

CITY OF DETROIT

Michael E. Duggan, Mayor

Housing and Revitalization Department
Donald Rencher, Director

2019 ANNUAL ACTION PLAN



2 Woodward Avenue, Ste 908 Detroit, MI 48226
www.detroitmi.gov/hrd



Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The U.S. Department of Housing and Urban Development (HUD) Consolidated Plan is a collaborative process establishing unified community development actions. The plan provides a comprehensive housing and community development vision that includes affordable housing, relocation, non-housing community development, fair housing, protection of the environment, and an avenue for citizen involvement.

According to HUD guidance the overall goal of community planning and development programs is to develop viable urban communities by providing decent housing, a suitable living environment, and expanding economic opportunities principally for low- and moderate-income persons. This is achieved by extending and strengthening partnerships among all levels of government and the private sector, including for-profit and non-profit organizations, in the production and operation of affordable housing. It also describes community development, homeless, non-homeless special needs/supportive housing needs, and strategies for a five year period. The plan is also designed to improve program accountability and support results oriented management. Information is gathered through a number of methods, including consultation with local agencies, public outreach, a review of demographic and economic data sets, and a housing market analysis. Once finished, these portions of the Consolidated Plan form the basis of the Strategic Plan. The Strategic Plan details how the grantee will address its priority needs. The strategies must reflect the current condition of the market, expected availability of funds, and local capacity to administer the plan.

The Annual Action Plan implements the strategies, goals, and objectives established in the Five Year Consolidated Plan. The Annual Action Plan is also the annual funding application for the Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), HOME Investment Partnership, and

Housing Opportunities for Persons With AIDS (HOPWA) programs. The 2019 allocations are shown below:

Program	2019 Award
CDBG	\$34,516,333
HOME	\$ 6,737,568
ESG	\$ 2,917,168
HOPWA	\$ 2,825,867
TOTAL	\$46,996,936

This year’s Annual Action Plan funding for all programs totaling **\$46,996,936** will be used to make:

- Decent housing available and affordable to low and moderate income citizens
- Suitable living environments available and/or sustainable in low and moderate income areas
- Economic opportunities available for businesses in the City of Detroit

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.

An accomplishment summary of outcomes and objectives the City expects to achieve in 2019 (for HUD-funded programs benefiting extremely low, very low, and low income residents) is shown in the table below:

	Outcome 1 Availability/Accessibility	Outcome 2 Affordability	Outcome 3 Sustainability
Objective 1 Decent Housing	\$5,561,791 325 Units	\$9,053,576 185 units; 3,055 people	N/A
Objective 2 Suitable Living Environment	\$6,569,518 48,372 people	N/A	\$4,048,387 50 units
Objective 3 Economic Opportunity	N/A	N/A	\$1,000,000 112 businesses

2019 Draft Accomplishment Summary (estimated)

Objectives and outcomes for each funded activity are shown in the attached activity chart (See the Attached Appendix, 2019-2020 Action Plan Budget Activity Spreadsheet).

3. Evaluation of past performance

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

During the past year the City of Detroit's performance was evaluated, by staff, noting the following accomplishments and challenges:

- The City of Detroit stayed within the statutory CDBG expenditure limitations for administration and public services
- Over 70 percent of the City of Detroit's CDBG funds were expended on activities benefiting low and moderate-income residents (Primary Objective)
- Financed the rehabilitation or development of over 757 housing units over the last year
- Awarded new lead grant to continue addressing lead poisoning issues in housing rehabilitation
- Continue to create and develop city-wide housing policy to set strategies for the City's future grant funding allocations
- As part of its economic development efforts, the City provided technical assistance, direct financial assistance, rehabilitation assistance, and infrastructure improvements to businesses and non-profits in Detroit
- The Emergency Solutions Grant (ESG) provided 10,085 homeless families and individuals with shelter and meals
- ESG provided a wide variety of services to the homeless, including, housing placement, clothing and food distribution, health care, case management, legal assistance, recreation, counseling, social service advocacy, education and job training and placement and homeless prevention
- HOPWA provided 220 eligible households with rental assistance or long-term housing
- HOPWA provided a wide range of services such as, housing placement, short-term emergency assistance, transportation, case management, life skills classes, health advocacy, clothing, and light housekeeping to 250 eligible households
- The City of Detroit met HUD's CDBG 1.5 spending requirement as of May 2019 (4th straight year), significant changes were implemented to help the City achieve the requirement.
- Provided workshops and host seminars for our Subrecipients and Community Developers

Recommendations to Improve Performance

In addition to the City of Detroit's accomplishments and challenges, the following suggestions would improve performance:

- The City will continue efforts in reconciling the accounting problems between HUD's Integrated Disbursement and Information System (IDIS) and the City's Enterprise Resource Planning (ERP) financial system
- Discontinue partial public facility rehabilitation funding. The City of Detroit should fund the complete rehabilitation needs of fewer facilities each year
- Fund public service organizations at amounts consistent with proposed project needs and ability to spend in a timely manner
- Continue to explore institutional structure available to provide small grants to neighborhood organizations (for targeted improvements and/or services without undue burden to staff productivity)

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

During the development of the 2019-2020 Annual Action Plan at least two public hearings must be held. One hearing is held at the beginning of the Annual Action Plan process and one is held later in the process (Draft Action Plan development).

The City of Detroit conducted its first public hearing on October 25, 2018 and the 2nd hearing was on June 26, 2019. The hearings was used to gain feedback into the 2019-2020 Action Plan process (see AP-12 Participation).

HRD staff along w/OCP and the Legislative Policy Division (LPD) jointly reviewed all CDBG proposals resulting in the following recommendations shown below:

Total Proposals Received for 2018-2019 **88**

Activity Number of Recommended Organizations **62**

Public Service activities	35
Homeless Public Service activities	25
Public Facility Rehabilitation activities	02

City Council held an appeals hearing for CDBG applicants and a public hearing on the Mayor’s CDBG proposal recommendations as part of the Action Plan budget process.

In addition, during the consultation process HRD staff spoke with key stakeholders to gain perspective on community needs. During the consultation process we contacted the following agencies and organizations or gathered information from their website:

Government Agencies:

- Detroit Department of Transportation
- Detroit Health Department
- Detroit Public Schools
- Detroit Building Authority
- HRD Office of Programmatic Underwriting
- HRD Office of Housing Underwriting and Supportive Housing
- HRD Office of Public Private Partnerships
- Planning & Development Department
- Wayne County
- Michigan Department of Community Mental Health
- Detroit Housing Commission (DHC)
- Michigan State Housing Development Authority (MSHDA)
- Michigan Department of Community Health (MDCH)

Community Organizations:

- Homeless Action Network of Detroit (HAND)
- Local Initiatives Support Corporation (LISC)
- United Way
- Fair Housing Center of Detroit
- Detroit Area Agency on Aging
- Southwest Solutions

Other Agencies:

- Detroit Economic Growth Corporation (DEGC)
- Detroit Land Bank Authority (DLBA)
- Detroit Future City (DFC)
- Employment Solutions Corporation
- Southeast Michigan HIV/AIDS Association

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.

The first 2019-2020 Action Plan public hearing covered the process for the upcoming year. The hearing also covered prior year accomplishments. The hearings were held on October 25, 2018 and June 26, 2019. A total of 15 individuals were in attendance as the result of the hearings. Comments focused on supporting community land trusts, changing the disproportion of Area Median Income to only include

the City of Detroit, HRD representative speaking at community meetings, displacement of refugees, tree trimming and 0% interest loans. (See AP-12 Participation)

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

All comments and views were accepted.

7. Summary

In 2013, the City of Detroit filed for bankruptcy, admitting in the largest U.S. municipal filing ever. Despite of going through a financial bankruptcy, The City of Detroit is projecting to end the 2018-19 fiscal year with its fourth consecutive balanced budget. The Mayor and the City Council continues to revitalize the City of Detroit with its enhanced long-term financial condition, implementing major reinvestments and improvements to public safety, neighborhoods, transportation, recreation and other public services that improve residents' quality of life. Federal funding will play an important role in that revitalization. The \$46,996,936 in funding is key in developing decent and affordable housing, providing suitable and sustainable living environments and economic opportunities for the citizens of the City of Detroit.

The City of Detroit applied and received approval for a Neighborhood Revitalization Strategy Area (NRSA) designation from HUD in 2015. The designation also makes housing rehabilitation accessible to all Detroit citizens regardless of income. The City of Detroit also established three Slum/Blight areas. These areas will take advantage of activities that aid in the prevention or elimination of blight. As this effort continues, Detroit is making progress against residential blight by repairing homes in both "NRSA" and "Slum and Blight" designated areas. In addition to using CDBG funds, and the City's General fund dollars, the City will Leverage private capital investment to increase home repair dollars to residents of the City of Detroit through the Zero Percent Home Repair Loan Program.

In January 2019, the City of Detroit was awarded \$4.1M for the Lead Hazard Reduction Grant. Program period of performance began on April 1, 2019 and will continue through September 30, 2022 (42 Months). 200 units are expected to be served over the 42 month period.

The Detroit Housing Commission (DHC) is designated as a standard performer in Public Housing and a high performer in Housing Choice Vouchers. DHC will continue to move toward the goal of achieving High-Performer status by overseeing and preserving 13 family and elderly public housing developments including four (4) federally funded HOPE VI revitalization projects, a comprehensive Capital Improvement Plan that addresses the physical needs assessments (input from DHC staff and residents) and program to preserve, disposal and/or the demolition of blighted properties in its inventory.

CDBG funds will support a lease-purchase program to convert eligible low-income renters in scatter site, single-family Low Income Housing Tax Credit (LIHTC) units into homeowners. Partial down payment assistance will be provided to approximately 54 current low-income renters to subsidize the cost of the homes and ensure that mortgages are sized to be affordable based on current tenants' rental income.

The consultation process with stakeholders was key to establishing goals and strategies for the 2019-2020 Action Plan. In addition to input from the Mayor and City Council, actions during the consultation process included the following:

- Two public hearings
- Review of pertinent documents
- Interviews with agencies and government officials
- A consensus review of CDBG NOFA submissions

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

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

Describe the agency/entity 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	DETROIT	Housing and Revitalization Department
HOPWA Administrator	DETROIT	City of Detroit Health Department
HOME Administrator	DETROIT	Housing and Revitalization Department
ESG Administrator	DETROIT	Housing and Revitalization Department

Table 1 – Responsible Agencies

Narrative (optional)

The Housing and Revitalization Department (HRD) is the responsible entity within the City of Detroit for the Consolidated Plan. In addition, to being the lead agency for the Consolidated Plan, HRD also manages HOME, ESG and much of the CDBG program. The HOPWA program is managed by the City of Detroit Health Department.

Consolidated Plan Public Contact Information

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AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

HRD has been working with the Detroit Land Bank Authority (DLBA) and Detroit Building Authority (DBA) on collaborative effort towards the goal of Detroit Housing Commission (DHC) achieving High-Performer status with HUD. HRD staff and the Homeless Action Network of Detroit (HAND) met throughout the year to develop a strategy for the allocation of ESG and other homeless funds to be used throughout the City of Detroit. HRD, as an ESG grantee, also works with HAND to develop performance standards, evaluate provider proposals, and help determine homeless community needs.

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(I))

HRD is working with the Detroit Housing Commission (DHC) on the Path to High-Performance goal. The goal will be achieved by collaborating with the DLBA and DBA. The plan is to acquire and dispose of vacant units from the DHC’s portfolio. These same units are barriers to DHC’s ability to reform and impact the community to effectively administer HUD housing programs and serve low income Detroiters. Currently, DHC is designated as a standard performer in Public Housing and a high performer in Housing Choice Vouchers. In the next fiscal year, DHC will continue to administer approximately 6000 Housing Choice Vouchers, and develop the following (4) federally funded HOPE VI revitalization projects: Woodbridge Estates, Cornerstone Estates, The Villages at Parkside and the Gardenview Estates.

