the regulations and as specified in their contract with Macomb County.
- Ensure compliance with grant terms and provide Macomb County Community Development access to financial and programmatic records.
- Request payment and provide necessary supportive documentation to Macomb County Community Development.
- Refrain from engaging in inherently religious activities, such as worship, religious instruction or proselytization as part of the programs or services funded under ESG. If an organization conducts these activities, the activities must be offered separately, in time or location, from the programs or services funded under ESG, and participation must be voluntary for program participants.
- Refrain from discriminating against a program participant or prospective program participant on the basis of religion or religious belief.
- Make known that the use of facilities, assistance and services are available to all on a nondiscriminatory basis. The way in which the subrecipient communicates this must be likely to reach persons of any particular race, color, religion, sex, age national origin, familial status and disability.

Subrecipients will:

- Provide allowable services as defined within the regulations and as specified in their contract with Macomb County.
- Ensure compliance with grant terms and provide Macomb County Community Development access to financial and programmatic records.
- Coordinate and integrate, to the maximum extent practicable, ESG funded activities with other programs targeted to homeless people, as well as mainstream housing, health, social services, employment, education and youth programs to provide a strategic, community-wide system to connect participants to such services, as well as prevent and end homelessness. Subrecipient's will work closely with community agencies to collaborate and learn strategies for delivering services efficiently and effectively to end homelessness in Macomb County. A list of programs targeted to homeless people and mainstream resources can be found at 24 CFR 576.440 (b) and (c).

- Use the CoC's coordinated assessment system. Domestic violence agencies may choose not to use the coordinated assessment system, but may use an alternative, comparable system.
- Conduct an intake and assessment on each client to determine eligibility for assistance for emergency shelter, essential services and other types of services required to regain stability in permanent housing. Intake and assessment are standardized forms within the HMIS System. A copy of these forms must be maintained in the participant file.
- Require case managers to contact program participants receiving Rapid Re-housing or Homelessness Prevention at least once per month. When possible, contact should be in person.
- Develop a plan with program participants receiving Rapid Re-housing or Homelessness Prevention to retain permanent housing once ESG assistance ends.
- Ensure that program participants receiving medium-term (4-8 months) rental assistance through Rapid Re-housing or Homelessness Prevention pay 30% of their gross monthly income or 10% of their net monthly income towards rent.
- Meet the minimum safety, sanitation and privacy standards outlined in 24 CFR 576.403.
- Enter client information into HMIS. Domestic violence agencies use an alternative, comparable system.
- Routinely review and correct HMIS data quality issues and monitor outcome performance.
- Maintain financial and client level records to support billings. Retain records for five years.
- Request payment and provide necessary supportive documentation to Macomb County Community Development.
- Collect and submit quarterly Progress Reports that address specific performance outcomes supported by HMIS data. Domestic violence agencies use an alternative, comparable system.
- Involve homeless individuals and families, to the maximum extent practicable, in maintaining and operating facilities assisted under ESG, as well as in providing services assisted under ESG.
- Refrain from engaging in inherently religious activities, such as worship, religious instruction or proselytization as part of the programs or services funded under ESG. If an organization conducts these activities, the activities must be offered separately, in time or location, from the programs or services funded under ESG, and participation must be voluntary for program participants.
- Refrain from discriminating against a program participant or prospective program participant on the basis of religion or religious belief.
- Make known that the use of facilities, assistance and services are available to all on a nondiscriminatory basis. The way in which the subrecipient communicates this must be likely to reach persons of any particular race, color, religion, sex, age national origin, familial status and disability.
- Ensure compliance with federal regulations. It is the responsibility of the sub-recipient to maintain familiarity with all applicable regulations.
- Develop, implement and follow their own policies.

V. Eligibility Determination

Participant Files - The sub-recipient is required to maintain their ESG participants' file information. All participant files must be documented using the centralized intake forms provided by the CoC. The intake and assessment must be completed in HMIS, unless the shelter is for survivors of domestic violence. A copy of these documents must be stored in the participant's file. Electronic copies must be made available upon request. Files must also contain case management notes.

Release of Information Form – HMIS

A Release of Information Form must be signed by each household member age 18 or older with a copy in file. A Release of Information Form should be every participant file regardless of the type of ESG assistance the participant is applying for/receiving.

Emergency Shelter, Street Outreach, Rapid Re-housing and Homelessness Prevention Identification Documentation

To the extent possible, ESG subrecipients should obtain identification documentation for all household members whether receiving case management, shelter, street outreach services, Rapid Re-housing or Homelessness Prevention. Documentation should include one of the following:

- Driver's License/State Identification Card
- Social Security Card
- Medicaid Card (as a last resort for children only)
- Birth Certificate
- Passport

Certifying Homeless Status

Program participants must certify their homeless status. Intake staff must follow HUD's Preferred Order for Documentation. Subrecipients providing emergency shelter, street outreach or victim services are exempt from following preferred order requirements.

Preferred Order for Documentation

In order to verify homeless status, intake staff should obtain the required documentation. HUD has issued the following preferred order for documentation (24 CFR 576.500):

1. Third Party
 - a. Source Documents
 - i. Pre-existing records (HMIS shelter stay record, hospital discharge or court ordered eviction notice, etc.)
 - b. Written
 - i. Official communication (agency email or letter written on agency stationery)
 - ii. Must include service dates
 - iii. Signed and dated by agency representative certifying statement as true and complete
 - iv. Additional standards depend on criteria/condition of Homeless Definition being used
 - c. Oral
 - i. Recorded oral statements by intake staff or of third party providing verification
 - ii. Must include service dates
 - iii. Must be signed and dated by intake staff certifying statement as true and complete
2. Intake Staff Observations
 - a. Intake staff notes on their observations/assessments
 - i. Must be signed and dated by intake staff certifying statement as true and complete
3. Self-Certification*
 - a. Written statements must be signed and dated
 - b. If self-certification must be verified:
 - i. Documentation that certification was verified or due diligence documentation
4. Due Diligence
 - a. Describe efforts to obtain third party verification (phone logs, email, letters, etc.)

- b. Describe obstacles to obtaining verification/documentation
- c. Must be signed and dated by intake staff

*A written self-certification is sufficient only if no other proof of homeless status is available.

Record Keeping Requirements – Acceptable Forms of Documentation

1. Category 1- Literally Homeless
 - a. HMIS street outreach service record
 - b. HMIS shelter stay record
 - c. Written observation by an intake worker
 - d. Written referral from another agency (includes email from agency email address)
 - e. Self-certification stating that program participant was residing in a shelter or on the street
 - f. If exiting an institution – one of the forms of evidence listed above and discharge paperwork, or referral from another agency with service dates (duration of stay must be 90 days or less)
2. Category 2- Imminent Risk of Homelessness
 - a. Court order from eviction
 - b. If in a hotel/motel – evidence they lack financial resources to stay and self-certification supported by documentation (e.g. bank statement showing lack of funds)
 - c. In another housing situation (doubled-up) – self-certification supported with third party verification or due diligence (e.g. signed and dated letter from homeowner/lease holder expelling applicant from housing situation)
 - d. Self-certification – written statement that is documented and verified and certification that subsequent housing is not available and certification that the program participant lacks financial resources and support to obtain housing
3. Category 3- Homeless Under other Federal Statutes
 - a. Certification (letter) from nonprofit or government agency that the program participant met the criteria of homeless under another federal statute
 - i. Third party- written only (letter or homeless certification)
 - b. Certification of no permanent housing during the preceding 60 days
 - i. HMIS service/stay record
 - ii. Written referral from another agency
 - iii. Third party-oral
 - iv. Self-certification
 - c. 2 or more moves during preceding 90 days
 - i. Self-certification supported by third party written, third party oral or due-diligence to obtain third party verification
 - d. Special needs or 2 or more employment barriers
 - i. Third party-written
 - ii. Written diagnosis from licensed professional
 - iii. Written intake observation from licensed professional confirming diagnosis with 45 days
 - iv. Employment records, corrections records or literacy/English proficiency test
 - v. Third party-oral (for employment barriers only)
4. Category 4- Fleeing/Attempting to Flee Domestic Violence (client must have no subsequent residence and lack of resources to obtain housing)
 - a. If victim service provider, self-certification signed by individual or oral statement recorded and signed by intake worker
 - b. If non-victim service provider, self-certification supported by third party DV provider referral or intake workers observation

Verification of Income for Rapid Re-housing and Homelessness Prevention

All sources of household income (including zero income households) for each household member age 18 or older, must be verified and documented. For people receiving Homelessness Prevention income must be determined at intake and gross household income must be below 30% of the area median income (AMI) for Macomb County as determined annually by the U.S. Department of Housing and Urban Development. Homelessness Prevention clients must have their income reevaluated not less than once every three months and their gross household income must be less than or equal to 30% of the AMI. Clients receiving Rapid Re-housing assistance do not need their income determined at intake. However, an income assessment must be done annually and gross household income must be less than or equal to 30% of the AMI. Income determinations must be prospective and anticipate any income that will be received during the upcoming 12-month period. For earned income, household must provide four (4) of their most recent, consecutive paystubs, if paid bi-weekly and eight (8) of their most recent, consecutive paystubs, if paid weekly.

The Part 5 method must be used to calculate income. It is strongly recommended that the CPD Income Calculator be used when determining income.

Part 5 guidance can be found at: https://www.hud.gov/sites/documents/DOC_35649.PDF

CPD Income Eligibility Calculator: <https://www.hudexchange.info/incomecalculator/>

VI. Program Support Information

Prioritization for Rapid Re-housing and Homelessness Prevention

The purpose of the Emergency Solution Grant is to provide housing assistance to as many people as funding allows. Subrecipients will focus on finding affordable, safe and sanitary housing for homeless populations. Homeless populations will not be denied or waitlisted for services because of prioritization. All eligible program participants will be assisted as funding allows.

Fair Market Rent and Rent Reasonableness for Rapid Re-housing and Homelessness Prevention

Program participants receiving Rapid Re-housing or Homelessness Prevention must meet both Fair Market Rent (FMR) and rent reasonableness requirements. If the gross rent (contract rent amount plus utility allowance) exceeds either the FMR or rent reasonableness standard, recipients are prohibited from using ESG funds for any portion of the rent, even if the household is willing and/or able to pay the difference. Rent reasonableness and FMR requirements do not apply when a program participant is receiving only financial assistance or services such as: rental application fees, security deposits, initial payment of last month's rent, utility payments/deposits, moving costs, housing search and placement, housing stability case management, mediation, legal services and credit repair. FMR and rent reasonableness compliance must be met before a check is prepared and approved for rental assistance.

Fair Market Rent* is determined by HUD and updated annually. Gross rent (contract rent amount plus utility allowance**) amounts cannot exceed FMR. When considering FMR, ESG subrecipients must examine the cost of rent plus the cost of utilities, that the tenant is responsible for paying. Utility costs can include: gas, electric, water, sewer and trash, Internet, television services and telephone are not counted toward utility costs. Rental calculations also do not include pet fees or late fees.

Rent reasonableness must be determined by the subrecipient. Rent reasonableness is determined by considering the location, quality, amenities, size, condition, type and age of the unit. Maintenance services and utilities paid by the owner/landlord should also be considered. The rent amount of similar units should be compared to the prospective unit. The "Rent Reasonableness Checklist and Certification" form must be used to compare three (3) units to the prospective rental unit.

Subrecipients can find comparable units through rental listing websites, newspaper advertisements, real estate agents, online postings, etc. Subrecipients should include print outs of advertisements, case notes or other forms of documentation in all client files. In order to be considered reasonable, rents must fall within \$100 of the average of the three comparable units. Another acceptable method of documentation is written verification signed by the property owner or management company, on letterhead, affirming that the rent amount charged is comparable to current rents charged for similar units managed by the same owner. In order for rents to be paid with ESG funds they must meet both FMR and rent reasonableness requirements.

*Fair Market Rents can be at <https://www.huduser.gov/portal/datasets/fmr.html>

**Utility allowance schedule for Region D (which includes Macomb County) is determined and updated annually by the Michigan State Housing Development Authority. Utility allowance schedules can be found at http://www.michigan.gov/mshda/0,4641,7-141-5555_8002_26576_26582-135005--00.html

ESG Assistance for Mobile Homes

ESG funds may assist participants who reside in mobile homes as long as the unit is securely attached to a stationary pad, i.e. tied down. The pad may be a poured basement, concrete slab on grade or must be securely anchored to the site. ESG funds can't be used for any unit that can be attached to a vehicle and readily moved from location-to-location. Units may be in a community setting or on private property.

Assistance may include lot rent costs if it's included in the lease. FMR amount plus lot rent should not be added together to determine FMR (Utilities would also need to be included in the FMR calculation). All other ESG requirements apply.

Rental Assistance Agreements & Leases

When providing rental assistance under Rapid Re-housing or Homelessness Prevention rental assistance agreements must be in place between the ESG subrecipient and owner and a lease agreement must be in place between the program participant and owner.

Rental assistance agreements and lease requirements are not required when a program participant is receiving only financial assistance or services such as: rental application fees, security deposits, last month's rent, utility payments/deposits, moving costs, housing search and placement, housing stability case management, mediation, legal services and credit repair.

All ESG subrecipients must ensure that the requirements under 24 CFR part 5, subpart L are included or incorporated into rental assistance agreements (Attachment #7). All new leases must include or incorporate the requirements under 24 CFR part 5, subpart L. Please see Attachment #4 for more specific program requirements.

Admission, Diversion, and Referral and Discharge by Emergency Shelters

ESG subrecipients will make every effort to provide emergency shelter to as many program participants as funding allows. Shelter stays should be avoided, if possible and limited to the shortest time necessary to help willing participants regain permanent housing. The subrecipient shall conduct an initial intake and assessment to determine the eligibility of each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing. These evaluations must be conducted in accordance with the centralized or coordinated assessment requirements set forth under 24 CFR 576.400(d) and the written standards established under 24 CFR 576.400(e). Initial evaluations should be completed on all individuals and families to determine if they should be admitted to emergency shelter, diverted to a provider of Rapid Re-housing or Homeless Prevention or referred to other mainstream resources.

Discharge from emergency shelter should be the last recourse of action and reserved for serious offenses. ESG subrecipients will follow their own written discharge policy.

ESG funds can be used to provide shelter needs of special populations (victims of domestic violence, dating violence, sexual assault and stalking) and individuals and families that have the highest barriers to housing and are likely to be homeless the longest. Confidentiality will be enforced to ensure the safety needs of special populations are met.

Involuntary family separation: Shelters that serve families must serve all eligible families and may not refuse services based on the age of children under age 18 (24 CFR 576.102).

Assessing, Prioritizing and Reassessing Needs for Emergency Shelter Essential Services

Assessment: Subrecipients must conduct an intake and assessment on each client to determine eligibility for assistance for Emergency Shelter essential services. Intake and assessment are standardized forms within the HMIS System, and a copy of these forms must be maintained electronically and a copy must be kept in the participant file. Domestic violence agencies may use an alternative, comparable system to HMIS.

Prioritization: The purpose of the Emergency Solution Grant is to provide assistance to as many people as funding allows. Homeless populations will not be denied or waitlisted for services because of prioritization. All eligible program participants will be assisted as funding allows.

Reassessing: ESG sub-recipients must also reassess emergency shelter program participants, on an ongoing basis, to determine the earliest possible time that they can be discharged to permanent housing and to ensure that only those individual or families with the greatest need receive ESG funded emergency shelter assistance.

Standards for Targeting and Providing Street Outreach Essential Services

Subrecipients will target unsheltered homeless individuals and families. Subrecipients must conduct an intake and assessment on each client to determine eligibility for Street Outreach assistance. Intake and assessment are standardized forms within the HMIS System, and a copy of these forms must be maintained in the participant file. Domestic violence agencies may use an alternative system. Qualifying clients will be provided the following as needed: engagement, case management, emergency health and mental health referrals, transportation, documentation, or other appropriate services specific to their needs. Clients will be referred to a Rapid Re-housing provider that can quickly assist the client to obtain safe, permanent housing.

Confidentiality

Client information collected under this agreement is private and the use or disclosure of such information, when not directly connected with the administration of the County's or subrecipient's responsibilities with respect to services provided, is prohibited without lawful court order unless written consent is obtained from such person receiving service and, in the case of a minor, that of a responsible parent/guardian. The subrecipient shall ensure the confidentiality of client data pertaining to the provision of family violence prevention or treatment services as listed in 24 CFR 576.500(x).

ESG subrecipients will maintain program participant confidentiality utilizing the following methods:

1. All program participant records containing personally identifying information must be kept in a secure location.
2. All program participants will sign consent forms and be informed of their rights regarding personal information.

3. When ESG subrecipients discuss program participants via email or any other form of electronic communication, they will not share participant's names. HMIS client identification numbers or an alternative system will be used instead.
4. The address or location of any domestic violence, dating violence, sexual assault or stalking shelter will not be made public, except with written authorization of the chief person operating the shelter.
5. The address or location of any housing of any program participant will not be made public, except as provided under preexisting privacy policy of the subrecipient and consistent with state and local laws regarding privacy and confidentiality.

Program Participant Termination – Formal Due Process (24 CFR 576.402)

Subrecipients terminating a program participant's ESG assistance for violating program requirements must provide a formal termination process that recognizes the rights of individuals affected. Subrecipients must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases. The formal process is only required after a participant has received assistance and is then terminated from receiving continued assistance. Program participants must have the opportunity to provide objection to termination either in writing or orally. Program participants must also be provided with written notification of final determination. Assistance to a program participant who has been terminated from the program may resume at a later date.

If a participant is deemed ineligible to receive ESG assistance, the subrecipient must document the reasons for denial and inform the applicant in writing of the denial.

Homeless Participation Requirements (24 CFR 576.405)

Subrecipients must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policy-making entity of the subrecipient, to the extent that the entity considers and makes policies and decisions regarding any facilities, services, or other assistance that receive funding under Emergency Solutions Grant (ESG). If the subrecipient is unable to meet this requirement, it must present the County with a plan to consult with homeless or formerly homeless individuals in considering and making policies and decisions regarding any facilities, services, or other assistance that receive funding under the ESG grant. The plan must be submitted to the County for approval prior to execution of the ESG grant agreement.

To the maximum extent practicable, the subrecipient must involve homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under ESG, in providing services assisted under ESG, and in providing services for occupants of facilities assisted under ESG. This involvement may include employment or volunteer services.

CFDA Number

The Catalog of Federal Domestic Assistance (CFDA) number for ESG is 14.231.

Insurance Coverage

All recipients of ESG funds must carry General Liability Insurance and Crime and Dishonesty Insurance. The recipients must maintain documentation of insurance coverage, including sub-recipients, with their Agency records.

Grant Management

ESG grants are reimbursement based. All grant funds must be spent on eligible costs prior to funds being requested from Macomb County Community Development.

Grant Amendments

Changes to the budget and/or grant term end date must be submitted in writing.

Either of the parties hereto may request amendments to any of the provisions of the agreement at any time but no amendment shall be made or performed until it has been mutually agreed to by the parties. All amendments shall be in writing and executed prior to any work being done pursuant thereto.

The County may, in its discretion, amend the agreement to conform with federal, state or local governmental guidelines, policies and available funding amounts, or for other reasons. If such amendments result in a change in the purpose, the scope of services, the location, or beneficiaries of the Project(s) to be undertaken as part of the agreement, such modifications will be incorporated only by written amendment signed by both County and subrecipient.

Payment Requests

Payment requests are to be submitted on the required Macomb County Community Development Service Voucher. Back-up documentation of costs must be submitted with the voucher. The dates that Service Vouchers must be submitted and the period covered by each voucher will be stated in the sub-recipients' contracts.

Match Requirements

ESG funds require a 100% match. Match Reports are required to be submitted with each service voucher. Documentation of the eligible match source and eligible expenditure must be submitted with each Match Report. The ESG program requires that all funds counted as match be contributed to the ESG program and expended on allowable ESG costs, and that all other ESG requirements (except for the expenditure limits in 24 CFR 576.100) be met (e.g., documentation requirements, eligibility requirements, and eligible costs).

The following match requirements must be met:

1. If the matching funds are from another federal program, there is no specific statutory prohibition on using those funds as match;
2. The matching funds are expended (that is, the allowable cost is incurred) after the date of the ESG grant agreement for the ESG funds being matched;
3. The matching funds are expended by the expenditure deadline that applies to the ESG funds being matched;
4. The matching funds have not been and will not be used to match any other Federal program's funds nor any other ESG grant;
5. The subrecipient does not use ESG funds to meet the other program's matching requirements; and
6. The subrecipient keeps records of the source and use of the matching funds, including the particular fiscal year ESG grant for which the matching contribution is counted.

A full description of matching requirements can be found at 24 CFR 576.201.

Fraud Procedures

When an agency finds or hears of fraudulent use of ESG funds, they are required to report the situation in writing to Macomb County Community Development who will, in turn, inform the local HUD office.

Quarterly Progress Reports

During the program year, the subrecipient shall prepare and submit to Macomb County Community Development every three months or when specifically requested, a Progress Reporting. The sub-

recipient must also submit a final Cumulative Report covering period program year. This report is due by the fifteenth day after the end of the program year.

VII. Conflicts of Interest

(a) Organizational conflicts of interest. The provision of any type or amount of ESG assistance may not be conditioned on an individual's or family's acceptance or occupancy of emergency shelter or housing owned by the recipient, the subrecipient, or a parent or subsidiary of the subrecipient. No subrecipient may, with respect to individuals or families occupying housing owned by the subrecipient, or any parent or subsidiary of the subrecipient, carry out the initial evaluation required under 24 CFR 576.401 or administer homelessness prevention assistance under 24 CFR 576.103.

(b) Individual conflicts of interest. For the procurement of goods and services, the recipient and its subrecipients must comply with the codes of conduct and conflict of interest requirements under 24 CFR 85.36 (for governments) and 24 CFR 84.42 (for private nonprofit organizations). For all other transactions and activities, the following restrictions apply:

(1) Conflicts prohibited. No person described in paragraph (b)(2) of this section who exercises or has exercised any functions or responsibilities with respect to activities assisted under the ESG program, or who is in a position to participate in a decision-making process or gain inside information with regard to activities assisted under the program, may obtain a financial interest or benefit from an assisted activity; have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity; or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has family or business ties, during his or her tenure or during the one-year period following his or her tenure.

(2) Persons covered. The conflict-of-interest provisions of paragraph (b)(1) of this section apply to any person who is an employee, agent, consultant, officer, or elected or appointed official of the recipient or its subrecipients.

(3) Exceptions. Upon the written request of the recipient, HUD may grant an exception to the provisions of this subsection on a case-by-case basis, taking into account the cumulative effects of the criteria in paragraph (b)(3)(ii) of this section, provided that the recipient has satisfactorily met the threshold requirements of paragraph (b)(3)(i) of this section.