Other benefits to the City will result in:

- Increases in access to rental assistance consistent with the City’s Inclusionary Housing Study recommendation
- Resolves complaints filed through the Department of Neighborhoods of vacant DHC homes in strong, occupied neighborhoods
- Well-located houses that DLBA can market and sell in University/Bagley District and on W. Grand Blvd.
- Southwest Counseling Solutions supports adult mental health and recovery services

During 2019-2020, 35 organizations are slated to provide the following priority services:

- Educational Services
- Senior Services
- Health Services
- Public Safety Services
- Recreational Services

These priority services were determined necessary through hearings, a prior survey instrument, agency input, and government input. CDBG funds are made available to community organizations to provide partial support for these priority services. These funds also help grantees leverage additional funding from other public and private funders. CDBG public service funds will also be used to provide employment for Detroit Youth in the City's designated NRSAs. The Summer Jobs for Youth training program was developed in partnership with private businesses and non-profit organizations. CDBG funds will be leveraged with a corporate match to provide services for youth outside the NRSAs.

Since the City funds many public services, it is in the interest of the City to make sure these services are provided in facilities that are up to code and Americans with Disabilities Act (ADA) compliant. Under the Public Facility Rehabilitation activity, the City provided funds to 2 different organizations. These facilities are typically:

- Neighborhood facilities
- Recreational facilities
- Youth facilities
- Senior facilities

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.

In 2015, the Continuum of Care was restructured to meet the guidelines laid out in the HEARTH Act. There is currently an elected and appointed Continuum of Care board tasked with making decisions on behalf of the larger community to meet the needs of those experiencing homelessness. This includes prioritizing projects through the CoC application process, implementing coordinated assessment, implementing the CoC/ESG written standards, and overseeing the work of various committees, including those tasked implementing plans for the provision of services to target populations. The CoC currently has population-specific subcommittees focused on chronic homelessness, youth, Veterans, and a families committee. The City of Detroit is well represented on this board, with three appointed seats, as well as on the majority of the subcommittees.

The Homeless Action Network of Detroit (HAND) serves as lead agency for the Detroit Continuum of Care (CoC). The City of Detroit meets monthly with HAND to discuss HMIS usage and implementation, best practices, training of ESG or CDBG homeless public services grantees, etc.

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

HRD staff have collaborated with HAND, as well as other funders of homeless services to establish written performance standards and has updated its Policies and Procedures Manual for the Emergency Solutions Grant and for all homeless service programs. These Policies and Procedures were published back on September 2018 and updated in April 2019.

The Performance and Evaluation Committee, has undertaken the goal of full implementation of the written standards and policies and procedures through the creation of a collaborative monitoring process for organizations who receive funds either through ESG or CDBG subgrantee awards and/or Continuum of Care resources. This will allow a “full picture” assessment of organization performance across programs to ensure they are making the desired impact to end homelessness for Detroit residents.

In addition, HAND participates in development of HRD’s CDBG and ESG Request for Proposals. HAND staff also participate in proposal review to ensure that entities:

- Align their efforts
- Fund quality providers that serve HUD priority populations (as outlined in the United States Interagency Council on Homelessness (USICH) program Opening Doors),
- Are in agreement regarding local community needs.

In past years, the City has also participated in reviewing new project applications for CoC reallocated or bonus dollars.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction’s consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Detroit Housing Commission
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Detroit Public Housing Commission and HRD collaboration efforts to coordinate projects within the City of Detroit w/the goal of achieving High-Performer status by acquiring approximately 400 vacant units. DHC also updated the Public Housing Section. (see AP-60)
2	Agency/Group/Organization	HOMELESS ACTION NETWORK OF DETROIT
	Agency/Group/Organization Type	Continuum of Care
	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?	HAND was closely involved in CDBG and ESG homeless planning and implementation activities throughout the year. (Also see AP-90 program specific requirements) Although since 1996, HAND has served as the lead entity for the Continuum of Care for the City of Detroit, its jurisdiction responsibilities stretches to other cities such as Hamtramck, and Highland Park, Michigan as well.
3	Agency/Group/Organization	Fair Housing Center of Metropolitan Detroit
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Fair Housing Center (FHC) of Metropolitan Detroit conducts training and fair housing tests. They represent fair housing crises in the Metropolitan Detroit area. The City of Detroit contacted the organization as a possible partner for training purposes and for fair housing conferences.
4	Agency/Group/Organization	Jobs and Economy Team
	Agency/Group/Organization Type	Other government - Local Grantee Department
	What section of the Plan was addressed by Consultation?	Market Analysis Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The JET is instrumental in developing economic development initiatives in the City of Detroit. Also, this team is exploring non-traditional development of open space for sectors such as utility-scale renewable energy generation and large-scale urban farming.
5	Agency/Group/Organization	Department of Neighborhoods
	Agency/Group/Organization Type	Other government - Local Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Community Development and Blight Control
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Several meetings were held with the Department of Neighborhoods staff to coordinate information regarding blight control and neighborhood conditions.
6	Agency/Group/Organization	Detroit Police Department
	Agency/Group/Organization Type	Other government - Local

	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Safety and Domestic Violence
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	We spoke with the Domestic Violence unit and visited their website for information. This coordination will allow us to determine the best funding strategy for domestic violence survivors.
7	Agency/Group/Organization	City of Detroit Health Department
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS Health Agency Child Welfare Agency Other government - Local Grantee Department
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs HOPWA Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City consulted with the Substance abuse unit and visited their website for information. This coordination will allow us to determine the best program strategy for substance abuse. The city also spoke with the HOPWA coordinator regarding HIV/AIDS. This coordination helps define Consolidated Plan HIV/AIDS strategies. The City of Detroit Health Department also assist with Lead-based paint and remediation strategy (see additional consultation/coordination plans in AP-85 Other Actions section under Action Plans to reduce lead-based paint hazards).
8	Agency/Group/Organization	Housing and Revitalization Department
	Agency/Group/Organization Type	Other government - Local

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis 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?	We spoke with the HOME team, CDBG emergency housing grant team, and the Zero percent Interest Loan team to document housing rehabilitation plans.
9	Agency/Group/Organization	Detroit Land Bank Authority
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Blight Control and Demolition
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	We gathered information from DLBA staff and their website regarding work completed and upcoming initiatives. HRD will use the information to better coordinate and report on demolition and blight control efforts.
10	Agency/Group/Organization	Detroit Regional Chamber
	Agency/Group/Organization Type	Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Market Analysis Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	To determine the type and extent of economic strategies available to revitalize the City of Detroit.
11	Agency/Group/Organization	Detroit Building Authority
	Agency/Group/Organization Type	Other government - Local

	What section of the Plan was addressed by Consultation?	Demolition of Dangerous structures
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	We spoke with the demolition coordinator for CDBG and other funding including General funds to coordinate efforts of demolition work between HRD, DON, and DBA that will assist in achieving the City's demolition goals.
12	Agency/Group/Organization	Local Initiatives Support Corporation
	Agency/Group/Organization Type	Services - 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?	LISC is consulted and is primarily responsible for operating the City's 0% interest loan program. The program is operated in the city's Neighborhood Revitalization Strategy Area (NRSA) and the designated Slum and Blighted area. LISC's coordinated efforts works with providing loans to low and moderated income persons in these designated strategy areas.
13	Agency/Group/Organization	Detroit Employment Solutions
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Detroit Employment Solutions along with City Connect Detroit are consulted to operate and provide the City's Summer Youth Employment and Job Training through a program called Grow Detroit's Young Talent (GYDT). GDYT is a summer youth employment program that combines work readiness training with on the job experience designed to prepare Detroiters ages 14-24 for Detroit's workforce. The CDBG funded portion supports summer youth low-income persons living in areas designated in one of the five Neighborhood Revitalization Strategy Areas.

14	Agency/Group/Organization	SOUTHWEST SOLUTIONS
	Agency/Group/Organization Type	Services - Housing Services-Health Services-Education Services-Employment Mental Health
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	

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

N/A

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	Homeless Action Network of Detroit	Collaboration between HRD and HAND will continue to impact the Action Plan homeless goals.
Detroit Master Plan of Policies	City of Detroit	The Master Plan outlines local policy supporting the plan project and activity development.
Affirmatively Furthering Fair Housing (AFFH)	City of Detroit	The AFFH is coordinated with the Consolidated Plan housing strategies and goals (including affordable housing).

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Capital Agenda	City of Detroit	The Capital Agenda identifies capital projects within the City of Detroit by city department.
Blight Task Force Report	Blight Task Force	The City of Detroit Blight Task Force report is in line with the Mayor's 10 Point Plan that guides strategies within the Consolidated Plan
Every Neighborhood Has A Future	City of Detroit	The Mayor's Neighborhood Plan guides investments within Detroit Neighborhoods including Consolidated Plan funding.
Detroit Future City Strategic Framework	Detroit Future City	Detroit Future City analyses provide vision and actions that coordinate with Consolidated Plan strategies and goals.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

The City of Detroit also works with the State of Michigan, Wayne County, Southeast Michigan Council of Governments (SEMCOG) and other adjacent entities to coordinate initiatives in the area.

AP-12 Participation – 91.105, 91.200(c)

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

The City of Detroit published and summarized the Action Plan and all associated public hearings in the Detroit Newspaper for public review and comments. The summary described the processes associated with planned development for the City of Detroit including a needs assessment, market analysis, strategic plan and purpose. The draft Action Plan is available for public review and comment for 15 days, following each public hearing. Copies of the draft Action Plan are also available to the public at the City of Detroit, Housing & Revitalization Department.

Two public hearings were held to allow citizens to review the FY 2019-20 draft Action Plan. The public hearings were October 25, 2018, 4:30 pm to 6:30 pm and June 26, 2019, 4:30 pm to 6:00 pm, at Housing & Revitalization Department, 2 Woodward Ave, Suite 908, Detroit, MI 48226.

The City of Detroit citizens are notified of public hearings a minimum of two (2) weeks prior to the hearing dates. Hearing participants received information about the Action Plan, Citizen Participation process, HUD requirements for an entitlement City, amount of funding that the City anticipates receiving and how those funds are used by the City of Detroit.

With reasonable notice, the City will make arrangements for non-English speaking residents to have translators take part in the public hearing and related activities. Such arrangements may include interpreters and preparation of selected materials in a foreign language. Persons with disabilities who need special accommodations, auxiliary aids, or other services to participate in the public hearings, should contact the Housing and Revitalization Department prior to public hearing. The Public Housing Commission notifies public housing residents (low-income) of a public hearing related to new public housing developments in the area.

During these hearings and meetings citizens and community organizations were given the opportunity to ask questions and offer input into plan development and funding recommendations.

The consultation process used several methods to involve individuals, community organizations, and local governments during information gathering. For example, to gather information and maintain communication flow with participants the following activities took place: public hearings, e-blast communication, notices posted at local libraries, public facilities and City website.

Participant comments were received through various means including the following: City of Detroit email, regular mail, in person and by telephone.

Public hearings contacts included community organizations, federal, state, and local governments. Information was gleaned from interviews and the internet (online reports, program information, strategies and studies). These organizations assist affected groups and service organizations including: youth, elderly, the disabled, persons with HIV/ AIDS, homeless individuals and families, public housing residents, housing advocates, housing developers, data analysts, other grant funders, fair housing advocates, and other special needs advocates.