(i) Threshold requirements. HUD will consider an exception only after the recipient has provided the following documentation:

(A) If the recipient or subrecipient is a government, disclosure of the nature of the conflict, accompanied by an assurance that there has been public disclosure of the conflict and a description of how the public disclosure was made; and

(B) An opinion of the recipient's attorney that the interest for which the exception is sought would not violate state or local law.

(ii) Factors to be considered for exceptions. In determining whether to grant a requested exception after the recipient has satisfactorily met the threshold requirements under paragraph (b)(3)(i) of this section, HUD must conclude that the exception will serve to further the purposes of the ESG program and the effective and efficient administration of the recipient's or subrecipient's program or project, taking into account the cumulative effect of the following factors, as applicable:

(A) Whether the exception would provide a significant cost benefit or an essential degree of expertise to the program or project that would otherwise not be available;

(B) Whether an opportunity was provided for open competitive bidding or negotiation;

(C) Whether the affected person has withdrawn from his or her functions, responsibilities or the decision-making process with respect to the specific activity in question;

(D) Whether the interest or benefit was present before the affected person was in the position described in paragraph (b)(1) of this section;

(E) Whether undue hardship results to the recipient, the subrecipient, or the person affected, when weighed against the public interest served by avoiding the prohibited conflict; and

(F) Any other relevant considerations.

(c) Contractors. All contractors of the recipient or subrecipient must comply with the same requirements that apply to subrecipients under this section.

VIII. Other Federal Requirements

Subrecipients must comply with the following other federal requirements: Fair Housing Act; Uniform Administrative Requirements; Nondiscrimination in Federally Assisted Programs; Age Discrimination Act; American's with Disabilities Act; Equal Employment Opportunity Programs; Minority Business Enterprise; Women's Business Enterprise; Drug Free Workplace; Debarred, Suspended, Ineligible Contractors; Affirmative Outreach; Section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act.

IX. Violence Against Women Policy

Please see Attachment #4 for Macomb County Community Development's Violence Against Women Act Policy and Emergency Transfer Plan.

X. Equal Access Policy

Please see Attachment #11 for Macomb County Community Development's Equal Access Policy in accordance with 24 CFR 5.106, "Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs".

Attachment #1
 ESG Rapid Re-Housing Policy
 Emergency Solutions Grant

RAPID RE-HOUSING (RRH)	
Eligibility	
<p>To receive ESG rapid re-housing assistance, an individual or family must demonstrate at initial evaluation that it is literally homeless (referred to as Category 1 in the Homeless Definition Final Rule). An individual or family is defined as "literally homeless" if (1) living in a public or private place not meant for human habitation, (2) living in a temporary shelter, which includes congregate shelters and transitional housing, or (3) exiting an institution where the individual or family has resided for 90 or fewer days and was living in shelter or in a place not meant for habitation before entering the institution. RRH assistance is also available to people fleeing or attempting to flee domestic violence (Category 4 in the Homeless Definition Final Rule) if they are also literally homeless (24 CFR part 576.104).</p> <p>Homeless service providers agree to only accept referrals from central intake and refer all households seeking assistance to central intake for assessment. Coordination among homeless service providers with central intake allows for consistent assessment and community targeting.</p>	
Need and Continued Eligibility	
<p>ESG recipients and subrecipients must conduct regular re-evaluations, at least annually, of program participants receiving RRH assistance. To continue to receive ESG assistance, a program participant's re-evaluation must demonstrate eligibility based on:</p> <ul style="list-style-type: none"> • Income. The program participant's household annual income must be less than or equal to <u>30% (AMI)</u>. • Lack of resources and support networks. The program participant's household must continue to lack sufficient resources and support networks to retain housing without ESG assistance. • Need. The recipient or subrecipient must determine the amount and type of assistance that the individual or family will need to (re)gain stability in permanent housing. 	
Financial Assistance Guidelines	
Type of Assistance	Guidance
Rental Arrearages	<ul style="list-style-type: none"> • Not to exceed three (3) months • Not to exceed \$2,000 per household • Any combination of three (3) types of rental assistance must not exceed twenty-four (24) months during any three year period
Rental Application Fees	<ul style="list-style-type: none"> • May pay for rental housing application fee
Short-Term Rental Assistance	<ul style="list-style-type: none"> • Not to exceed three (3) months • Not to exceed \$3,500 per household for this category. • Cannot be used with other subsidies • Any combination of three (3) types of rental assistance must not

	<ul style="list-style-type: none"> exceed twenty-four (24) months during any three (3) year period
Medium-Term Rental Assistance	<ul style="list-style-type: none"> Four (4) – Eight (8) months assistance Not to exceed \$7,500 per household per household for this category. Households are required to pay 30% of their gross monthly income or 10% of their net monthly income towards rent. Any combination of three (3) types of rental assistance must not exceed twenty-four (24) months during any three (3) year period
Security Deposit	<ul style="list-style-type: none"> Not to exceed 1.5 times the monthly rent not to exceed \$1,500
Last Month's Rent	<ul style="list-style-type: none"> May be paid at the time of first month's rent, if required to obtain rental unit (last month's rent takes the place of the security deposit – both security deposit and last month's rent can't be required) Cannot exceed one (1) month's rent Must be included in calculating total rental assistance which must not exceed twenty-four (24) months during any three (3) year period
Moving Costs	<ul style="list-style-type: none"> May be paid for cost of truck rental, hiring a moving company or temporary storage fees for up to three (3) months Payment for temporary storage fees in arrears is not eligible. Participant must be receiving assistance for services and not have moved into permanent housing to receive assistance with temporary storage fees
Utility Deposit	<ul style="list-style-type: none"> Eligible services include: gas, electric, water & sewer \$250 per service not to exceed \$1,000 One (1) time assistance limit for this category Proof of ability to make future payments required in order to receive utility assistance.
Utilities	<ul style="list-style-type: none"> Eligible services include: gas, electric, water & sewer Not to exceed \$2,000 per household Not to exceed twelve (12) months per household per service including six (6) months arrearages per service within any three (3) year period.
Case Management	<ul style="list-style-type: none"> Not to exceed thirty (30) days during the period the participant is seeking permanent housing and can't exceed twenty-four (24) months during the period the participant resides in the permanent housing
Rental Assistance Overview	
Housing Standards	<ul style="list-style-type: none"> Units must pass HUD Habitability Standards
Lead-Based Paint Requirements	<ul style="list-style-type: none"> A lead-based paint visual assessment, performed by an inspector trained in visual assessment for deteriorated paint surfaces in accordance with HUD standards is required when a child under the age of 6 will be residing in a unit that was constructed before 1978. Must comply with LBP Poisoning Prevention Act of 1973 and applicable regulations found at 24 CFR 35, Parts A, B, H, J, K, M and R.
Fair Market Rent (FMR)	<ul style="list-style-type: none"> Rental assistance may cover up to the FMR for a unit unless the program requires a household contribution towards monthly housing expenses. Please see ESG policies for a complete set of requirements.
Rent Reasonableness	<ul style="list-style-type: none"> Units must comply with County rent reasonableness standards. Please see ESG policies for a complete set of requirements.

Lease Requirements	<ul style="list-style-type: none"> • A written lease between the owner and the program participant is required for assistance. • The only exception to the written lease requirement is in the case of rental assistance provided solely for rental arrears.
Rental Assistance Agreement	<ul style="list-style-type: none"> • A rental assistance agreement between the sub-recipient and owner/property manager is required for assistance. The agreement must comply with 24 CFR 576.106, Part E.

*The limits of assistance apply to the total assistance an individual receives either as an individual or as part of a family.

Attachment #2

ESG Homelessness Prevention Policy
Emergency Solutions Grant (ESG) Program

HOMELESS PREVENTION (HP)
Eligibility
<p>To receive ESG homeless prevention assistance, an individual or family must demonstrate at initial evaluation that it is homeless (categories 2, 3 and 4) or at-risk of homelessness (categories 1, 2 and 3). Please see 24 CFR 576.2 for definitions.</p> <p>Homeless service providers agree to only accept referrals from central intake and refer all households seeking assistance to central intake for assessment. Coordination among homeless service providers with central intake allows for consistent assessment and community targeting.</p>
Determining Eligibility
<p>ESG recipients and subrecipients must conduct initial evaluations for all households. To receive ESG assistance, a program participant's initial evaluation must demonstrate eligibility based on:</p> <ul style="list-style-type: none">• Income. The program participant's household annual income must be below <u>30% (AMI)</u>.• Lack of resources and support networks. The program participant's household must lack sufficient resources and support networks that would prevent them from moving into an emergency shelter, living in a place not meant for human habitation or other places described in Category 1 of the homeless definition.• Need. The recipient or subrecipient must determine the amount and type of assistance that the individual or family will need for housing stability or to remain in permanent housing.
Need and Continued Eligibility
<p>ESG recipients and subrecipients must conduct regular re-evaluations, at least every 3 months, of program participants receiving HP assistance. To continue to receive ESG assistance, a program participant's re-evaluation must demonstrate eligibility based on:</p> <ul style="list-style-type: none">• Income. The program participant's household annual income must be less than or equal to <u>30% (AMI)</u>.• Lack of resources and support networks. The program participant's household must continue to lack sufficient resources and support networks to retain housing without ESG assistance.• Need. The recipient or subrecipient must determine the amount and type of assistance that the individual or family will need for housing stability or to remain in permanent housing.
Financial Assistance Guidelines

Type of Assistance	Guidance
Rental Arrearages	<ul style="list-style-type: none"> • Not to exceed three (3) months • Not to exceed \$2,000 per household • Any combination of three (3) types of rental assistance must not exceed twenty-four (24) months during any three year period
Rental Application Fees	<ul style="list-style-type: none"> • May pay for rental housing application fee
Short-Term Rental Assistance	<ul style="list-style-type: none"> • Not to exceed three (3) months • Not to exceed \$3,500 per household for this category • Cannot be used with other subsidies • Any combination of three (3) types of rental assistance must not exceed twenty-four (24) months during any three (3) year period
Medium-Term Rental Assistance	<ul style="list-style-type: none"> • Four (4) – Eight (8) months assistance • Not to exceed \$7,500 per household per household for this category • Households are required to pay 30% of their gross monthly income or 10% of their net monthly income towards rent. • Any combination of three (3) types of rental assistance must not exceed twenty-four (24) months during any three (3) year period
Security Deposit	<ul style="list-style-type: none"> • Not to exceed 1.5 times the monthly rent not to exceed \$1,500
Last Month's Rent	<ul style="list-style-type: none"> • May be paid at the time of first month's rent, if required to obtain rental unit (last month's rent takes the place of the security deposit – both security deposit and last month's rent can't be required) • Cannot exceed one (1) month's rent • Must be included in calculating total rental assistance which must not exceed twenty-four (24) months during any three (3) year period
Moving Costs	<ul style="list-style-type: none"> • May be paid for cost of truck rental, hiring a moving company or temporary storage fees for up to three (3) months • Payment for temporary storage fees in arrears is not eligible. Participant must be receiving assistance for services and not have moved into permanent housing to receive assistance with temporary storage fees
Utility Deposit	<ul style="list-style-type: none"> • Eligible services include: gas, electric, water & sewer • \$250 per service not to exceed \$1,000 • One (1) time assistance limit for this category
Utilities	<ul style="list-style-type: none"> • Eligible services include: gas, electric, water & sewer • Not to exceed \$2,000 per household • Not to exceed twelve (12) months per household per service including six (6) months arrearages per service within any three (3) year period.
Case Management	<ul style="list-style-type: none"> • Not to exceed thirty (30) days during the period the participant is seeking permanent housing and can't exceed twenty-four (24) months during the period the participant resides in the permanent housing
Rental Assistance Overview	
Housing Standards	<ul style="list-style-type: none"> • Units must pass HUD Habitability Standards.
Lead-Based Paint Requirements	<ul style="list-style-type: none"> • A lead-based paint visual assessment, performed by an inspector trained in visual assessment for deteriorated paint surfaces in accordance with HUD standards is required when a child under the age of 6 will be residing in a unit that was constructed before 1978. • Must comply with LBP Poisoning Prevention Act of 1973 and applicable regulations found at 24 CFR 35, Parts A, B, H, J, K, M and R.

Fair Market Rent (FMR)	<ul style="list-style-type: none"> Rental assistance may cover up to the FMR for a unit unless the program requires a household contribution towards monthly housing expenses. Please see County ESG policies for a complete set of requirements.
Rent Reasonableness	<ul style="list-style-type: none"> Units must comply with County rent reasonableness standards. Please see ESG policies for a complete set of requirements.
Lease Requirements	<ul style="list-style-type: none"> A written lease between the owner and the program participant is required for assistance. The only exception to the written lease requirement is in the case of rental assistance provided solely for rental arrears.
Rental Assistance Agreement	<ul style="list-style-type: none"> A rental assistance agreement between the subrecipient and owner/property manager is required for assistance. The agreement must comply with 24 CFR 576.106, Part E.

*The limits of assistance apply to the total assistance an individual receives either as an individual or as part of a family.

Attachment #3

ESG HMIS Component Policy

Emergency Solutions Grant (ESG) Program

The HMIS component of the ESG program is targeted to the HMIS Lead Agency for the Macomb County CoC, but under certain circumstances funding may be allocated to another agency. The HMIS component is used to pay the costs of contributing data to the CoC's HMIS.

HMIS Eligible Costs (24 CFR 576.107)

- Purchasing or leasing computer hardware;
- Purchasing software or software licenses;
- Purchasing or leasing equipment, including telephones, fax machines, and furniture;
- Obtaining technical support;
- Paying salaries for operating HMIS, including:
 - Completing data entry;
 - Monitoring and reviewing data quality;
 - Completing data analysis;
 - Reporting to the HMIS Lead;
 - Training staff on using HMIS or comparable database;
 - Implementing and complying with HMIS requirements.
- Paying costs of staff to travel to and attend HUD-sponsored and HUD-approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act*
- Paying staff travel costs to conduct intake
- Paying participation fees charged by the HMIS Lead, if the subrecipient is not the HMIS Lead.

If the subrecipient is the HMIS Lead Agency, as designated by the Continuum of Care (CoC), it may also use ESG funds to pay the costs of:

- Hosting and maintaining HMIS software or data;
- Backing up, recovering, or repairing HMIS software or data;
- Upgrading, customizing and enhancing the HMIS;
- Integrating and warehousing data, including development of a data warehousing for use in aggregating data from providers using multiple software systems;
- Reporting to providers, the CoC and HUD;
- Conducting training on using the system or a comparable database, including traveling to training.

If the subrecipient is a victim services provider, it may use ESG funds to establish and operate a comparable database that collects client-level data over time and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into or provided to an HMIS.

Activities funded under this section must comply with HUD's standards on participation, data collection, and reporting under a local HMIS.

*Travel costs may include registration fees, lodging, transportation and mileage. Costs need to be reasonable and appropriate. Subrecipients must submit copies of receipts, proof of attendance and copy of the training/conference agenda in order to get reimbursed for travel costs.

Attachment #4

Macomb County

Macomb Community Action – Community Development

Violence Against Women Policy and Emergency Transfer Plan

Background

The 2013 reauthorization of the Violence Against Women Act (VAWA) expands housing protection to all of the Department of Housing and Urban Development's (HUD) housing programs, as well as provides enhanced protections and options for victims of domestic violence, dating violence, sexual assault and stalking. HUD is the Federal agency that oversees that Macomb County is in compliance with VAWA.

This policy and plan identifies VAWA protections and limitations, tenants who are eligible for an emergency transfer, documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur and guidance to tenants on safety and security. This emergency transfer plan is based on a model published by HUD.

HUD prohibits denying assistance to program applicants and program participants because they have experienced or are experiencing domestic violence, dating violence, sexual assault or stalking. Similarly, HUD prohibits terminating program participants because they have experienced or are experiencing domestic violence, dating violence, sexual assault or stalking. Additionally, HUD funded program participants cannot be evicted from housing because that have experienced or are experiencing domestic violence, dating violence, sexual assault, or stalking.

Applicability

This policy and plan applies to all Emergency Solutions Grant (ESG) rental assistance programs with a commitment date on or after December 16, 2016.

Emergency Shelters (24 CFR 576.409)

Emergency shelters funded under ESG cannot deny admission or remove any individual or family from the emergency shelter on the basis or as a direct result of the fact that the individual or family is or has been a victim of domestic violence, dating violence, sexual assault or stalking, if the individual or family otherwise qualifies for admission or occupancy.

Notice to Applicants and Tenants (24 CFR 5.2005)

All County subrecipients must provide each of its applicants and tenants with the Notice of Occupancy Rights (Attachment #5) and the Certification Form (Attachment #7). The Certification Form is to be completed by a tenant in an instance of domestic violence, dating violence, sexual assault or stalking. Subrecipients must document that clients were informed of their rights and provided copies of the notices. A signed copy of acknowledgement (Attachment #8) must be maintained in client files.

County subrecipients must provide the Notice of Occupancy Rights to an applicant at each of the following times:

1. At the time the applicant is denied assistance or admission under a covered housing program;

2. At the time the individual is provided assistance or admission under a covered housing program;
3. With any notification of eviction or notification of termination of assistance; and
4. At the time of annual recertification or lease renewal, or if there will not be recertification or lease renewal for a tenant during the 12-month period, through other means.

If needed, the Notice of Occupancy Rights and the Certification Form shall be made available in multiple languages, consistent with guidance issued by HUD in accordance with Executive Order 13166 (Improving Access to Services with Persons with Limited English Proficiency).

Rental Agreements and Leases (24 CFR 576.409)

All ESG subrecipients must ensure that the requirements under 24 CFR part 5, subpart L are included or incorporated into rental assistance agreements (Attachment #9).

All new leases must include or incorporate the requirements under 24 CFR part 5, subpart L. All current leases, signed on or after December 16, 2016 should have a VAWA lease addendum (Attachment #10) incorporating the requirements of 24 CFR part 5, Subpart L. The lease addendum should allow the tenants to terminate their lease without penalty if the conditions for an emergency transfer are met. The housing provider (property owner) must notify the County subrecipient before bifurcating the lease or providing notification of eviction to the tenant.

Construction of Lease Terms and Terms of Assistance (24 CFR 5.2005)

An incident of actual or threatened domestic violence, dating violence, sexual assault, or stalking should NOT be construed as:

1. A serious or repeated violation of a lease executed under a covered housing program by the victim of threatened victim of such incident; or
2. Good cause for terminating the assistance, tenancy, or occupancy rights under a covered housing program of the victim or threatened victim of such incident.

Documenting Domestic Violence, Dating Violence, Sexual Assault or Stalking (24 CFR 5.2007)

If an applicant or tenant, expresses that they are victim of domestic violence, dating violence, sexual assault or stalking, entitled to the protections or remedies offered under VAWA, the housing provider (County subrecipient) may request, in writing, that the applicant submit documentation. If a tenant expresses that they are victim of domestic violence, dating violence, sexual assault or stalking to the property owner, the property owner must notify the County subrecipient. The County subrecipient will be responsible for determining whether the tenant is entitled to protections offered under VAWA and is responsible for obtaining all required documentation. The documentation can include:

1. A copy of the signed Certification Form; or
2. A document:
 - a. Signed by an employee or agent of a victim services provider, an attorney, medical professional, or a mental health professional from whom the victim has sought assistance related to domestic violence, dating violence, sexual assault or stalking, or the effects of the abuse; signed by the applicant/tenant; and

- b. That specifies, under perjury of law, that the professional believes in the occurrence of the incident, that is grounds for the protections and remedies offered under the Violence Against Women Act and that the incident meets the applicable definition of domestic violence, dating violence, sexual assault or stalking under 24 CFR 5.2003; or
3. A record of a federal, state or local law enforcement agency, court, or administrative agency; or
4. At the discretion of the housing provider, a statement or other evidence provided by the applicant/tenant.

If the housing provider (County subrecipient) receives documentation that contains conflicting information, the housing provider may require the applicant/tenant to submit third-party verification within thirty (30) calendar days of the date of the request for the documentation.

If the applicant/tenant is entitled to protections under VAWA it is the County subrecipient's responsibility to notify the applicant/tenant of their eligibility determination and to notify the property owner in writing that the program participant is entitled to protections under VAWA and work with the property owner on the participant's behalf.

If an applicant/tenant does not provide the requested documentation within 14 business days after the date that the tenant received the request in writing, nothing in the regulations may be construed to limit the authority of the housing provider to:

1. Deny admission to the applicant/tenant to the program;
2. Deny assistance;
3. Terminate the participation of the tenant in the program;
4. Evict the tenant, or lawful occupant that commits a violation of the lease.

A housing provider may extend the 14 business day deadline to allow a tenant more time to submit documentation.

Prohibited Basis for Denial of Termination of Assistance or Eviction (24 CFR 5.2005)

An applicant for assistance or tenant assisted under a covered housing program may not be denied admission to, denied assistance under, terminated from participation in, or evicted from housing on the basis or as direct result of the fact that the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if the applicant or tenant otherwise qualifies for admission, assistance, participation or occupancy.

A tenant in a covered housing program may not be denied tenancy or occupancy rights solely based on criminal activity directly relating to domestic violence, dating violence, sexual assault or stalking if:

1. The criminal activity is engaged in by a member of the household of the tenant or any guest or other person under the control of the tenant; and
2. The tenant or an affiliated¹ individual of the tenant is the victim or threatened victim of such domestic violence, dating violence, sexual assault or stalking.

¹ Affiliated individual, with respect to an individual, means: A spouse, parent, brother, sister, or child of that individual, or a person to whom that individual stands in the place of a parent or guardian (for example, the

Limitations of VAWA (24 CFR 5.2005)

Nothing in this policy limits the authority of a covered housing provider (property owner) to comply with a court order with respect to the rights or access or control of property, including civil protection orders or the distribution or possession of property.

This policy also does not limit a covered housing provider's (property owner/County subrecipient) authority to evict or terminate assistance to a tenant for any violation not premised on an act of domestic violence, dating violence, sexual assault, or stalking. Additionally, this does not limit the ability of a covered housing provider (property owner/County subrecipient) to evict or terminate assistance if the provider can demonstrate an actual and imminent threat² to other tenants or those employed at or those providing service to the property. However, the covered housing provider (property owner/County subrecipient) must not subject the tenant who has been a victim or is affiliated with an individual who is or has been a victim of domestic violence, dating violence, sexual assault or stalking to a more demanding standard than other tenants in determining whether to evict or terminate assistance.

Any eviction or termination of assistance should only be utilized when there are no other actions that could be taken to reduce or limit the threat, including, but not limited to, transferring the victim to a different unit, barring the perpetrator from the property, contacting law enforcement to increase police presence or develop other plans to keep the property safe, or seeking other legal remedies to prevent the perpetrator from acting on a threat. Restriction predicated on public safety cannot be based stereotypes, but must be tailored to particularized concerns about individual residents.