There were CDBG and ESG onsite workshops held to provide technical assistance and best practices to non-profit organizations seeking grant funding. The workshops were held on August 17, 2018, Federal Reserve Bank-Detroit Branch, 1600 E Warren Ave, Detroit, MI 48207; August 18, 2018, Focus Hope, 1400 Oakman Blvd, Detroit, MI 48238; September 12, 2018, Samaritan Center, 5555 Conner, Detroit, MI 48213; March 1, 2019, Federal Reserve Bank-Detroit Branch, 1600 E Warren Ave, Detroit, MI 48207; May 9, 2019, Federal Reserve Bank-Detroit Branch, 1600 E Warren Ave, Detroit, MI 48207; May 21, 2019, Focus Hope, 1400 Oakman Blvd, Detroit, MI 48238; May 22, 2019, Focus Hope, 1400 Oakman Blvd, Detroit, MI 48238; June 10, 2019, Coleman A. Young Municipal Center, 13th floor, Detroit, MI 48226.

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)
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1	Public Hearing	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Community Organizations</p>	<p>Announcement of public hearing for Action Plan and CDBG Workshop: 11 attendees and 3 comments were received from the public hearing held on October 25, 2018; 4 attendees and 4 comments were received from the public hearing held on June 26, 2019.</p>	<p>Comment #1: Comment made by a citizen. Are there plans to address housing needs examined to support community land trusts? Has Detroit made any attempts to have HUD use actual AMI of Detroit, rather than Detroit-Warren-Livonia AMI? Comment #2: Comment made by a citizen. Would like to have a guest speaker to come to her community and speak to residents about how to get needs met. Want more information</p>	<p>All comments were accepted.</p>	<p>http://www.detroitmi.gov/hrd</p>
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				<p>about housing trust fund.</p> <p>Comment #3: Comment made by a community organization. She expressed critical concerns about equitable, affordable housing for all, including seniors, LMI populations, and immigrants/refugees. Stopping mitigating displacement. Senior programs, community development programs that protect senior safety and independence is critical.</p> <p>Comment #4: Comment made by a citizen. She</p>		
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				<p>expressed concern with high grass, tree trimming, and sidewalk repair in her area. Also, concerned with electrical connection that maybe illegal.</p> <p>Comment #5: Comment made by a citizen. He would like to see more affordable housing in the Mid-town area.</p> <p>Comment #6: Comment made from a citizen by telephone. She was concerned by applying for the Zero Percent Home Repair Loan because she does not have homeowner insurance. Her</p>		
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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)
				roof need replacing and unable to get insurance. Comment #7: Comment made from a citizen by email. The citizen requested information from the public hearing held on June 26, 2019.		
2	Newspaper Ad	Minorities Persons with disabilities Non-targeted/broad community community organizations	No written responses were received.	No written comments were received.	N/A	http://www.detroitmi.gov/hrd

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)
3	Internet Outreach	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing stakeholders	No written responses were received.	No written comments were received.	N/A	http://www.detroitmi.gov/hrd

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 Meeting	Minorities non-profit organization	There were a total of 607 attendees at the CDBG workshops/meetings. There were a total of 40 attendees at the ESG workshops/meetings.	At the workshops various persons asked questions and made comments. Interest consisted of HUD regulations, developing an understanding of data collection, reimbursement process, income tax clearance, evaluation and procurement process; and how to measure impact.	All comments were accepted.	http://www.detroitmi.gov/hrd

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The anticipated federal resources to carry out activities and projects during the program year include the Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME), Housing Opportunities for Person with Aids Program (HOPWA), and Emergency Solutions Grant (ESG). In fiscal year 2019-2020 the City of Detroit does not expect to receive any program income. In the 2018-2019 fiscal year, the City received \$392,722.00 in Section 108 loan settlements.

All funds have been allocated to meet housing, homeless, public service, and community development needs and goals identified in the Consolidated Plan. The City of Detroit plans to use these resources for the following eligible activities:

Eligible CDBG activities include: Blight Removal and Demolition, Community Development, Economic Development, Public Service, Homeless Public Services, Public Facility Rehabilitation, Home Repair, Relocation and staffing costs

Eligible HOME projects include: HOME NOFA, including: multifamily, rental, new construction, rehabilitation, and homebuyer assistance

Eligible HOPWA activities include: Permanent housing and transitional housing, supportive services, and information/referral services

Eligible ESG activities include: Rapid Re-housing, Transitional Housing, Financial Assistance, Overnight Shelter, Rental Assistance and Outreach Services.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	34,516,333	918,240	44,944,801	80,379,374	34,161,531	The CDBG funds will be used to benefit low-and-moderate income persons through various social and economic programs, assisting with housing needs and eliminating slums and blight in targeted areas. The funds will assist in restoring and restructuring distressed areas while improving population growth throughout the city. Also, funds maybe designated to perform relocation activities. (Note: The program income is estimated based on last year's program income received from the 0% interest loan home repair program. Also, the funds will not be used in the overall CDBG budget.)

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	6,737,568	0	12,194,662	18,932,230	10,975,196	HOME funds will be used to provide affordable housing including multifamily, rental, new construction, rehabilitation, and homebuyer activities to families whose household income is at 80% of the Area Median Income or less. Assistance will be provided in the form of grants and/or loans to for-profit and non-profit developers as gap financing. HOME funds will be leveraged with private and public funding sources to support the development of single and multifamily units through low income tax credits, equity from Federal Historic Tax Credits, developer equity, and from other banks and lending programs.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	2,825,867	0	2,599,947	5,425,814	2,339,953	The HOPWA program funds will be used to serve homeless and non-homeless persons who meet income guidelines and are infected/and or affected by HIV/AIDS through Tenant Based Rental Assistance (TBRA) and Community Residential Programs while providing information and supportive services.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	2,917,168	0	3,280,004	6,197,172	2,952,003	ESG funds will provide a 1 to 1 match with the CDBG Programs. Funds will be used for Emergency Shelters, Warming Centers, Homeless Prevention, Rapid Re-Housing and Street Outreach with the primary goal of eliminating homelessness.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - federal	Other	3,054,256	0	0	3,054,256	3,054,256	Declared Disaster Recovery (DDR) funds are intended to reduce weaknesses in Detroit aging storm water management system that contributed to the 2014 Flood. Proposed projects can establish more resilient, cost effective, and innovative infrastructure systems. These projects are designed to enhance quality of life by using natural systems to:1. manage storm water and reduce flooding2. spur economic development and neighborhood vitality3. decrease blight through vacant land use and strategic demolition

Table 5 - Expected Resources – Priority Table

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

The City of Detroit uses Community Development Block Grant (CDBG) funds to partially meet federal match requirements for the Emergency Solutions Grant Program (ESG). CDBG allocations awarded to homeless community organizations are applied to the match. The remaining ESG match is met by ESG recipients through in-kind contributions and other funding commitments.

The HOME program requires a 25% local match of funds that are expended on affordable housing. Currently, the City of Detroit does not have a matching requirement for the HOME program. For Fiscal Year 2018-2019, the City of Detroit met the HUD criteria for severe fiscal distress. The City of Detroit match requirement was reduced by 100%.

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

The City of Detroit owns public libraries, community parks and recreation centers located within the City.

The City of Detroit has a land bank authority that is responsible to return the city's blighted and vacant properties to productive and valuable use. The land bank maintains the City's publicly-owned parcels and acquires foreclosed/abandoned property and vacant lots. The City has addressed these properties through demolition, rehabilitation and disposition. To help stabilize the neighborhoods, the land bank authority utilizes a variety of sales programs. These programs are the Community Partner Program, Auctions, Own-It-Now, Rehabbed & Ready and Residential Side Lot.

There are selected land parcels that are owned by the City of Detroit that will be sold for new construction projects.

The Bank of America Charitable Foundation, Inc. awarded DFC a generous grant of \$50,000 in support of its Working With Lots program. The program provides technical assistance and mini-grants to community-based organizations working to sustainably repurpose vacant land in Detroit residential neighborhoods.

DFC will use the awarded grant funds to help underwrite operations of the Working With Lots program in 2019. In this calendar year, the program has awarded more than \$100,000 to 9 community-based organizations to carry out green, sustainable, and community-oriented land use projects in a variety of Detroit neighborhoods. Adaptive reuse projects through this program make use of DFC vacant land transformation designs published in the DFC Field Guide to Working With Vacant Lots.

Discussion

Detroit benefits from data-driven decision making. Data is now becoming readily accessible and shared across agencies and partners so evidence-based decisions can be made. While there is much work ahead to implement the vision for a revitalized Detroit, incremental progress is being made. Aligning resources to leverage other public, private and philanthropic investments will enhance impact and return on investment. The programs and activities as outlined in the Annual Action Plan move us closer to this reality.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Reduce homeless citizens in City of Detroit	2015	2019	Homeless	City-Wide	Emergency Shelter and Transitional Housing Homeless Outreach Homeless Prevention Rapid Re-housing Rental Assistance	CDBG: \$2,475,417 ESG: \$2,917,168	Tenant-based rental assistance / Rapid Rehousing: 845 Households Assisted
2	Rehabilitation of Existing Housing Units	2015	2019	Affordable Housing rehabilitation of existing housing units	City-Wide NRSA Areas Slums and Blight Designation	Rehabilitation of existing units	CDBG: \$5,561,791	Homeowner Housing Rehabilitated: 300 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Affordable Housing	2015	2019	Affordable Housing	City-Wide	Acquisition of Existing Units Production of new housing units Rehabilitation of existing units	CDBG: \$0 HOME: \$6,737,568	Rental units constructed: 100 Household Housing Unit Rental units rehabilitated: 500 Household Housing Unit
4	Econ Dev (Creation of Jobs/Small Businesses)	2015	2019	Non-Housing Community Development	City-Wide NRSA Areas	Economic Development Jobs/Small Business Public Services	CDBG: \$1,000,000	Businesses assisted: 112 Businesses Assisted
5	Public Services Activities for Citizens of Detroit	2015	2019	Public Service	City-Wide NRSA Areas	Public Services	CDBG: \$7,899,066	Public service activities other than Low/Moderate Income Housing Benefit: 35082 Persons Assisted
6	Public Facilities and Improvements	2015	2019	Non-Housing Community Development	City-Wide	Public Facilities	CDBG: \$400,000	Other: 2 Other
7	Blight removal and demolition	2015	2019	Demolition	City-Wide	Acquisition of Existing Units Demolition Clearing	CDBG: \$4,048,387	Buildings Demolished: 59 Buildings
8	Section 108 Repayment	2015	2019	Non-Housing Community Development	City-Wide	Economic Development	CDBG: \$5,880,859	Other: 8 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9	Help those with special needs (non-homeless)	2015	2019	Non-Homeless Special Needs	City-Wide	Homeless Prevention Public Services Rental Assistance	HOPWA: \$2,825,867	Tenant-based rental assistance / Rapid Rehousing: 220 Households Assisted HIV/AIDS Housing Operations: 30 Household Housing Unit

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Reduce homeless citizens in City of Detroit
	Goal Description	Homeless programs that address the needs of individuals who are homeless or at-risk of becoming homeless through homeless outreach, emergency shelter, homeless prevention, rental assistance, and rapid re-housing. These funds will be coordinated, collaborative, and community-driven in allocating resources throughout the City of Detroit.
2	Goal Name	Rehabilitation of Existing Housing Units
	Goal Description	Housing rehabilitation including emergency home repair and the zero interest loan program. This program will take place city wide, designated Neighborhood Revitalization Strategy Areas and designated slum and blight areas.
3	Goal Name	Affordable Housing
	Goal Description	HOME and CDBG funds used to support multi-family housing development.

4	Goal Name	Econ Dev (Creation of Jobs/Small Businesses)
	Goal Description	Small business assistance and creation of jobs
5	Goal Name	Public Services Activities for Citizens of Detroit
	Goal Description	Public Service providing for services for low-moderate incomes persons and families as well as NRSA public service.
6	Goal Name	Public Facilities and Improvements
	Goal Description	Public facility rehabilitation for places that offer public services.
7	Goal Name	Blight removal and demolition
	Goal Description	The program objective is to eliminate residential and commercial blight and stabilize neighborhoods.
8	Goal Name	Section 108 Repayment
	Goal Description	Repayment of Section 108 Section Loans for development projects.
9	Goal Name	Help those with special needs (non-homeless)
	Goal Description	Help those with HIV/AIDS with the housing and other services.

Projects

AP-35 Projects – 91.220(d)

Introduction

The activities described in the 2019-2020 Action Plan, reflect the City’s highest priorities and goals. Blight Removal and Demolition, Housing Development, Public Facility Rehabilitation, Public Services and Non-Housing Special Needs are critical community needs that will be addressed by investing HUD funds wisely and strategically. The plan is a culmination of data analysis, prioritization of resources, collaboration between the Mayor and City Council, and partnerships with community groups and other stakeholders to revitalize Detroit neighborhoods.

Over seventy percent of HUD funds are targeted in geographic locations that aligns with other investments, taking advantage of community assets and advancing the restoration of distressed communities. It is a strategy born of necessity. In Detroit, the demand for services far exceeds available funding levels, and almost all Census tracts in Detroit are over 51 percent low to moderate income. Accordingly, the Action Plan and Public Housing Assistance used geographic targeting to be more strategic in making investments that will benefit low and moderate income people throughout the City.

Projects

#	Project Name
1	ADMINISTRATION AND PLANNING (ADM/PLN)
2	BLIGHT REMOVAL AND DEMOLITION (DEMO)
3	ECONOMIC DEVELOPMENT (ED)
4	HOME Assisted Housing (HOME)
5	CDBG HOME REPAIR (HR) & LEAD REMEDIATION
6	HOMELESS PUBLIC SERVICE (HPS)
7	PUBLIC FACILITY REHABILITATION (PFR)
8	PUBLIC SERVICE (PS)
9	SECTION 108 LOANS (REPAY)
10	ESG19 Detroit (2019)
11	HOPWA Administration. HOPWA grant administration activities
12	DIRECT HOMEOWNERSHIP ASSISTANCE

Table 7 - Project Information

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

AP-38 Project Summary
Project Summary Information

1	Project Name	ADMINISTRATION AND PLANNING (ADM/PLN)
	Target Area	City-Wide NRSA Areas Slums and Blight Designation
	Goals Supported	Reduce homeless citizens in City of Detroit Rehabilitation of Existing Housing Units Affordable Housing Econ Dev (Creation of Jobs/Small Businesses) Public Services Activities for Citizens of Detroit Public Facilities and Improvements Blight removal and demolition Help those with special needs (non-homeless)
	Needs Addressed	Economic Development Public Services Public Improvement & Infrastructure Public Facilities Homeless Prevention Rental Assistance Production of new housing units Rehabilitation of existing units Demolition Clearing Acquisition of Existing Units Homeless Outreach Emergency Shelter and Transitional Housing Rapid Re-housing Jobs/Small Business
	Funding	CDBG: \$6,549,046
	Description	Administration - Direct staff costs related to HUD community development and program management. Planning - Direct staff costs related to community development and urban planning including conducting planning studies for low and moderate income neighborhoods for the City of Detroit.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	

	Planned Activities	
2	Project Name	BLIGHT REMOVAL AND DEMOLITION (DEMO)
	Target Area	City-Wide NRSA Areas Slums and Blight Designation
	Goals Supported	Blight removal and demolition
	Needs Addressed	Demolition Clearing
	Funding	CDBG: \$4,048,387
	Description	Blight Removal and Demolition- CDBG dollars will serve as a match for the Detroit Fire Escrow fund and to demolish vacant and abandoned residential and commercial buildings, schools and parks on an emergency basis. CDBG funds will complement over \$50 million in the Blight Investment Fund and General fund in residential demolition facilitated by HRD staff, the Detroit Building Authority and the Detroit Land Bank Authority.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Demolish vacant and abandoned commercial and residential buildings
3	Project Name	ECONOMIC DEVELOPMENT (ED)
	Target Area	City-Wide NRSA Areas
	Goals Supported	Econ Dev (Creation of Jobs/Small Businesses)
	Needs Addressed	Economic Development Jobs/Small Business
	Funding	CDBG: \$1,000,000
	Description	Economic Development endeavors aimed at sustaining or increasing businesses (incl. small businesses) activity levels and including job creation and /or retention.
	Target Date	6/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Improve economic opportunities for low-income persons; small business development for local businesses in the City of Detroit
4	Project Name	HOME Assisted Housing (HOME)
	Target Area	City-Wide
	Goals Supported	Affordable Housing
	Needs Addressed	Rental Assistance Rehabilitation of existing units
	Funding	HOME: \$6,737,568
	Description	The development of affordable new construction and acquisition rehabilitation housing units for rental to families whose household income is at 80% of the Area Median Income or less. Assistance will be provided in the form of grants and/or loans to for-profit and non-profit developers as gap financing.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
Planned Activities		
5	Project Name	CDBG HOME REPAIR (HR) & LEAD REMEDIATION
	Target Area	City-Wide NRSA Areas Slums and Blight Designation
	Goals Supported	Affordable Housing
	Needs Addressed	Rehabilitation of existing units
	Funding	CDBG: \$8,738,975

	Description	Home repairs and lead remediation for low/moderate income homeowners including staffing costs for single/multi-family housing. Provision of grants for eligible low- and moderate-income homeowners including 0% interest loans. The CDBG Lead remediation also matches the Lead Grant.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	see description
6	Project Name	HOMELESS PUBLIC SERVICE (HPS)
	Target Area	City-Wide
	Goals Supported	Reduce homeless citizens in City of Detroit
	Needs Addressed	Homeless Prevention Homeless Outreach Emergency Shelter and Transitional Housing Rapid Re-housing
	Funding	CDBG: \$2,475,417
	Description	Homeless public services to include rapid re-housing, street outreach, emergency shelter, and homeless prevention. These funds will be used to help match ESG.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	see description
7	Project Name	PUBLIC FACILITY REHABILITATION (PFR)
	Target Area	City-Wide
	Goals Supported	Public Facilities and Improvements
	Needs Addressed	Public Facilities

	Funding	CDBG: \$400,000
	Description	Rehabilitation of various public facilities throughout the City of Detroit
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	see description
8	Project Name	PUBLIC SERVICE (PS)
	Target Area	City-Wide NRSA Areas Slums and Blight Designation
	Goals Supported	Public Services Activities for Citizens of Detroit
	Needs Addressed	Public Services
	Funding	CDBG: \$5,423,649
	Description	Public service activities throughout the City of Detroit for various services including education, seniors, recreation/youth, public safety, and health.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	see description
9	Project Name	SECTION 108 LOANS (REPAY)
	Target Area	City-Wide
	Goals Supported	Section 108 Repayment
	Needs Addressed	Economic Development Public Improvement & Infrastructure
	Funding	CDBG: \$5,880,859
	Description	Repayments of section 108 Loans

	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Repayments of section 108 Loans
10	Project Name	ESG19 Detroit (2019)
	Target Area	City-Wide
	Goals Supported	Reduce homeless citizens in City of Detroit
	Needs Addressed	Homeless Prevention Homeless Outreach Emergency Shelter and Transitional Housing Rapid Re-housing
	Funding	ESG: \$2,917,168
	Description	Emergency Solutions Grant Administration and Projects for Rapid Re-housing, Emergency Shelter, Homeless Prevention and Street Outreach activities.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Emergency Solutions Grant Administration and Projects for Rapid Re-housing, Emergency Shelter, Homeless Prevention and Street Outreach activities.
11	Project Name	HOPWA Administration. HOPWA grant administration activities
	Target Area	City-Wide
	Goals Supported	Help those with special needs (non-homeless)
	Needs Addressed	Rental Assistance
	Funding	HOPWA: \$2,825,867
	Description	HOPWA Administration. HOPWA grant administration activities.

	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	HOPWA Administration. HOPWA grant administration activities.
12	Project Name	DIRECT HOMEOWNERSHIP ASSISTANCE
	Target Area	City-Wide
	Goals Supported	Affordable Housing
	Needs Addressed	Acquisition of Existing Units
	Funding	CDBG: \$300,000
	Description	CDBG funds will support a lease-purchase program to convert eligible low-income renters in scatter site, single-family Low Income Housing Tax Credit (LIHTC) units into homeowners. Partial down payment assistance will be provided to approximately 54 current low-income renters to subsidize the cost of the homes and ensure that mortgages are sized to be affordable based on current tenants's rental income.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
	Planned Activities	CDBG funds will support a lease-purchase program to convert eligible low-income renters in scatter site, single-family Low Income Housing Tax Credit (LIHTC) units into homeowners. Partial down payment assistance will be provided to approximately 54 current low-income renters to subsidize the cost of the homes and ensure that mortgages are sized to be affordable based on current tenants' rental income.

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

Analysis of consultations, plans, studies, and surveys were used to establish priorities. These priorities were also based on projects submitted during the City's CDBG proposal process, department recommendations, on-going and new development activities in the City, as well as priorities developed and considered during the review process. In addition, other Consolidated Plan programs (HOME, ESG, HOPWA, and CDBG-DDR) prioritized investment based on a combination of needs, development activities, and the ability to carry out projects. For 2019-20, priorities are listed below:

* Housing Rehabilitation

- 0% interest loan program
- Conventional Home Repair

* Public Service

- Education
- Seniors
- Health
- Public Safety
- Recreation

* Homeless Public Service

- Street Outreach
- Emergency Shelter Services
- Rapid Re-housing
- Homelessness Prevention

* Demolition

* Public Facility Rehabilitation

* Economic Development

* Section 108

* Administration/Planning

* Relocation

As discussed in the 2015-2019 Consolidated Plan, lack of resources is a primary obstacle to meeting underserved needs in the City of Detroit. The City has used federal grants to address the obstacle of decreasing resources and will continue seeking grant funds to meet underserved needs. The City has also committed its grant funds to areas with active, effective community organizations and community development corporations in the belief that local community efforts will increase the effectiveness of City activities in improving neighborhoods.

In addition, there were other challenges addressing underserved needs due to the declining population, vacant and abandoned structures and costs of providing services to the city's residents.

AP-50 Geographic Distribution – 91.220(f)

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

Through the Neighborhood Revitalization Strategy Areas (NRSA), the City of Detroit uses CDBG funds to address economic development and housing needs in designated neighborhoods. The City of Detroit NRSA plan seeks to focus investment in five areas. The following is a description of the five NRSA within the City of Detroit:

NRSA 1

Located between Jefferson Avenue and the Detroit River on the far-east side of Detroit. NRSA1 have a large number of vacant housing and vacant parcels that threatens stability. This NRSA have neighborhoods such as West Village, Jefferson Village, Jefferson-Chalmers and Marina district. The boundaries are: Jefferson Ave, Mack, E. Grand Blvd, and Mt. Elliott.

NRSA 2

Located on the City's Northeast side. NRSA2 have high levels of mortgage foreclosure that has led to an increase of abandonment and tax foreclosure. This NRSA have neighborhoods such as, Osborn, City Airport, Morning Side, Regent Park, East English Village, and East Warren Avenue commercial area. The boundaries are: E. 8 mile, Mound, Van Dyke, E. Warren, E. Outer Drive and Kelly

NRSA 3

Located in the Southwest Detroit target area. NRSA3 have a strong resident Hispanic community that is significantly investing in the housing market as well as the commercial district. The historic neighborhoods included in NRSA3 are Corktown, Hubbard Farms, and Woodbridge. Other neighbors are Springwells Village, and Mexicantown. The NRSA3 commercial districts include Vernor Highway and Michigan Avenue. The boundaries are: W. Warren, Lodge Fwy, E. Jefferson and Fort Street.