Emergency Transfer Plan (24 CFR 5.2005)

Macomb County is concerned about the safety of tenants assisted with Macomb County Emergency Solutions Grant funds, and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA),³ Tenants who are victims of domestic violence, dating violence, sexual assault, or stalking are allowed to request an emergency transfer from the tenant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.⁴ The ability to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether another dwelling unit is available and is safe to offer the tenant for temporary or more permanent occupancy.

Eligibility for Emergency Transfers (24 CFR 5.2005)

affiliated individual is a person in the care, custody, or control of that individual); or any individual, tenant, or lawful occupant living in the household of that individual (24 CFR 5.2003).

² Actual and imminent threat refers to a physical danger that is real, would occur within an immediate time frame, and could result in death or serious bodily harm. In determining whether an individual would pose an actual and imminent, the factors to be considered include: The duration of the risk, the nature and severity of the potential harm, the likelihood that the potential harm will occur, and the length of time before the potential harm would occur (24 CFR 5.2003).

³ Despite the name of this law, VAWA protection is available to all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

⁴ Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer, if: the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.

A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan.

Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

To the extent permitted, tenants requesting an emergency transfer shall have priority over other tenants seeking transfers and individuals seeking placement on waiting lists.

Note: According to HUD's regulation 24 CFR part 5, subpart L, a person is considered a victim under the following definitions:

Dating violence means violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where the existence of such a relationship shall be determined based on a consideration of the following factors:

1. The length of the relationship;
2. The type of relationship; and
3. The frequency of interaction between the persons involved in the relationship.

Domestic violence includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction. The term "spouse or intimate partner of the victim" includes a person who is or has been in a social relationship of a romantic or intimate nature with the victim, as determined by the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship.

Sexual assault means any nonconsensual sexual act proscribed by Federal, tribal, or State law, including when the victim lacks capacity to consent.

Stalking means engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

1. Fear for the person's individual safety or the safety of others; or
2. Suffer substantial emotional distress.

Emergency Transfer Request Documentation (24 CFR 5.2007)

To request an emergency transfer, the tenant shall notify and submit a written request for a transfer to the property owner. The property owner shall immediately notify the Macomb County subrecipient of

all requests covered by this plan. The property owner and subrecipient will provide reasonable accommodations to this policy for individuals with disabilities. The tenant's written request for an emergency transfer should include either:

1. A statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant were to remain in the same dwelling unit assisted with ESG funds; OR
2. A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the tenant's request for an emergency transfer; and
3. Certification of Domestic Violence, Dating Violence, Sexual Assault or Stalking.

Confidentiality (24 CFR 5.2007)

Macomb County and all housing providers will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the tenant. This also includes keeping confidential the fact that an individual is a victim of domestic violence, dating violence, sexual assault or stalking.

Macomb County and all housing providers shall not allow any individual administering assistance on behalf of the entity, or any persons within their employ to have access to the confidential information unless explicitly authorized for reasons that call for such individuals to have access to this information under applicable federal, state and local laws.

Neither Macomb County nor its housing providers shall enter confidential information into any shared database or disclose such information to any other entity or individual, except to the extent the disclosure fits one of the following three exceptions:

1. Requested or consented to in writing by the individual in a time-limited release
2. Required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program; or
3. Otherwise required by applicable law.

See the Notice of Occupancy Rights under the Violence Against Women Act for more information about the responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

Emergency Transfer Timing and Availability (24 CFR 5.2005)

There is no guarantee that a transfer request will be approved or how long it will take to process a transfer request. However, the County subrecipient will be required to act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. The subrecipient may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If a housing provider (property owner) has a safe unit immediately available, the housing provider must allow the tenant to make an internal emergency transfer. An internal emergency transfer is an emergency relocation of a tenant to another unit where the tenant would not be categorized as a new applicant; the tenant may reside in the new unit without having to undergo an application process. A safe unit is a unit that the tenant requesting the transfer believes is safe. Housing providers must ensure that any additional priority measures that are provided to other types of emergency transfers are also provided to emergency transfers covered under this plan.

If a housing provider (property owner) has no safe units, available, the housing provider shall give the tenant priority above all others when the next unit becomes available. The housing provider shall also notify the County subrecipient that no internal emergency transfer is available.

If a housing provider (property owner) has no safe units available for which a tenant who needs an emergency transfer is eligible, the County subrecipient will assist the tenant in an external emergency transfer by identifying other housing providers. At the tenant's request, the subrecipient will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking. An external emergency transfer is an emergency relocation of a tenant to another unit where the tenant would be categorized as a new applicant; the tenant must undergo an application process in order to reside in the new unit.

Tenants can seek both an internal and external emergency transfer concurrently if no safe unit is immediately available.

If a tenant receives an external emergency transfer, assistance will continue to be provided, including additional funding for a new security deposit and first month's rent (if required). Program requirements will still apply to type, amounts and limits of assistance.

If a tenant receiving ESG tenant-based rental assistance terminates their lease due to an emergency transfer, any remaining or returning security deposit, first month's rent, etc. must be paid directly to the County subrecipient. The funds will be reused to help other program participants.

If a household receives tenant-based rental assistance and must separate because of an emergency transfer then the non-transferring family members can stay in the unit and continue to receive assistance. A new lease must be signed and the non-transferring family members will only be eligible for the remaining terms of the original assistance. No additional months of assistance will be provided.

Lease Bifurcation (24 CFR 5.2009) (24 CFR 576.409)

Housing providers (property owners) may choose to bifurcate the lease or remove a household member from a lease in order to evict, remove or terminate assistance to a household member who engages in criminal activity directly related to domestic violence, dating violence, sexual assault or stalking. This may be done without:

1. Regard to whether the household member is a signatory to the lease; and
2. Evicting, removing, terminating assistance to, or otherwise penalizing a victim of such criminal activity who is also a tenant or lawful occupant.

The property owner must notify the County subrecipient before performing a lease bifurcation.

The property owner or County subrecipient can request documentation or certification of incidences of domestic violence, dating violence, sexual assault or stalking before granting a lease bifurcation.

Lease bifurcation shall be carried out in accordance with any requirements or procedures required by federal, state or local law for termination of assistance or leases and in accordance with any requirements relevant under the applicable funding program.

When a family receiving tenant-based rental assistance separates because of a lease bifurcation, the tenant-based rental assistance and utility assistance, if any, shall continue for the family members who are not evicted or removed. The remaining family members are only eligible for the remaining terms of the original assistance. No additional months of assistance will be provided.

Record Retention (24 CFR 5.2005)

Macomb County and its subrecipients will keep a record of all emergency transfers requested under its emergency transfer plan, and the outcomes of such requests, and retain these records for a period of three years. Macomb County and all subrecipients shall report this data as required by HUD.

Safety and Security of Tenants

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe. Clients should be connected to a Victims Service Provider to help the survivor navigate appropriate steps toward safety.

Tenants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Tenants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE, or visit the online hotline at <https://ohl.rainn.org/online/>.

Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

For local assistance regarding domestic violence or sexual assault, you may contact Turning Point's 24-hour crisis line at 586-463-6990. Turning Point provides Macomb County and the surrounding area with shelter and services to help victims of domestic violence and sexual assault.

Attachment #5

Macomb County

Macomb Community Action – Community Development

Notice of Occupancy Rights under the Violence Against Women Act

To all Tenants and Applicants

The Violence Against Women Act (VAWA) provides protections for victims of domestic violence, dating violence, sexual assault, or stalking. VAWA protections are not only available to women, but are available equally to all individuals regardless of sex, gender identity, or sexual orientation.⁵ The U.S. Department of Housing and Urban Development (HUD) is the Federal agency that oversees that Macomb County is in compliance with VAWA. This notice explains your rights under VAWA. A HUD-approved certification form is attached to this notice. You can fill out this form to show that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking, and that you wish to use your rights under VAWA."

Protections for Applicants

If you otherwise qualify for assistance under a Macomb County Emergency Solutions Grant (ESG) funded program or HOME assisted program, you cannot be denied admission or denied assistance because you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

Protections for Tenants

If you are receiving assistance under a Macomb County Emergency Solutions Grant funded program or HOME assisted program, you may not be denied assistance, terminated from participation, or be evicted from your rental housing because you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

Also, if you or an affiliated individual of yours is or has been the victim of domestic violence, dating violence, sexual assault, or stalking by a member of your household or any guest, you may not be denied rental assistance or occupancy rights under a Macomb County Emergency Solutions Grant funded program or HOME assisted program solely on the basis of criminal activity directly relating to that domestic violence, dating violence, sexual assault, or stalking.

Affiliated individual means your spouse, parent, brother, sister, or child, or a person to whom you stand in the place of a parent or guardian (for example, the affiliated individual is in your care, custody, or control); or any individual, tenant, or lawful occupant living in your household.

Removing the Abuser or Perpetrator from the Household

The housing provider (property owner/County subrecipient) may divide (bifurcate) your lease in order to evict the individual or terminate the assistance of the individual who has engaged in criminal activity (the abuser or perpetrator) directly relating to domestic violence, dating violence, sexual assault, or stalking.

⁵ Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

If the housing provider (property owner) chooses to remove the abuser or perpetrator, the housing provider may not take away the rights of eligible tenants to the unit or otherwise punish the remaining tenants. If the evicted abuser or perpetrator was the sole tenant to have established eligibility for assistance under the program, the housing provider must allow the tenant who is or has been a victim and other household members to remain in the unit for a period of time, in order to establish eligibility under the program or under another HUD housing program covered by VAWA, or, find alternative housing. If the other household members do not qualify under the housing program, alternative housing must be located.

In removing the abuser or perpetrator from the household, the housing provider (property owner) must follow Federal, State, and local eviction procedures. In order to divide a lease, the housing provider may, but is not required to, ask you for documentation or certification of the incidences of domestic violence, dating violence, sexual assault, or stalking.

Macomb County's Emergency Transfer Plan provides further information on the program guidelines for lease bifurcation.

Moving to Another Unit

Upon your request, the housing provider (property owner/County subrecipient) may permit you to move to another unit, subject to the availability of other units, and still keep your assistance. In order to approve a request, the housing provider (County subrecipient) may ask you to provide documentation that you are requesting to move because of an incidence of domestic violence, dating violence, sexual assault, or stalking. If the request is a request for emergency transfer, the housing provider (County subrecipient) may ask you to submit a written request or fill out a form where you certify that you meet the criteria for an emergency transfer under VAWA. The criteria are:

(1) You are a victim of domestic violence, dating violence, sexual assault, or stalking. If your housing provider does not already have documentation that you are a victim of domestic violence, dating violence, sexual assault, or stalking, your housing provider may ask you for such documentation, as described in the documentation section below.

(2) You expressly request the emergency transfer. Your housing provider may choose to require that you submit a form, or may accept another written or oral request.

(3) You reasonably believe you are threatened with imminent harm from further violence if you remain in your current unit. This means you have a reason to fear that if you do not receive a transfer you would suffer violence in the very near future.

OR

You are a victim of sexual assault and the assault occurred on the premises during the 90-calendar-day period before you request a transfer. If you are a victim of sexual assault, then in addition to qualifying for an emergency transfer because you reasonably believe you are threatened with imminent harm from further violence if you remain in your unit, you may qualify for an emergency transfer if the sexual assault occurred on the premises of the property from which you are seeking your transfer, and that assault happened within the 90-calendar-day period before you expressly request the transfer.

The County, all subrecipients and property owners will keep confidential requests for emergency transfers by victims of domestic violence, dating violence, sexual assault, or stalking, and the location of any move by such victims and their families.

Macomb County's Emergency Transfer Plan provides further information on the program guidelines for emergency transfers, and the housing provider (County subrecipient) must make a copy of its emergency transfer plan available to you if you ask to see it.

Documenting You Are or Have Been a Victim of Domestic Violence, Dating Violence, Sexual Assault or Stalking

The housing provider (County subrecipient) can, but is not required to, ask you to provide documentation to "certify" that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking. Such request from the housing provider must be in writing, and the housing provider must give you at least 14 business days (Saturdays, Sundays, and Federal holidays do not count) from the day you receive the request to provide the documentation. The housing provider may, but does not have to, extend the deadline for the submission of documentation upon your request.

You can provide one of the following to the housing provider as documentation. It is your choice which of the following to submit if the housing provider asks you to provide documentation that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

A complete HUD-approved certification form given to you by the housing provider with this notice, that documents an incident of domestic violence, dating violence, sexual assault, or stalking. The form will ask for your name, the date, time, and location of the incident of domestic violence, dating violence, sexual assault, or stalking, and a description of the incident. The certification form provides for including the name of the abuser or perpetrator if the name of the abuser or perpetrator is known and is safe to provide.

A record of a Federal, State, tribal, territorial, or local law enforcement agency, court, or administrative agency that documents the incident of domestic violence, dating violence, sexual assault, or stalking. Examples of such records include police reports, protective orders, and restraining orders, among others.

- A statement, which you must sign, along with the signature of an employee, agent, or volunteer of a victim service provider, an attorney, a medical professional or a mental health professional (collectively, "professional") from whom you sought assistance in addressing domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse, and with the professional selected by you attesting under penalty of perjury that he or she believes that the incident or incidents of domestic violence, dating violence, sexual assault, or stalking are grounds for protection.

Any other statement or evidence that the housing provider has agreed to accept.

If you fail or refuse to provide one of these documents within the 14 business days, the housing provider does not have to provide you with the protections contained in this notice.

If the housing provider (County subrecipient) receives conflicting evidence that an incident of domestic violence, dating violence, sexual assault, or stalking has been committed (such as certification forms from two or more members of a household each claiming to be a victim and naming one or more of the other petitioning household members as the abuser or perpetrator), the housing provider has the right to request that you provide third-party documentation within thirty 30 calendar days in order to resolve the conflict. If you fail or refuse to provide third-party documentation where there is conflicting evidence, the housing provider does not have to provide you with the protections contained in this notice.

Confidentiality

The County, all subrecipients and property owners must keep confidential any information you provide related to the exercise of your rights under VAWA, including the fact that you are exercising your rights under VAWA.

The County, all subrecipients and property owners must not allow any individual administering assistance or other services on behalf of the housing provider (for example, employees and

contractors) to have access to confidential information unless for reasons that specifically call for these individuals to have access to this information under applicable Federal, State, or local law.

The County, all subrecipients and property owners must not enter your information into any shared database or disclose your information to any other entity or individual. However, they may disclose the information provided if:

- You give written permission to the housing provider to release the information on a time limited basis.
- The housing provider needs to use the information in an eviction or termination proceeding, such as to evict your abuser or perpetrator or terminate your abuser or perpetrator from assistance under this program.
- A law requires the housing provider/landlord to release the information.

VAWA does not limit the housing provider's (property owner) duty to honor court orders about access to or control of the property. This includes orders issued to protect a victim and orders dividing property among household members in cases where a family breaks up.

Reasons a Tenant Eligible for Occupancy Rights under VAWA May Be Evicted or Assistance May Be Terminated

You can be evicted and your assistance can be terminated for serious or repeated lease violations that are not related to domestic violence, dating violence, sexual assault, or stalking committed against you. However, the housing provider (County subrecipient/property owner) cannot hold tenants who have been victims of domestic violence, dating violence, sexual assault, or stalking to a more demanding set of rules than it applies to tenants who have not been victims of domestic violence, dating violence, sexual assault, or stalking.

The protections described in this notice might not apply, and you could be evicted and your assistance terminated, if the housing provider (County subrecipient/property owner) can demonstrate that not evicting you or terminating your assistance would present a real physical danger that:

- 1) Would occur within an immediate time frame, and
- 2) Could result in death or serious bodily harm to other tenants or those who work on the property.

If the housing provider can demonstrate the above, the housing provider should only terminate your assistance or evict you if there are no other actions that could be taken to reduce or eliminate the threat.

Other Laws

VAWA does not replace any Federal, State, or local law that provides greater protection for victims of domestic violence, dating violence, sexual assault, or stalking. You may be entitled to additional housing protections for victims of domestic violence, dating violence, sexual assault, or stalking under other Federal laws, as well as under State and local laws.

Non-Compliance with the Requirements of This Notice

You may report a covered housing provider's violations of these rights and seek additional assistance, if needed, by contacting or filing a complaint with the Department of Housing and Urban Development Detroit Field Office. The Detroit Field Office can be contacted at 313-226-5611.

For Additional Information

You may view a copy of HUD's final VAWA rule at: <https://www.hud.gov/sites/documents/5720-F-03VAWAFINRULE.PDF>

Additionally, the housing provider must make a copy of HUD's VAWA regulations available to you if you ask to see them.

For questions regarding VAWA, please contact Macomb Community Action – Community Development at 586-466-6256.

For help regarding an abusive relationship, you may call the National Domestic Violence Hotline at 1-800-799-7233 or, for persons with hearing impairments, 1-800-787-3224 (TTY).

You may also locally contact Turning Point's 24-hour crisis line at 586-463-6990. Turning Point provides Macomb County and the surrounding area with services to help victims of domestic violence and sexual assault.

For tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

For help regarding sexual assault, you may contact **Turning Point's 24-hour crisis line** at 586-463-6990.

Victims of stalking seeking help may contact **Turning Point's 24-hour crisis line** at 586-463-6990.

Attachment: Certification form HUD-5382

Attachment #6

EMERGENCY TRANSFER
REQUEST FOR CERTAIN
VICTIMS OF DOMESTIC
VIOLENCE, DATING VIOLENCE,
SEXUAL ASSAULT, OR STALKING

U.S. Department of Housing
and Urban Development

OMB Approval No. 2577-0286
Exp. 06/30/2017

Purpose of Form: If you are a victim of domestic violence, dating violence, sexual assault, or stalking, and you are seeking an emergency transfer, you may use this form to request an emergency transfer and certify that you meet the requirements of eligibility for an emergency transfer under the Violence Against Women Act (VAWA). Although the statutory name references women, VAWA rights and protections apply to all victims of domestic violence, dating violence, sexual assault or stalking. Using this form does not necessarily mean that you will receive an emergency transfer. See your housing provider's emergency transfer plan for more information about the availability of emergency transfers.

The requirements you must meet are:

- (1) You are a victim of domestic violence, dating violence, sexual assault, or stalking. If your housing provider does not already have documentation that you are a victim of domestic violence, dating violence, sexual assault, or stalking, your housing provider may ask you for such documentation. In response, you may submit Form HUD-5382, or any one of the other types of documentation listed on that Form.
- (2) You expressly request the emergency transfer. Submission of this form confirms that you have expressly requested a transfer. Your housing provider may choose to require that you submit this form, or may accept another written or oral request. Please see your housing provider's emergency transfer plan for more details.
- (3) You reasonably believe you are threatened with imminent harm from further violence if you remain in your current unit. This means you have a reason to fear that if you do not receive a transfer you would suffer violence in the very near future.

OR

You are a victim of sexual assault and the assault occurred on the premises during the 90-calendar-day period before you request a transfer. If you are a victim of sexual assault, then in addition to qualifying for an emergency transfer because you reasonably believe you are threatened with imminent harm from further violence if you remain in your unit, you may qualify for an emergency transfer if the sexual assault occurred on the premises of the property from which you are seeking your transfer, and that assault happened within the 90-calendar-day period before you submit this form or otherwise expressly request the transfer.

Submission of Documentation: If you have third-party documentation that demonstrates why you are eligible for an emergency transfer, you should submit that documentation to your housing provider if it is safe for you to do so. Examples of third party documentation include, but are not limited to: a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom you have sought assistance; a current restraining order; a recent court order or other court records; a law enforcement report or records; communication records from the perpetrator of the violence or family members or friends of the perpetrator of the violence, including emails, voicemails, text messages, and social media posts.

Confidentiality: All information provided to your housing provider concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking, and concerning your request for an emergency transfer shall be kept confidential. Such details shall not be entered into any shared database. Employees of your housing provider are not to have access to these details unless to grant or deny VAWA protections or an emergency transfer to you. Such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

TO BE COMPLETED BY OR ON BEHALF OF THE PERSON REQUESTING A TRANSFER

1. Name of victim requesting an emergency transfer: _____
2. Your name (if different from victim's) _____
3. Name(s) of other family member(s) listed on the lease: _____

4. Name(s) of other family member(s) who would transfer with the victim: _____

5. Address of location from which the victim seeks to transfer: _____
6. Address or phone number for contacting the victim: _____
7. Name of the accused perpetrator (if known and can be safely disclosed): _____
8. Relationship of the accused perpetrator to the victim: _____
9. Date(s), Time(s) and location(s) of incident(s): _____

10. Is the person requesting the transfer a victim of a sexual assault that occurred in the past 90 days on the premises of the property from which the victim is seeking a transfer? If yes, skip question 11. If no, fill out question 11. _____
11. Describe why the victim believes they are threatened with imminent harm from further violence if they remain in their current unit.

12. If voluntarily provided, list any third-party documentation you are providing along with this notice:

This is to certify that the information provided on this form is true and correct to the best of my knowledge, and that the individual named above in Item 1 meets the requirement laid out on this form for an emergency transfer. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of admission, termination of assistance, or eviction.

Signature _____ Signed on (Date) _____

Attachment #7

CERTIFICATION OF
DOMESTIC VIOLENCE,
DATING VIOLENCE,
SEXUAL ASSAULT, OR STALKING,
AND ALTERNATE DOCUMENTATION

U.S. Department of Housing
and Urban Development

OMB Approval No. 2577-0286

Purpose of Form: The Violence Against Women Act (“VAWA”) protects applicants, tenants, and program participants in certain HUD programs from being evicted, denied housing assistance, or terminated from housing assistance based on acts of domestic violence, dating violence, sexual assault, or stalking against them. Despite the name of this law, VAWA protection is available to victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

Use of This Optional Form: If you are seeking VAWA protections from your housing provider, your housing provider may give you a written request that asks you to submit documentation about the incident or incidents of domestic violence, dating violence, sexual assault, or stalking.

In response to this request, you or someone on your behalf may complete this optional form and submit it to your housing provider, or you may submit one of the following types of third-party documentation:

- (1) A document signed by you and an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional, or a mental health professional (collectively, “professional”) from whom you have sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse. The document must specify, under penalty of perjury, that the professional believes the incident or incidents of domestic violence, dating violence, sexual assault, or stalking occurred and meet the definition of “domestic violence,” “dating violence,” “sexual assault,” or “stalking” in HUD’s regulations at 24 CFR 5.2003.
- (2) A record of a Federal, State, tribal, territorial or local law enforcement agency, court, or administrative agency; or
- (3) At the discretion of the housing provider, a statement or other evidence provided by the applicant or tenant.

Submission of Documentation: The time period to submit documentation is 14 business days from the date that you receive a written request from your housing provider asking that you provide documentation of the occurrence of domestic violence, dating violence, sexual assault, or stalking. Your housing provider may, but is not required to, extend the time period to submit the documentation, if you request an extension of the time period. If the requested information is not received within 14 business days of when you received the request for the documentation, or any extension of the date provided by your housing provider, your housing provider does not need to grant you any of the VAWA protections. Distribution or issuance of this form does not serve as a written request for certification.