NRSA 4

Located within several historic neighborhoods such as the Boston Edison District, New Center and Arden Park. It also have neighborhoods including Hope Village, Dexter-Linwood, and Northend that have high vacancy rates, a concentration of City owned properties and significant tax and mortgage foreclosures. NRSA4 contains commercial districts, such as, McNichols and New Center. The McNichols commercial corridor is characterized by low-density service related business. The boundaries are: W. Grand Blvd, Wyoming, W. McNichols, and Lodge Fwy.

NRSA 5

Located on the Northwest side of Detroit. This NRSA includes areas surrounding the historic neighborhood of Grandmont-Rosedale, and Brightmoor neighborhood. There is a significant decline in population in the Brightmoor community. This NRSA area is surrounded by distressed housing markets with a considerable amount of publically-owned parcels and tax foreclosures. The boundaries are: Joy Road, W. Seven Mile, Telegraph, and Fenkell.

Slum and Blight Area

There are three (3) slum and blighted areas that meets HUD criteria.

Area 1 - Located on the west side of Detroit. The boundaries are Greenfield, Southfield Road, Lasher and Ford Road.

Area 2- Located on the southwest side of Detroit. The boundaries are Interstate I-75 highway, W. Jefferson (Detroit River) and Vinewood

Area 3- Located on the east side of Detroit. The boundaries are E. McNichols, Mt. Elliott, E. Davison and Conant Street.

Geographic Distribution

Target Area	Percentage of Funds
City-Wide	85
NRSA Areas	14
Slums and Blight Designation	1

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The majority of Detroit’s targeted investments will benefit low/moderate income people or low/moderate income areas. City-wide targeting takes into account that 83% of the City’s block groups have 51% or more low/moderate income residents. NRSA areas designated in 2015. Benefits include:

- Job Creation/Retention as Low/Moderate Income Area Benefit: Job creation/retention activities undertaken pursuant to the strategy may be qualified as meeting area benefit requirements, thus eliminating the need for a business to track the income of persons that take, or are considered for, such jobs (24 CFR 570.208 (a)(1)(vii) and (d)(5)(i));
- Aggregation of Housing Units: Housing units can be considered to be part of a single structure for the purposes of applying the low/moderate income national objective criteria. As long as 51% or more of all the assisted units provide a LMI benefit, all units are considered as meeting a national objective; therefore allowing assistance to housing occupied by non-LMI households. All eligible housing assistance such as home repair, new construction through a CBDO and home

purchase assistance are allowed. (24 CFR 570.208(a)(3) and (d)(5)(ii));

- Aggregate Public Benefit Standard Exemption: Economic development activities carried out under the strategy may, at the grantee's option, be exempt from the aggregate public benefit standards, thus increasing grantee's flexibility for program design as well as reducing its record-keeping requirements (24 CFR 570.209 (b) (2)(v)(L) and (M)); and
- Public Service Cap Exemption: Public services carried out in the NRSA by a Community Based Development Organization (CBDO) are exempt from the 15% public service cap allowing more services in the NRSA and better leveraging of public service funding. (24 CFR 570.204(b)(2)(ii)).

Major NRSA projects include the following:

- Youth Employment: This year the City will invest CDBG funds totaling \$2.9 million for Summer Jobs training program for Detroit youth. The program will provide job training, skill building, and employment opportunities for “at risk” and low-income youth to help them gain valuable workplace experience. Funds will be leveraged with a corporate match.
- 0% Interest Loan Program is budgeted for 2.5M. Loan funds are available City-Wide, CDBG funds also available for housing rehabilitation loans in NRSA areas
- Motor City Match/Restore program is vital to Detroit small businesses with funds totaling 1M. City's General Funds match additional 1M to program. The program assisted businesses with technical assistance, improving facade exteriors/landscaping. It's increased economic opportunities with job growth within the city and NRSA's

Specific CDBG related Slum/Blight areas: The City of Detroit launched a new initiative in 2015 designed to revitalize declining areas within the City. Three areas met the CDBG slum and blight “area basis” description. These areas met the following requirements:

1. The definition of a slum, blighted, deteriorating or deteriorated area under state or local law or ordinance. The area met one or both conditions of "a" or "b" below:

a) At least 25% of the properties in the area experience one or more of the following conditions: physical deterioration of buildings or improvements; abandonment of properties; chronic high occupancy turnover rates or chronic high vacancy rates in commercial/industrial buildings; significant declines in property values or abnormally low property values relative to other areas in the community; known or suspected environmental contamination, b) The public improvements in the area are in a general state of deterioration

Discussion

Target area activities will primarily benefit low/moderate income citizens or areas within the city where at least 51 percent or more Detroit residents are low/moderate income. This year at least 81 percent of investments will benefit low and moderate income citizens or low and moderate income areas within

the City (exceeding the minimum threshold for the primary objective[1]).

Geographic allocations will be targeted using a plan based on the Detroit Future Cities strategic plan, NRSA plan, and Slum and Blight designations. 83 percent of Detroit block groups have 51 percent or more low/moderate income residents. Accordingly, resources available in this Action Plan, DHC, and remaining NSP resources were geographically targeted to benefit as many low and moderate income residents as possible. HOME projects also target low and moderate income residents and targets specific geographic areas according to the HOME Notice of Funding Availability (NOFA). The HOME NOFA is scheduled for completion later this year.

City-wide activities provide services to the entire City, overlapping NRSA and Slum and Blight areas. City-wide allocations include CDBG and ESG organizations providing shelter, outreach, and services for the homeless and those at risk for homelessness. In addition, many housing programs such as HOPWA and CDBG (housing rehabilitation activities) are available city-wide. See Maps for NRSA and Slum & Blight areas.

To meet the CDBG Primary Objective, entitlement recipients must ensure that over a period of time specified in the certification, not less than 70 percent of the aggregate of CDBG expenditures shall be for activities meeting the criteria for benefitting low/moderate income persons.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Providing decent, safe, and affordable housing is a critical step to revitalizing many of Detroit's neighborhoods. It is also an important anti-poverty strategy. The City is committed to ensuring that existing housing is in good condition and new housing is built in areas targeted for growth, and that a path to housing is available for individuals and families who are homeless or at risk of homelessness, or are low to moderate income. By doing so, the City can help keep at-risk populations from becoming homeless and prevent housing costs from becoming an overwhelming burden to low and moderate income households.

The City uses a combination of Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME), Emergency Solutions Grants (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) funds to assist the most vulnerable populations in our community including homeless and low/moderate income housing needs. CDBG and ESG funds help prevent homelessness and assist those that are already homeless with shelter and supportive services. HOPWA funding addresses affordable housing needs faced by those struggling with an HIV/AIDS diagnosis. HOME, CDBG and 108 Loan funds are used to build rental housing, help with down payments and rehabilitate homes for low and moderate income persons/families in Detroit. HOME funds will be used primarily for Rental Housing projects. The City may use a portion of HOME funds to assist with tenant-based rental assistance to combat the growing dislocation problem. In addition, community partner funds are used with CDBG funds to provide Zero Percent Home Repair Loans to City of Detroit homeowners.

HRD funds its Senior Emergency Repair Program with CDBG and General Funds. These funds are used to serve low-to-moderate seniors who own their home with emergency rehabilitation items such as roofs, furnaces and hot water heaters. The City of Detroit was awarded \$4.1M from the HUD Office of Lead Hazard Control & Healthy Homes in January of 2019. Implementation of the program begins July of 2019. These funds address lead-based paint hazards in owner-occupied & rental-occupied units occupied by low-to-moderate income households. We received an additional \$1.2M in lead paint abatement funds from the MDHHS through the Medicaid Children's Health Insurance Program(CHIP) and has begun outreach to philanthropic entities to raise additional funds towards the abatement of lead paint hazards in low-to-moderate owner-occupied and rental homes.

In 2019-2020 the City will continue to refine the process used to select housing rehabilitation and new construction projects (for example in geographically targeted areas of the City). H&RD will continue to utilize the Targeted Multifamily Housing Areas Map to assist in making 2019-2020 HOME NOFA investment decisions. The City will seek to significantly leverage HOME, CDBG and other local funds with a clear, consistent, and updatable procedure including investing in stable communities where other

services are provided.

Goals for investing in rehabilitated and newly constructed housing in 2019-2020 include:

- Promoting and supporting sustainable, safe, and healthy homes and neighborhoods in the City of Detroit through housing rehabilitation and lead hazard control services
- Reducing distressed housing conditions and supporting blight reduction in neighborhoods
- Establishing formal criteria that can be used to make informed geographically targeted investment decisions

Other long term plans are underway to select the most appropriate grant subrecipients for target area work. Matching subrecipient strengths with priority rehabilitation and strategic goals may soon increase housing output.

One Year Goals for the Number of Households to be Supported	
Homeless	2,633
Non-Homeless	3,167
Special-Needs	2,018
Total	7,818

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	230
The Production of New Units	100
Rehab of Existing Units	800
Acquisition of Existing Units	50
Total	1,180

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

1. HOME: In the 2019-2020 HOME Notice of Funding Availability (NOFA), funds will be targeted to strategic areas in the City. In addition to targeting, discussed in the Geographic Distribution section above, HOME funds will also be prioritized for projects in areas with lower vacancy, market strength or areas located near local employment districts or transit. New construction will be limited to areas where there is clear demand and long term housing viability. Under the HOME Investor Rental Program HRD expects to rehabilitate 500 units and build another 100 rental units for low/moderate income individuals.

2. CDBG Rehabilitation: HRD's 2019-2020 Housing Rehabilitation Program will focus on the following:

- Eliminating lead-based paint hazards
- Repairing deteriorated building components affecting occupant's health and safety
- Reducing home energy losses

Detroit is making progress against residential blight by repairing homes in both "NRSA" and "Slum and Blight" designated areas. In 2019-2020 the City of Detroit's Senior Emergency Home Repair Program, currently administered by HRD, continues to assist low and moderate income senior residents with emergency home repair grants. In addition to using CDBG funds, the City will leverage private capital investment to increase home repair dollars to residents of the City of Detroit through the Zero Percent Home Repair Loan Program.. The following details how each method will serve low and moderate income homeowners:

- Senior Emergency Home Repair Grant – These CDBG funds, in addition to General Funds, are targeted to low and moderate income Senior Detroit homeowners. The grant is used to provide emergency replacement and repair of roofs, furnaces, porches, plumbing, and electrical concerns affecting the immediate health and safety of occupants. An estimated 150 homeowners will be assisted with an approximate expenditure of \$15,000 per home.
- Zero Percent Home Repair Loan Program - These privately leveraged CDBG funds will provide zero percent interest home repair loans and credit enhancements, to low and moderate income homeowners. The program will also provide loan guarantees to lenders, making these high risk loans attractive to investors in Detroit' future. In addition, those areas designated NRSA areas and Slum and Blight areas will allow residents who are above 80 percent of area median income to participate in the program. An estimated 100 homes will be assisted with an average CDBG expenditures of \$12,500, with a match of leveraged private capital, per home.

These improvements will be made in areas with market viability, density, and future housing demand.

3. CDBG Direct Homeownership Assistance Program: Under this pilot program, 54 low-to-moderate

income persons in four neighborhoods will be helped with down payment and closing costs assistance, also rehabilitation of 25 units of low and moderate income rental units.

4. Lead Hazard Reduction Program Grant: HRD was awarded \$4.1M in LHRD funds in January 2019. Program period of performance began April 1, 2019 and continues through September 30, 2022 (42 Months). 200 units are expected to be served over the 42 months.