Confidentiality: All information provided to your housing provider concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking shall be kept confidential and such details shall not be entered into any shared database. Employees of your housing provider are not to have access to these details unless to grant or deny VAWA protections to you, and such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

TO BE COMPLETED BY OR ON BEHALF OF THE VICTIM OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING

39

1. Date the written request is received by victim: _____
2. Name of victim: _____
3. Your name (if different from victim's): _____
4. Name(s) of other family member(s) listed on the lease: _____

5. Residence of victim: _____
6. Name of the accused perpetrator (if known and can be safely disclosed): _____

7. Relationship of the accused perpetrator to the victim: _____
8. Date(s) and times(s) of incident(s) (if known): _____

10. Location of incident(s): _____

<p>In your own words, briefly describe the incident(s):</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>

This is to certify that the information provided on this form is true and correct to the best of my knowledge and recollection, and that the individual named above in Item 2 is or has been a victim of domestic violence, dating violence, sexual assault, or stalking. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of admission, termination of assistance, or eviction.

Signature _____ Signed on (Date) _____

Public Reporting Burden: The public reporting burden for this collection of information is estimated to average 1 hour per response. This includes the time for collecting, reviewing, and reporting the data. The information provided is to be used by the housing provider to request certification that the applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking. The information is subject to the confidentiality requirements of VAWA. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid Office of Management and Budget control number.

Acknowledgment of Receipt

Please initial to confirm your receipt of the following documents related to your rights under the Violence Against Women Act (VAWA) protections:

_____ Notice of Occupancy Rights under the Violence Against Women Act

_____ VAWA Self-Certification Form – HUD Form 5382

Documents must be provided during the following timeframe:

At the time the applicant is denied program assistance or admission

At the time the applicant is provided assistance or admission

With any notification of eviction or notification of termination of assistance

At the time of annual recertification or lease renewal

Program Participant Signature

Date

Program Staff Signature

Date

A signed copy of this receipt must be kept in client files for each time they're provided with copies of the notices.

Attachment #9

**EMERGENCY SOLUTIONS GRANT (ESG)
RENTAL ASSISTANCE AGREEMENT**

Instructions: This Agreement covers ESG "Tenant-Based" Rental Assistance and must be completed by ESG Case Manager and Landlord when providing rental assistance under the rapid re-housing or homelessness prevention component of the ESG Program. **The Rental Assistance Agreement does not take the place of the lease between the program participant and landlord.**

Program Participant:

Address of Unit being rented:

Name of Apartment Complex if

applicable: _____

Landlord

Name: _____

Landlord Address: _____

Phone: _____

When providing tenant-based rental assistance, the Rental Assistance Agreement with the Landlord must terminate and no further rental assistance payments be made if:

- The program participant moves out of the housing unit;
- The lease terminates and is not renewed;
- The program participant becomes ineligible to receive ESG rental assistance.

During the term of the Rental Assistance Agreement, the Landlord must provide ESG Case Manager a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant.

Terms of Agreement: All payments must be made directly to the Landlord.

- The term of this Rental Assistance Agreement begins on _____ and ends on _____.

Security Deposit in the amount of: _____

Monthly Rent payable to the Landlord: _____

- Of the monthly rent, ESG portion is: _____
- Participant's rental monthly portion: _____

Payment Due Date: (Must be the same as participant's lease).

- Rental payment due date is: _____
 - Grace period for payment is: _____
 - Late payment penalty requirements are: _____
(ESG Program funds cannot be used to pay late payment penalty costs)
-

VAWA Protections: Victims of domestic violence, dating violence, sexual assault or stalking are entitled to the protections offered under 24 CFR part 5, subpart L." Landlords must comply with the following protections:

1. The Landlord may not consider incidents of domestic violence, dating violence, sexual assault or stalking as serious or repeated violations of the lease or other "good cause" for termination of assistance, tenancy or occupancy rights of the victim of abuse.
2. The Landlord may not consider criminal activity directly relating to abuse, engaged in by a member of a tenant's household or any guest or other person under the tenant's control, cause for termination of assistance, tenancy, or occupancy rights if the tenant or an affiliated individual of the tenant is the victim or threatened victim of that abuse.
3. The Landlord may request in writing that the victim or an affiliated individual of the tenant certify that the individual is a victim of abuse and that the tenant complete and submit documentation of abuse, using the Certification of Domestic Violence, Dating Violence, Sexual Assault or Stalking (Form HUD-50066 or HUD-91066), or other documentation as noted on the certification form, to receive protection under the VAWA. Failure to provide the documentation within 14 business days of request, or an agreed upon extension date, may result in eviction.
4. Any information submitted to the Landlord will be kept confidential and will not be disclosed to any other individual or entity except if disclosure is consented to by the victim, is required for an eviction or is otherwise required by law.

Landlord Signature

Date

Signature of ESG Case Manager

Date

Attachment #10

LEASE ADDENDUM
VIOLENCE AGAINST WOMEN REAUTHORIZATION ACT OF 2013

TENANT	LANDLORD	UNIT NO. & ADDRESS
--------	----------	--------------------

This lease addendum adds the following paragraphs to the Lease between the above referenced Tenant and Landlord.

Purpose of the Addendum

The lease for the above referenced unit is being amended to include the provisions of the Violence Against Women Reauthorization Act of 2013 (VAWA).

Conflicts with Other Provisions of the Lease

In case of any conflict between the provisions of this Addendum and other sections of the Lease, the provisions of this Addendum shall prevail.

Term of the Lease Addendum

The effective date of this Lease Addendum is _____. This Lease Addendum shall continue to be in effect until the rental assistance has ended.

VAWA Protections

- A. The Landlord may not consider incidents of domestic violence, dating violence, sexual assault or stalking as serious or repeated violations of the lease or other "good cause" for termination of assistance, tenancy or occupancy rights of the victim of abuse.
- B. The Landlord may not consider criminal activity directly relating to abuse, engaged in by a member of a tenant's household or any guest or other person under the tenant's control, cause for termination of assistance, tenancy, or occupancy rights if the tenant or an immediate member of the tenant's family is the victim or threatened victim of that abuse.
- C. The Landlord may request in writing that the victim, or a family member on the victim's behalf, certify that the individual is a victim of abuse and that the Certification of Domestic Violence, Dating Violence, Sexual Assault or Stalking, Form HUD-5382, or other documentation as noted on the certification form, be completed and submitted within 14 business days, or an agreed upon extension date, to receive protection under the VAWA. Failure to provide the certification or other supporting documentation within the specified timeframe may result in eviction.
- D. Any information submitted to the Landlord will be kept confidential and will not be disclosed to any other individual or entity except if disclosure is consented to by the victim, is required for an eviction or is otherwise required by law.

Tenant

Date

Landlord

Attachment #11

Macomb County

Macomb Community Action – Community Development

Notice of Equal Access in Accordance **with an Individual's Gender Identify**

History

On September 21, 2016, the Department of Housing and Urban Development (HUD) issued "Equal Access in Accordance With an Individual's Gender Identify in Community Planning and Development". The rule builds upon HUD's 2012 final rule entitled "Equal Access to Housing in HUD Programs regardless of Sexual Orientation or Gender Identity", which aimed to ensure HUD funded programs would be open to eligible people regardless of sexual orientation, gender identity or marital status. The 2012 Equal Access Rule did not address how transgender and gender non-conforming individuals should be accommodated in emergency shelters that require shared sleeping quarters and/or bathing facilities. "Equal Access in Accordance With an Individual's Gender Identify in Community Planning and Development" provides protections for transgender persons to ensure individuals are provided with services in accordance with their gender identity and in a manner that affords equal access to the individual's family.

Applicability (24 CFR 5.106)

This rule applies to assistance provided under Community Planning and Development (CPD) programs, including HOME, Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG). The requirements of this section apply to any subrecipients as well as owners, operators, and managers of shelters and other buildings, facilities and providers of services funded in whole or in part by any CPD program.

Definitions (24 CFR 5.100)

The final rule entitled "Equal Access in Accordance With an Individual's Gender Identify" amended HUD's definition of "gender identity" to more clearly reflect the difference between actual and perceived gender identity. HUD defines "gender identity" as the gender with which a person identifies, regardless of the sex assigned to that person's perceived gender identity.

"Perceived gender identity" means the gender with which a person is perceived to identify based on that person's appearance, behavior, expression, other gender related characteristics, or sex assigned to the individual at birth or identified in documents.

Required Practices (24 CFR 5.106)

Entities that receive HUD funding must provide equal access to programs, shelters, facilities, benefits, services and accommodations in accordance with an individual's gender identity. Individuals should be placed, served and accommodated in accordance with their gender identity. Temporary emergency shelters, including single-sex shelters must base client placement decisions on the gender with which a person identifies. Equal access should be afforded to the client's family as well.

Temporary emergency shelters and other buildings/facilities with physical limitations or configurations that require and are permitted to have shared bathing facilities or sleeping quarters, must place and accommodate clients in accordance with an individual's gender identity.

Record Keeping Requirements (24 CFR 5.106)

HUD funded entities must document and retain records of compliance with the requirements of this regulation for a period of 5 years.

Confidentiality & Privacy (24 CFR 5.106)

Shelters receiving ESG funding will abide by Macomb County's Emergency Shelter, HMIS, Homelessness Prevention and Rapid Re-housing Policy and Procedures regarding confidentiality.

Individuals cannot be subjected to intrusive questioning or asked to provide anatomical information or physical or medical evidence of their gender identity.

Policies and Procedures (24 CFR 5.106)

The admissions, occupancy, and operating policies and procedures of any subrecipients, owners, operators, managers, and providers, shall be established or amended, and administered in a nondiscriminatory manner to ensure that:

1. Equal access to CPD programs, shelters, other buildings and facilities, benefits, services and accommodations is provided with to an individual in accordance with the individuals gender identity, and in a manner that affords equal access to the individuals family;
2. An individual is placed ,served and accommodated in accordance with the gender identity of the individual;
3. An individual is not subjected to intrusive questioning or asked to provide anatomical information or documentary, physical, or medical evidence of the individual's gender identity; and
4. Eligibility determinations are made and assisted housing is made available in CPD programs as required by 24 CFR 5.105(a) (2).

Post Admission Accommodations (24 CFR 5.106)

HUD funded entities must take nondiscriminatory steps that may be necessary and appropriate to address privacy concerns raised by residents or occupants and as needed, update their policies and procedures in accordance with 24 CFR 5.106.

Other Federal Regulations (24 CFR 5.106)

Eligibility and assisted housing determinations must be made in accordance with 24 CFR 5.105(a) (2).