AP-60 Public Housing – 91.220(h)

Introduction

The basic need of public housing residents is for decent, safe, affordable housing. To meet this need, the Detroit Housing Commission (DHC) does the following:

- Owns and operates 13 family and elderly public housing developments totaling approximately 3,500 units
- Oversees development activities for Four (4) federally funded HOPE VI revitalization projects (Woodbridge Estates, Cornerstone Estates, The Villages at Parkside (off-site component Emerald Springs) and Gardenvue Estates that provide rental and homeowner opportunities
- Administers approximately 6,000 Housing Choice Vouchers under the Assisted Housing Program
- Encourages homeownership and self-sufficiency through a number of different programs

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

The Detroit Housing Commission's (DHC) planned efforts to comprehensively and effectively address the needs of public housing will be executed in the following manner:

- DHC has created a comprehensive Capital Improvement Plan that addresses the needs of our properties based on the guidance received from Physical Needs Assessments, input from DHC staff and input from DHC residents. The Plan is created and executed in accordance with HUD guidance and regulations. DHC has effectively expended and administered CFP funds received to improve and preserve DHC properties. DHC will continue to develop and implement the Capital Improvement Plan to improve the quality of life for DHC's residents
- The Detroit Housing Commission has successfully been awarded an Emergency Safety and Security Grants in the past and will continue to see new opportunities to increase revenues or decrease expenses to improve our operations and our ability to serve the community in need of affordable housing
- DHC will create and follow a new Five Year Action Plan with an emphasis on ADA compliance, energy efficiency upgrades, vacancy reduction and the overall improvement of the physical condition of DHC's ACC inventory
- DHC will explore opportunities to collaborate with governmental agencies, non-profit community organizations, and developer partners to further the development & preservation of affordable housing in the City of Detroit
- DHC will continue to pursue the disposal and/or demolition of blighted properties in its inventory
- DHC will identify sources of financing to leverage its ability to increase affordable housing with the goal of increasing the total Annual Contributions Contract (ACC) Inventory to reach the PHA limits set in The Faircloth Amendment

- DHC will complete the development of Woodbridge Estates Phase IX. Woodbridge Estates phase IX will consist of 80 senior units which includes 39 ACC units
- DHC has and will continue to form partnerships with developers to provide Project Based Vouchers (PBV) rental assistance to further affordable housing in the City of Detroit
- DHC will look to leverage our Public Housing properties to further affordable housing and increase our ability to serve current and future residents. These actions may include selling properties such as Douglass Homes, partnering with entities to develop or provide services at properties such as at Graderniew Estates or Parkside or seeking tax-credits to aid in our redevelopment efforts
- DHC will consider converting some or all public housing properties to voucher assisted housing through the RAD program as approved and as determined to be beneficial to DHC and their residents
- DHC will seek out self-development as well as new development opportunities to assist with affordable housing initiatives
- DHC, with HUD national staff, will be opening an Envision Center to promote family self-sufficiency

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

The ongoing participation of the Resident Advisory Board as well as DHC's Resident Councils that cover 11 of 16 Communities is of the utmost importance as means of information sharing and provides the PHA and its residents with a forum to communicate, collaborate and participate in the Agency's Annual Plan process.

In compliance with Section 511 of the United States Housing Act and regulations in 24 CFR part 903, the DHC has an established Resident Advisory Board (RAB) that is an integral part of the PHA Annual Plan process. The DHC's RAB membership is comprised of resident members of all communities that are assisted by the PHA. The role of the RAB is to assist the PHA in developing the PHA Plan and in making any significant amendment or modification to the Plan which include but is not limited to Capital Improvement plans, Development plans, and policy or process changes to both the Low Income Public Housing and Housing Choice Voucher programs.

DHC presented its annual plan to the RAB board on January 31, 2019 and made the Plan available for comment on February 15, 2019. DHC had encouraged the public to comment on the draft throughout the 45-day comment period. At the conclusion of the comment period, DHC's Board of Commissioners held a public hearing on April 1, 2019 to seek feedback and input from the public. No public comments were received at the hearing. On April 1, 2019, DHC's Board of Commissioners approved the plan and submission to HUD was completed on April 18, 2019.

The Detroit Housing Commission has partnered with several HUD certified non-profit organizations to

assist in the preparation of residents to become Home Ownership ready. These programs and services include but are not limited to credit counseling, basic home maintenance, financial assistance and education. Additionally, the Detroit Housing Commission offers the Housing Choice Voucher Homeownership Program exclusive to DHC voucher participants to address the needs of the public housing residents.

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

The Detroit Housing Commission is designated as a standard performer in Public Housing and a high performer in Housing Choice Vouchers. DHC will continue to move toward the goal of achieving High-Performer status.

Discussion

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

Introduction

The City of Detroit addresses the needs of its most vulnerable citizens by working with local partners to fund and/or implement CDBG, ESG, and other activities to prevent homelessness, provide shelter, and supportive services. Homelessness funding is also used to support the Coordinated Access Model (CAM) and the Homeless Management Information System (HMIS). The CAM system is Detroit's implementation of coordinated entry system, used to assess those experiencing homelessness and match them to resources. HMIS is the database which allows the CoC lead agency, the Homeless Action Network of Detroit, to track program and system performance.

Several initiatives were created or strengthened over the course of the last year to help solve the most urgent needs of those experiencing homelessness and still help as many individuals and families as possible including: the full transition of the CAM system from a call center to site based "access point" model in 2018, which included the system-wide expansion of a homelessness diversion program to help avoid shelter entry and the completion of and implementation of policies and procedures for Rapid Rehousing, with all other components in-process, the use of the chronic by-name list for these experiencing chronic homelessness.

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

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

The City of Detroit is an active participant in an annual unsheltered Point in Time Count to assess progress toward ending homelessness. During the course of the last several years, we have seen a significant reduction in the overall number. However, due to severe weather conditions related to the polar vortex at the time of the 2019 PIT count we believe the 43% reduction in unsheltered homelessness is inaccurate. It is unclear how much change has occurred in the last year. However, our priorities remain the same. Specific to the unsheltered populations, the provider network is focused on:

1. Ensuring the safety of residents who are unsheltered during dangerous weather conditions through the funding of street outreach and seasonal warming centers.
2. Coordinating access to permanent housing for those sleeping rough as a high priority population.

During the 2019-2020 year, Detroit will continue to implement the coordinated assessment process that has been in place since early 2014. This coordinated assessment process reaches out to and assesses persons experiencing homelessness, and is required per the HEARTH Act. Locally, this system is referred to as the Coordinated Assessment Model (CAM). The intent of CAM is to provide a streamlined process by which people who are homeless or at-risk of homelessness are assessed for the most appropriate intervention to meet their needs, and to be able to access those resources.

Through the CAM, households experiencing homelessness, who are either residing in shelters or are unsheltered, receive an assessment using our community's common assessment tool--the Service Prioritization Decision Assistance Tool (SPDAT). The SPDAT assigns a numeric value to help determine what type of intervention a household is best suited for: either that the person will be able to end his/her homelessness on their own; shorter-term assistance such as Rapid Re-Housing (RRH); or longer-term, more intensive assistance such as permanent supportive housing. These assessments are completed at CAM access points. Once the assessment has been made, the household will be referred to a service provider to provide the assistance.

The creation of a chronic by-name list has ensured outreach providers are focused on completing assessments on persons who are unsheltered. These street outreach teams canvass the streets and strategically target locations where persons are known to be. In addition to outreach and engagement, these teams "navigate" the unsheltered to supportive housing by helping them compile the necessary documents to qualify for, and be matched to supportive housing.

In the 2018-2019 program year, 238 households were housed in supportive housing. 87% of those housed were chronically homeless, and many of that group were unsheltered who had been supported in obtaining housing by outreach teams, including those funded by the City of Detroit. Our community is hopeful that continuing to target those most in need will result in an overall reduction in chronic homelessness

Addressing the emergency shelter and transitional housing needs of homeless persons

Addressing emergency shelter needs

In the 2019-2020 year, Detroit will address the emergency housing needs of homeless persons in the following ways:

- Improving services to those in shelter. The City of Detroit published its Shelter Policies and Procedures as well as a training series designed to ensure standardization across programs and help shelter staff assist residents to obtain permanent housing.
- Ensuring access to emergency shelter: There are approximately 20 different emergency shelter providers. Some of these shelters are specifically targeted to youth, veterans, or victims of

domestic violence. These projects are expected to continue operations in 2019-2020.

- Warming Centers: During the winter additional seasonal emergency shelter programs opened to provide shelter space for persons during the cold weather months. It is estimated there will be three Warming Centers operating during the winter of 2019-2020.
- The City of Detroit will continue to support a highly successful shelter diversion program. This program, coordinated through the shelter access points, identifies persons seeking emergency shelter who could be diverted to an alternative housing setting with mediation support. In 2018-2019, a total of **1,721 households were diverted including:**

8% of total Single Adults presenting at Access Points

11% of Unaccompanied Youth presenting at Access Points

37% of adult families presenting at Access Points

43% of Parenting Youth presenting at Access Points

- In 2019-2020, The City will continue placing greater emphasis on housing outcomes for shelter providers through a revised RFP process which integrates performance metrics into scoring.

Addressing transitional housing needs

The Continuum of Care has reduced its inventory of transitional housing through strategic reallocations. In 2019-2020, the focus will be providing high quality transitional housing for individuals and families who express a desire to live in these settings and closing side doors to entry to ensure referrals come through the coordinated entry system

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

Chronically Homeless Individuals and Families - Permanent Supportive Housing (PSH) provides a permanent rental subsidy and wrap-around services for persons who have significant barriers to housing. The Detroit CoC currently has focused its recent efforts around ensuring that supportive

housing is going to the households who need it most, through the creation of a by-name list of those experiencing chronic homelessness and the preferencing of those who are unsheltered, chronically homeless and have a high level of vulnerability as determined by the VI-SPDAT for available units of

supportive housing.

Veterans and Their Families – The City of Detroit participates in the Built for Zero campaign to improve our community’s response to Veteran homelessness in the hopes of ending Veteran homelessness in Detroit. Through this process we have improved our community’s response to Veteran homelessness through the creation of policies and procedures on how Veterans are served, as well as the establishment of a high quality by name list of Veterans experiencing homelessness. We continue to monitor our progress through regular leadership team meetings and by name list meetings. There are currently just over 200 Veterans experiencing homelessness in Detroit. In our working on Veteran homelessness we deploy the following tools to address Veteran needs:

- Supportive Services for Veteran Families (SSVF): SSVF will provide both RRH and prevention assistance for veterans (both single veterans and families with Veteran head of households). RRH provides short- to medium-term rental assistance and services to quickly move people from a homeless situation back into housing. Prevention assistance provides assistance to persons at-risk of homelessness by using funds to pay rental or utility arrearages, or security deposits and limited rental assistance going forward for persons who need to move to a new housing unit. There are currently three SSVF programs operating in Detroit.
- HUD-VASH: HUD-VASH is a permanent supportive housing program funded by both HUD and the Veterans Administration (VA). There are currently over 300 HUD-VASH vouchers in Detroit.
- Grant Per Diem Transitional Housing (GPDTH): GPDTH beds provide transitional housing assistance to veterans experiencing homelessness, the majority of whom are single males. The intent of the GPDTH programs is to move these individuals into permanent housing.

Families with Children - The needs of families with children will be addressed by:

- A portion of the emergency shelter and transitional housing beds in Detroit will be specifically targeted to families with children
- Families with children will be eligible for ESG-funded RRH and prevention programs
- Linking families to Housing Choice Vouchers provided by the DHC or the Michigan State Housing Development Authority

Unaccompanied Youth - In the 2018-2019 year, the Youth Taskforce established by City Council President Pro-Tem Mary Sheffield submitted an application for the Youth Homelessness Demonstration Project. We are hopeful to be funded for this project in 2019. Additionally, the taskforce will continue to operate to coordinate a more seamless approach to addressing the needs of youth as a subset of the larger CAM system. In addition, the following resources will be available:

- There will be three emergency shelters that are specifically for youth.
- There will be four transitional housing programs specifically targeted to youth; three are able to serve pregnant/parenting teens.

- There will be an organization that specifically provides outreach, counseling, and supportive services to homeless youth who identify as Lesbian, Gay, Bisexual, Transgender, or Questioning (LGBTQ).

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.

Providing Financial Assistance - One key strategy for the 2019-2020 year will be to provide short-term leasing assistance and utility and/or rental arrears payments. Detroit will do this by using Emergency Solutions Grant (ESG) funds via RRH or Prevention.

Preventing discharges into homelessness: Within the Detroit CoC, there are State mandated policies that prevent a person from being discharged from one of these institutions of care into homelessness:

- Foster care
- Mental health care
- Correctional facilities

Additionally, providers within the CoC actively coordinate with these systems to help ensure that persons who have resided in each of them for longer than 90 days are not discharged into homelessness. For households that need affordable housing resources in order to avoid entry into homelessness, resources are provided by homelessness prevention providers, through State Emergency Relief provided by MI Department of Health and Human Services (MDHHS), as well as the safety net social service agencies that provide housing as support services to different subpopulations.

Providing supportive services: Through the ESG-funded programs, persons who are at-risk of homelessness will be able to access an array of supportive services to help stabilize a person experiencing a housing crisis, including mediation of landlord/tenant disputes, other legal assistance, and case management.

Expanding affordable housing opportunities: Detroit works to increase the availability of rental subsidies for low-income individuals and families and expand the use of Housing Choice Vouchers for those at risk of homelessness. When these opportunities are unavailable case managers often attempt to negotiate with landlords to make rents affordable.

Increased coordination with the local workforce investment board: The City of Detroit is working to help connect programs such as homelessness prevention to provide “warm handoffs” for individuals seeking

employment. Through a one stop center, Detroiters can receive a skills assessment and training, as well as job placement to help increase income and avoid entry into the homelessness system. This partnership began in 2019 and will continue and expand in 2020.

Discussion

During 2019-2020 year, CDBG funds totaling approximately \$2.4M will support the following homeless activities:

- Street Outreach
- Emergency Shelter Services (Shelter and Essential Services)
- Rapid Re-housing (Financial Assistance/Short Term Case Management, Housing Navigation, & Housing Relocation Stabilization Services)
- Homeless Prevention Services (Housing Navigation /Relocation Services & Foreclosure Prevention)
- Warming Centers

CDBG homeless funds are also used to meet the 2019-2020 ESG match. ESG regulations require a 100 percent match for every dollar received from HUD. During 2019-2020, CDBG funds will match approximately 85 percent of the 2019 ESG award. The remaining 15 percent match will be met by community organizations receiving ESG funding. Community organizations traditionally meet the match through in-kind contributions and other award commitments. The match is documented in their contracts.

AP-70 HOPWA Goals– 91.220 (I)(3)

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	0
Tenant-based rental assistance	220
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	30
Total	250

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

The City of Detroit is committed to increasing affordable housing opportunities for low and moderate-income households. The City's efforts to remove barriers to the development and preservation of affordable housing include stabilizing neighborhood housing markets, creating tools to address financial gaps in housing development and rehabilitation, enforcing policies designed to encourage mixed-income development, and making land available for the development of affordable housing.

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

The City is implementing a series of coordinated investments and processes to stabilize housing markets in ten neighborhoods by investing in mixed-income housing, single family housing stabilization, and community amenities. Market instability and decline have presented a barrier to the development of new affordable housing and has contributed to the erosion of affordable housing stock. This program, known as the Strategic Neighborhood Fund ("SNF"), supports the revitalization of ten Detroit neighborhoods. The SNF was designed to build stronger, healthier neighborhoods in by organizing community leadership and improving the engagement, empowerment and capacity-building of the residents and organizations in the target communities.

The City has developed an affordable housing loan program called the Affordable Housing Leverage Fund to fill gaps in affordable housing development projects. This program is designed to address barriers that prevent many traditional affordable housing finance tools from being deployed in the Detroit market by creating below-market interest products with flexible underwriting terms. This fund is expected to launch in 2019.

The City is also implementing its Inclusionary Housing Ordinance that requires new residential development projects receiving direct financial support from the City to reserve 20% of rental units as affordable housing. This approach guarantees affordable housing to low-income residents for many years. Additionally, the City's zoning ordinance division accepts recommendations to amend districts to include mixed-use commercial, single and multi-family residential development within low-income neighborhoods.

The City is pursuing strategies to utilize its significant public land inventory for the development of affordable housing. In partnership with the Detroit Land Bank, the City has identified parcels for affordable housing development and utilizing public RFPs and the option for below-market land sales to facilitate the development of affordable housing, including Permanent Supportive Housing.

Discussion:

The City of Detroit, Housing & Revitalization Department hosted an Affordable Housing Conference on January 25, 2019 at Marygrove College in Detroit, MI. The conference focused on learning, connecting and engaging on key issues around the development and preservation of affordable housing in Detroit.

The City of Detroit, City Council implemented a Fair Chance Housing Ordinance on February 15, 2019. This ordinance requires most rental housing in the City to follow a “Ban the Box” policy for returning citizens and covers everything from apartment complexes to single family homes. A “Ban the Box” policy will prevent landlords from asking potential renters about their criminal background until the landlord has determined that the candidate is qualified to rent under all other phases of the application process.

Pursuant to its authority under the Fair Housing Act, HUD has long directed program participants to undertake an assessment of fair housing issues—previously under the Analysis of Impediments to Fair Housing Choice (AI) approach, and following the effective date of the Affirmatively Furthering Fair Housing (AFFH) rule, under the new Assessment of Fair Housing (AFH) approach. This Guidebook (Guidebook) seeks to help program participants and members of the public understand the AFFH rule, the obligation to complete an AFH, and the linkage between an AFH and other required planning processes. For more specific information about AFFH fair housing planning obligations, refer to the AFFH rule.

The AFFH rule requires fair housing planning and describes the required elements of the fair housing planning process. The first step in the planning process is completing the fair housing analysis required in the AFH. The rule establishes specific requirements program participants will follow for developing and submitting an AFH and for incorporating and implementing that AFH into subsequent Consolidated Plans and Public Housing Agency (PHA) Plans. This process will help to connect housing and community development policy and investment planning with meaningful actions that affirmatively further fair housing. The new approach put in place by this rule is designed to improve program participants’ fair housing planning processes by providing data and greater clarity to the steps that program participants must take to assess fair housing issues and contributing factors, set fair housing priorities and goals to overcome them, and, ultimately, take meaningful actions to affirmatively further fair housing. A goal of the AFFH rule is to make sure states and insular areas, local communities, and PHAs understand their responsibilities in the area of fair housing planning. As the Department works to foster effective fair housing planning, goal setting, strategies, and actions, it recognizes that the people who are most familiar with fair housing issues in cities, counties, and states are the people who live there and deal with these issues on a daily basis.

A recent fair housing study conducted by Wayne State University revealed a need for more accessible housing in Detroit. This claim is supported by the fact that failure to accommodate a person with a

disability is one of the leading causes for fair housing complaints in Detroit over the past 5-years. The focus group participants stated disability is a frequent basis for fair housing violation because it is often obvious. In cases where a person's disability is noticeable, a potential landlord is often unwilling to accommodate them. Disability is a huge barrier to housing.

AP-85 Other Actions – 91.220(k)

Introduction:

A variety of collaborations, programs and initiatives that encourage job growth and provide services to those in need take place within the City of Detroit. Detroit has been hit hard by the foreclosure crisis, the 2008 economic downturn, population loss, bankruptcy, and other challenges experienced by older industrial cities. As such, demand for services, programs, and activities supported by federal funds have increased significantly thus the need for coordination, leveraging funds, collaborating on projects, and strategically targeting funds is imperative.

Actions planned to address obstacles to meeting underserved needs

The City of Detroit is focused on leveraging our funding with other government funding streams and private resources. For example, the City of Detroit will work with our federal, state, and local partners to develop new housing options for poverty level families through such programs as the Affordable Housing Leverage Fund or the Low-Income Housing Tax Credits (LIHTC). In addition, the City will continue to pursue opportunities presented on the federal level and will work with the Michigan State Housing Development Authority to fund LIHTC projects in target areas.

The City of Detroit will continue to focus efforts on addressing the needs of households who are experiencing housing insecurity, whether they be homeowners or renters, through a variety of innovative programs.

The community based foreclosure prevention program works to identify and engage households at risk of foreclosure in order to assist them prior to the point where they may lose their property. The City Department of Neighborhoods supports this effort in addition to assistance from community groups and philanthropy.

In situations where renters are losing their home due to non-payment of taxes, the Right of Refusal program, which was launched in 2018 in pilot form, may be helpful. Using funds raised by the partnership, the City acquires tax foreclosed homes through the City's right of first refusal from Wayne County. These homes are occupied by renters whose landlords failed to pay their property taxes, victims of property scams, those with solvable probate issues and owners who would have qualified for property tax reductions.

Then, the City will pass these homes to a non-profit partner (United Community Housing Coalition) at no additional cost, and UCHC will work with the individual renters and homeowners, allowing them to acquire the property with monthly payments set at an affordable rate. For former owner occupants experiencing poverty, UCHC will set the purchase price of the property at \$1,000; other purchase prices will be set based on costs of the home, the range in 2017 was between \$2,500 and \$5,500. Funds collected will be held by UCHC for use in future purchases.

Lastly, the City is working to establish clear guidelines in all circumstance to address potential displacement in properties where affordability requirements are expiring, or when formerly naturally occurring affordable housing (NOAH) properties are sold and renovated, resulting in rental increases. The City has already supported efforts to help tenants facing displacement, but intends to expand these efforts in the coming year.

We believe the divers activities described above will help the City sustain healthy neighborhoods for all Detroit residents.

Actions planned to foster and maintain affordable housing

The City of Detroit has developed targeted actions to foster and maintain affordable housing, with actions segmented into those that address multifamily rental housing and those that address single family housing, both rental and owner occupied. Goals and targeted actions include:

Multi-Family Housing: The City of Detroit developed and released a multifamily affordable housing strategy in 2018, which outlined two primary goals: to preserve 10,000 unites of existing affordable housing and develop 2,000 new units of affordable housing (including 300 units of supportive housing), both by 2023. Actions to achieve these goals are grouped into the following sub-strategies:

- Preservation Action Plan – The City is in the process of establishing the Detroit Preservation Partnership to implement the Preservation Action Plan that was developed with nearly 40 community stakeholders in 2017. The Partnership will be responsible for developing a complete database on all known affordable housing in Detroit, developing a prioritization strategy to prevent loss of affordability where developments are threatened by obsolescence or rising real estate market trends, and working with owners to develop preservation plans.
- Strengthen the Detroit Housing Commission – The Detroit Housing Commission (DHC) plays a central role in the City’s affordable housing system, overseeing more than 3,500 units of public housing and more than 6,000 housing choice vouchers.
- Leverage publicly owned land for affordable housing development – Non-recreational publicly owned land totals 13,700 acres, much of which is vacant or underutilized, and some of which includes vacant multifamily buildings that can be rehabilitated. The City has already taken several meaningful steps to leverage its land ownership to promote the development of affordable housing. The City will continue to require affordability as part of RFPs for residential

development on public land and will require expanded affordability on certain projects.

- Affordable Housing Leverage Fund - The City is partnering with a Community Development Financial Institution (Local Initiative Support Corporation (LISC)) to develop new affordable housing finance tools that are designed to facilitate increased affordable housing preservation and development activity. The Affordable Housing Leverage Fund is comprised of debt tools to address specific financing challenges in the Detroit market and will be capitalized with up to \$125 million in philanthropic and low-cost capital.