Grantee SF-424's and Certification(s)

OMB Number: 4040-0104
Expiration Date: 12/31/2022

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, enter appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>	4. Applicant Identifier: 33-6001368	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: 1-23-001-00-000	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Location: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: Macomb County		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 38-3006388	* c. Organizational DUNS: 028847130000	
d. Address:		
* Street1: 20000 Lumber Road, Suite 10	<input type="text"/>	
* Street2: <input type="text"/>	<input type="text"/>	
* City: Clinton Township	<input type="text"/>	
* County/Parish: <input type="text"/>	<input type="text"/>	
* State: MI - Michigan	<input type="text"/>	
* Province: <input type="text"/>	<input type="text"/>	
* Country: USA - UNITED STATES	<input type="text"/>	
* Zip / Postal Code: 48066-3600	<input type="text"/>	
e. Organizational Unit:		
Department Name: <input type="text"/>	Division Name: <input type="text"/>	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text"/>	* First Name: Stephanie	
* Middle Name: <input type="text"/>	<input type="text"/>	
* Last Name: Suryska	<input type="text"/>	
* Suffix: <input type="text"/>	<input type="text"/>	
* Title: Program Manager	<input type="text"/>	
Organizational Affiliation: <input type="text"/>		
* Telephone Number: 586-469-6000	* Fax Number: <input type="text"/>	
* Email: stephanie.suryska@macombmi.org		

Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="B: County Government"/>	
Type of Applicant 2: Select Applicant Type: <input type="text"/>	
Type of Applicant 3: Select Applicant Type: <input type="text"/>	
* Other (specify): <input type="text"/>	
* 10. Name of Federal Agency: <input type="text" value="Department of Housing and Urban Development"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text" value="14-018"/> CFDA Title: <input type="text" value="Community Development Block Grant (CDBG) Program"/>	
* 12. Funding Opportunity Number: <input type="text" value="H-20-CO-26-0008"/> Title: <input type="text" value="Community Development Block Grant (CDBG) Program"/>	
13. Competition Identification Number: <input type="text"/> Title: <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
* 15. Descriptive Title of Applicant's Project: <input type="text" value="Macomb County's CDBG program as described in the 2020 Annual Action Plan"/>	
Attach supporting documents as specified in agency instructions. <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: <input type="text" value="10212"/>	* b. Program/Project: <input type="text" value="13512"/>
Attach an additional list of Program/Project Congressional Districts (needed).	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
17. Proposed Project:	
* a. Start Date: <input type="text" value="07/01/2020"/>	* b. End Date: <input type="text" value="06/30/2021"/>
18. Estimated Funding (\$):	
* a. Federal:	<input type="text" value="1,887,306.00"/>
* b. Applicant:	<input type="text"/>
* c. State:	<input type="text"/>
* d. Local:	<input type="text"/>
* e. Other:	<input type="text"/>
* f. Program Income:	<input type="text" value="40,000.00"/>
* g. TOTAL:	<input type="text" value="1,927,306.00"/>
19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/>	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372	
20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes" provide explanation and attach	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="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)	
<input checked="" type="checkbox"/> ** 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: <input type="text"/>	* First Name: <input type="text" value="John Paul"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="Rosa"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="Deputy County Executive"/>	
* Telephone Number: <input type="text" value="585-969-7001"/>	Fax Number: <input type="text"/>
* Email: <input type="text" value="j.paul@macombgov.org"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="05/26/2020"/>

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4343-0006
Expiration Date: 02/28/2022

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 reports, 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. §§4726-4733) 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. §§1581-1583 and 1585-1586), 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. §§290aa-3 and 290aa-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.

Previous Edition Usable

Authorized for Local Reproduction

Standard Form 424C (Rev. 7-87)
Prescribed by OMB Circular A-102


- 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. §§1501-1506 and 7324-7326) 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 of 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 1986, as amended (16 U.S.C. §470; EO 11588 (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 the 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	
		Deputy County Executive	
APPLICANT ORGANIZATION		DATE SUBMITTED	
Macomb County		10/25/2023	

SP-4240 (Rev. 7-07) Back

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revised, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text" value="20-604009"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text" value="9-20-00-24-0009"/>	
State Use Only:		
8. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
II. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="Macomb County"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="38-6034868"/>	* c. Organizational DUNS: <input type="text" value="0265445130006"/>	
d. Address:		
* Street1: <input type="text" value="21685 Dunham Road, Suite 10"/>	Street2: <input type="text"/>	
* City: <input type="text" value="Clinton Township"/>	County/Parish: <input type="text"/>	
* State: <input type="text" value="MI: Michigan"/>	Province: <input type="text"/>	
* Country: <input type="text" value="USA: UNITED STATES"/>	* Zip / Postal Code: <input type="text" value="48855-0000"/>	
e. Organizational Unit:		
Department Name: <input type="text"/>	Division Name: <input type="text"/>	
f. Name and contact information of person to be contacted on matters involving this application:		
* Prefix: <input type="text"/>	* First Name: <input type="text" value="Burgess"/>	
Middle Name: <input type="text"/>	* Last Name: <input type="text" value="Burgess"/>	
* Suffix: <input type="text"/>	Title: <input type="text" value="Ecological Manager"/>	
Organizational Affiliation: <input type="text"/>		
* Telephone Number: <input type="text" value="586-459-4451"/>	Fax Number: <input type="text"/>	
* Email: <input type="text" value="stephanie_burgess@macombgov.org"/>		

Application for Federal Assistance SF-424	
<p>* 9. Type of Applicant 1: Select Applicant Type:</p> <p>E: County Government</p> <p>Type of Applicant 2: Select Applicant Type:</p> <p>Type of Applicant 3: Select Applicant Type:</p> <p>* Other (specify):</p>	
<p>* 10. Name of Federal Agency:</p> <p>Department of Housing and Urban Development</p>	
<p>11. Catalog of Federal Domestic Assistance Number:</p> <p>14 009</p> <p>CFDA Title:</p> <p>Home Investment Partnership Program (HOME)</p>	
<p>* 12. Funding Opportunity Number:</p> <p>W 20 DC CE 0209</p> <p>* Title:</p> <p>Home Investment Partnership Program (HOME)</p>	
<p>13. Competition Identification Number:</p> <p>Title:</p>	
<p>14. Areas Affected by Project (Cities, Counties, States, etc.):</p> <p>Add Attachment Delete Attachment View Attachment</p>	
<p>* 15. Descriptive Title of Applicant's Project:</p> <p>Macomb County's HOME program as described in the 2020 Annual Action Plan</p>	
<p>Attach supporting documents as specified in agency instructions.</p> <p>Add Attachments Delete Attachments View Attachments</p>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: <input type="text" value="10612"/>	* b. Program/Project: <input type="text" value="10522"/>
Add an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
17. Proposed Project:	
* a. Start Date: <input type="text" value="09/20/2020"/>	* b. End Date: <input type="text" value="05/30/2021"/>
18. Estimated Funding (\$):	
* a. Federal	<input type="text" value="1,729,122.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text" value="100,077.00"/>
* g. TOTAL	<input type="text" value="1,829,199.00"/>
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/>	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="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 28, Section 1001)	
<input checked="" type="checkbox"/> ** 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: <input type="text"/>	* First Name: <input type="text" value="John Paul"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="Wes"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="Deputy County Executive"/>	
* Telephone Number: <input type="text" value="585-422-7001"/>	Fax Number: <input type="text"/>
* Email: <input type="text" value="john.paul@macombcountymich.gov"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="05/26/2020"/>

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4340-0004
Expiration Date: 02/28/2022

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 this 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 interests 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 V of the Civil Rights Act of 1954 (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 1686-1688), 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 200 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.

Previous Edition Usable

Authorized for Local Readaptation

Standard Form 424D (Rev. 7-97)
Prescribed by OMB Circular A-102

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 11950; (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 175(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 1988 (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 1998 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 105(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
	Deputy County Executive
APPLICANT ORGANIZATION	DATE SUBMITTED
Macomb County	06/28/2020

SE-4240 (Rev. 7/07) Back

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, specify appropriate identifier: <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text" value="10-51-24-001"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text" value="E-28-00-25-0000"/>	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="Macomb County"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="00-0048868"/>	* c. Organizational DUNS: <input type="text" value="0260447100030"/>	
d. Address:		
* Street1: <input type="text" value="27385 Jackson Road, Suite 110"/>	Street2: <input type="text"/>	
* City: <input type="text" value="Canton Township"/>	County/Parish: <input type="text"/>	
* State: <input type="text" value="MI - Michigan"/>	Province: <input type="text"/>	
* Country: <input type="text" value="USA: UNITED STATES"/>	* Zip / Postal Code: <input type="text" value="48036-0000"/>	
e. Organizational Unit:		
Department Name: <input type="text"/>	Division Name: <input type="text"/>	
f. Name and contact information of person to be contacted on matters involving this application:		
-Prefix: <input type="text"/>	* First Name: <input type="text" value="Bridgette"/>	
Middle Name: <input type="text"/>	* Last Name: <input type="text" value="Bridges"/>	
Suffix: <input type="text"/>	Title: <input type="text" value="Executive Director"/>	
Organizational Affiliation: <input type="text"/>		
* Telephone Number: <input type="text" value="568-409-8451"/>	-fax Number: <input type="text"/>	
* Email: <input type="text" value="bbridges@macombcounty.org"/>		

Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="E: County Government"/>	
Type of Applicant 2: Select Applicant Type: <input type="text"/>	
Type of Applicant 3: Select Applicant Type: <input type="text"/>	
* Other (specify): <input type="text"/>	
* 10. Name of Federal Agency: <input type="text" value="Department of Housing and Urban Development"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text" value="14.031"/>	
CFDA Title: <input type="text" value="Emergency Solutions Grant (ESG) Program"/>	
* 12. Funding Opportunity Number: <input type="text" value="E-20-DC-26-0025"/>	
Title: <input type="text" value="Emergency Solutions Grant (ESG) Program"/>	
13. Competition Identification Number: <input type="text"/>	
Title: <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/>	
<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
* 15. Descriptive Title of Applicant's Project: <input type="text" value="Macomb County's ESG program as described in its 2020 Annual Action Plan"/>	
Attach supporting documents as specified in agency instructions.	
<input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: * b. Program/Project:

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

17. Proposed Project:

* a. Start Date: * b. End Date:

18. Estimated Funding (\$):

* a. Federal:	<input type="text" value="157,031.00"/>
* b. Applicant:	<input type="text"/>
* c. State:	<input type="text"/>
* d. Local:	<input type="text"/>
* e. Other:	<input type="text"/>
* f. Program Income:	<input type="text"/>
* g. TOTAL:	<input type="text" value="157,031.00"/>

* 18. 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:

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 28, Section 1001)

** I AGREE

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

Authorized Representative:

Prefix: * First Name:

Middle Name:


* Last Name:

Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:  * Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

GMB Number: 4040-0009
Expiration Date: 02/28/2022

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 (0345-0042), 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. §§1081-1683, and 1685-1688), 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. 92-266) 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. §§200 dd-3 and 250 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. §§8001 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.

Previous Edition Usable

Authorized for Local Reproduction

Standard Form 424D (Rev. 7-87)
Prescribed by OMB Circular A-102

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) inclusion 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 175(c) of the Clean Air Act of 1965, 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 ensuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11500 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§465a-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 awards in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL

APPLICANT ORGANIZATION
Macomb County

TITLE
County Auditor - Budget Rep
DATE SUBMITTED
1/6/2021

SP-494D (Rev. 08/19) Bacc

CERTIFICATIONS

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

Affirmatively Further Fair Housing –The jurisdiction will affirmatively further fair housing.

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 has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

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.

Consistency with plan – The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 – It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701a) and implementing regulations at 24 CFR Part 135.


Signature of Authorized Official

6/13/2020
Date

Dez. County Exec.
Title

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. **Maximum Feasible Priority.** With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. **Overall Benefit.** The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2020 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. **Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws – The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.



Signature of Authorized Official

6/26/2020
Date

Dep. County Executive

Title

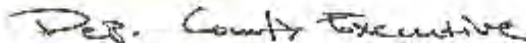
OPTIONAL Community Development Block Grant Certification

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.


Signature of Authorized Official

6/26/2020
Date


Title

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing.


Signature of Authorized Official

6/26/2020
Date

Dep. County Executive
Title

Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

Major rehabilitation/conversion/renovation – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long as the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

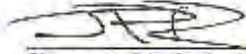
Matching Funds – The recipient will obtain matching amounts required under 24 CFR 576.201.

Confidentiality – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

Discharge Policy – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.



Signature of Authorized Official

6/14/2020

Date

Dep. County Executive

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.