Single Family Housing: The City of Detroit is currently developing a comprehensive strategy to address the quality and affordability of the single family housing stock in the city. A strategy consultant is currently being procured, with an anticipated strategy release in spring 2020. The strategy is expected to include actions grouped into the following sub-strategies:

- Improve single family home repair programs – The City of Detroit administers and/or supports a range of resources for low- and moderate-income homeowners to address urgent housing quality issues and complete high-impact repairs. The City is actively working to increase the efficiency, accessibility, and cost effectiveness of these activities to increase the number of homeowners served.
- Build/Support capacity to make new affordable for-sale housing available through rehab and infill construction – The limited availability of move-in ready affordable housing has been a significant barrier to neighborhood stability and access to homeownership.
- Preserve housing stability for existing residents – The City will invest in programs and resources that assist residents remain in affordable housing situations by addressing these destabilizing forces.

Actions planned to reduce lead-based paint hazards

The 2015 American Community Survey (ACS), reports that approximately 93% of Detroit's housing units were built before 1978, with 32% being built before 1940. Given the age of the City of Detroit's housing stock, there's a growing concern of lead-based paint hazards in residential units. The City of Detroit, through its Housing & Revitalization Department (HRD), is committed to seeking funding in reducing lead hazards and providing prevention information and educational awareness with the various learning disabilities and other significant health issues among children living in affected homes.

Through HUD's Office of Lead Hazard Control and Healthy Homes (OLHCHH), funds are competitively awarded to help units of local government in making homes lead safe. These funds are used in conjunction with our Conventional Home Repair program activity to identify and remediate lead-based paint hazard in privately owned rental or owner occupied housing. In addition, the grant will also identify and address, where feasible, other health and safety issues through the use of a Healthy Homes

Rating System. This system "rates hazards for their potential to harm residents and enables those risks to be removed or minimized."

In 2019, HRD was awarded its 5th Lead Hazard Reduction Demonstration Grant from OLHCHH covering a 42-month period that began April 1, 2019 and ends September 30, 2022 with the closeout period until December 31, 2022. The target accomplishment is to reduce lead hazards in approximately 200 housing units in which children under the age of 6 resides. In 2018, HR&D was also awarded \$1.2M from the Michigan Department of Health and Human Services (MDHHS) to complete lead-based paint hazard remediation on an additional 30 units. This grant is expected to continue annually for at least another 3 years.

On January 1, 2010, The City of Detroit enacted legislation that included new requirements for rental property owners. Rental properties in the City of Detroit must have a Lead Clearance, certifying that properties are lead-safe before they can be rented out. This provision holds landlords responsible for lead hazard in their properties. That ordinance was updated in October 2017 to increase enforcement around the lead within the city that have higher rates of Elevated Blood Lead Levels (EBLLS).

The City of Detroit's Health Department (DHD) developed a coalition of city departments, state departments and community partners to coordinate childhood lead prevention in the City. The coalition, also known as Lead Safe Detroit, provides the following services: Provides capillary testing to children younger than 6 years of age and provides coordinated, comprehensive nursing case management services in the child's home; Maintains a data and surveillance system to track trends and better coordinate services throughout the city; Distributes lead prevention education material and provides presentations to parents, health care professionals, and rental property owners; Provides referrals to other agencies for lead hazard remediation; Ensures schools, daycares and homes have water testing; Strengthens Environmental Controls on Demolitions. In addition, Lead Safe Detroit meets on a monthly basis with multiple partners across the city and the Southeast Michigan region to work on a variety of lead prevention issues including, but not limited to, enforcement, service delivery, lead education, and lead-safe housing.

In March 2018, HRD partnered with multiple agencies including the Detroit Land Bank Authority, Detroit Building Authority, Detroit Health Department and Building & Safety Engineering Environmental Department to form the first ever Detroit Lead Poisoning Prevention Task Force and create a formal strategy to address lead poisoning in the City of Detroit.

Actions planned to reduce the number of poverty-level families

Housing, education, transportation, and job opportunities are all important aspects of Detroit's anti-poverty strategy.

Housing: See Affordable Housing section AP 55 for detail on HRD's efforts to reduce the number of

poverty level families by making decent, safe, and affordable housing available for those in need.

Education: Educational attainment is one key to bringing individuals out of poverty. According to the Winter 2015, Michigan Economic and Workforce Indicators and Insights, "The effects of increased levels of education attainment are evident when looking at the labor force participation and unemployment rates for the population 25 and over. There is a clear negative relationship between educational attainment and the jobless rate. It is also apparent that additional education enhances workforce participation." The Detroit Public Schools Community District approved a Community Education Commission, which will grade public schools and provide information to parents to help improve the district's overall performance. While there is still much work to do, an article published in the Detroit Free Press on May 13th noted that teacher vacancies in the district have reduced by more than half, and salaries have increased by more than \$5000 annually. Additionally, the Detroit Promise will fund a guaranteed two years of community college for Detroit students who graduate from any school in the city. CDBG funding for educational programs continues to be a City priority. For 2019-2020, CDBG Neighborhood Opportunity Fund will support approximately \$1 million in funding educational programs.

Transportation: Transportation to employment opportunities is important to combat the City's high jobless rate. Transportation priorities include: Improved cross-town transportation and options to get from the city to surrounding suburbs; Purchasing 20 new buses annually to improve the reliability of the fleet; Ensuring special needs groups (blind, deaf, disabled, and seniors) access to reliable transportation; Supporting the new Regional Transit Authority (RTA) in developing a master transit plan, including bus rapid transit.

Employment: A significant cause of poverty is the lack of employment opportunities. Detroit at Work is a program that was launched in February 2017. This program is a collaboration with the Detroit Employment Solutions Corporation (DESC), a non-profit agency dedicated to training and opportunities to match Detroiters to jobs. Detroit at Work is a single point of entry to jobs and training opportunities within the City of Detroit. Some highlights of recent workforce initiatives include: A number of programs designed specifically to address particular populations such as veterans and those recently released from prison; A Detroit Registered Apprentice Program (D-RAP) assisting Detroiters eager to acquire the technical skills needed to build a career; A Driver Responsibility Forgiveness fee that helps Detroiters get drivers licenses they lost back more quickly by participating in workforce training.

The Detroit Workforce Development Board is undergoing a significant rebidding process with the goal of improving access to training and employment placement, and improve linkages to other systems of care for those seeking employment help.

Support from local businesses, the City of Detroit has provided CDBG funds for youth employment within the five designated Neighborhood Revitalization Strategy Areas. The program provides job training, skill building, and employment opportunities for at risk and low-income youth helping them gain valuable workplace experience.

Actions planned to develop institutional structure

The City of Detroit has developed its institutional structure by establishing partnerships with City departments, neighborhood organizations, private institutions, non-profit organizations and continuum of care providers. When implementing the plan and to help carry-out the objectives in the Consolidated Plan and Annual Action Plan, the City will continue to coordinate and collaborate with its partners. Included in the partnership structure are the expertise of contractors, service providers and others with the specialized knowledge needed to carry out programs and projects. The Consolidated Plan programs are usually accomplished through (carry out) the Housing and Revitalization Department, contracts with subrecipients, Community Based Development Organizations (CBDO), HOME program developers, Community Housing Development Organizations (CHDOs) and other City departments.

The City's partners and their responsibilities in providing programs/services thru HUD's grant programs are the following:

The Planning & Development Department (P&DD) is responsible for: Historic designation advisory, historic review clearances, planning studies, site plan review, city master plan, zoning district boundaries approvals, and development plans.

The Detroit Building Authority, Detroit Land Bank Authority, and the Department of Neighborhoods are responsible for: Demolition of residential and commercial building and elimination of blight within the 7 districts in Detroit.

The City of Detroit, Health & Wellness Department funded programs/services are: The Housing Opportunities for Persons with AIDS (HOPWA) grant programs; and Tenant Based Rental Assistance (TBRA), Community Residential/Transitional, and Housing Supportive Services.

CLEAR Corps/Detroit, Health & Wellness Department, and Building Safety Engineering and Environmental Department (BSEED) collaborated efforts are through the following programs: Lead Prevention Program, Lead Safe Detroit, Lead Abatement Grant, Lead Education, Healthy Homes Detroit Program and lead hazard inspection for a rental property.

The Civil Rights, Inclusion and Opportunity (CRIO) Department, administers the Language Access Program, Skilled Trades Employment Program, the Detroit Business Opportunity Program, and the Construction Workforce Diversity Program. The Department is also tasked with investigating complaints of workplace violence, fair housing, sexual harassment, and discrimination of the protected classes.

The Office of Sustainability's mission is to create healthy, green, vibrant, accessible neighborhoods where all Detroiters can contribute and benefit through: Collaboration between City departments and agencies; Engagement and partnership among the City, citizens, and relevant organizations; and Process and policy improvement.

The HRD housing programs are collaborated with the Detroit Housing Commission (DHC). The DHC manages the Housing Choice Voucher Program, Section 8, for low-income rental housing.

The HRD homeless programs are collaborated or carried out by a human service organization, Wayne Metropolitan Community Action Agency (WMCAA). WMCAA provides essential services, and community resources to low- and moderate-income individuals and families throughout all of Wayne County. The services include the following: Housing placement, moving, utility assistance, health care, weatherization, transportation and food access.

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

HRD will actively continue its support to the Detroit Housing Commission in the efforts that resulted in the DHC coming back from “troubled” status to Standard Performer through to High Performer status with HUD along with maintaining its Assisted Housing Department’s High Performer status with the Housing Choice Voucher Program. This designation will give DHC the ability to access more financial support for public housing through competitive applications such as Choice Neighborhood and Moving to Work (MTW).

The City of Detroit will also be supporting the DHC in the development of an EnVision Center. HUD Secretary Dr. Ben Carson is promoting the establishment of EnVision Centers to leverage public and private resources for the benefit of individuals and families living in HUD-assisted housing. EnVision Centers will offer HUD-assisted families access to support services that can help them achieve self-sufficiency.

Discussion:

Program Specific Requirements

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

Introduction:

While it is not possible to address all the housing and non-housing needs identified in this Action Plan HRD will do its best to strategically invest funding from the four federally funded programs. CDBG funds will be used to benefit low-and-moderate income persons through various social and economic, and housing homeownership assistance programs. HOME funds will be used to provide affordable housing including new construction of multi-family rental units. HOPWA program funds will be used to serve homeless and non-homeless persons residents infected and/or affected by HIV/AIDS through Tenant based Rental Assistance (TBRA) and Community Residential Programs while providing information and supportive services. Finally ESG funds will be used for emergency shelters, warming centers, homeless prevention, rapid re-housing and street outreach.

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	0
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:	0

Other CDBG Requirements

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

0.81%

**HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)**

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

The City investments of HOME funds will only take the forms listed in Section 92.205.

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 City does not currently undertake homebuyer activities through the HOME Investment Loan Program.

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

Although the City does not currently undertake homebuyer activities with HOME funds, the City of Detroit may use any of the following methods to ensure affordability for 5 years for income eligible applicants when using CDBG or NSP funds for homebuyer assistance:

1. Prorate the amount recaptured based on the time the homeowner has owned and occupied the units measured against the required affordability period. A portion of CDBG homebuyer assistance provided may be required to be repaid if the property is sold or ownership is transferred prior to the end of the 5 year lien, based on the percentage of the affordability period that has expired.
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 City of Detroit may use HOME funds to refinance existing debt secure by multifamily housing if

the following conditions are met:

1. The refinance enables the property to recapitalize through a rehabilitation that totals not less than \$10,000 per unit;
2. The owner is able to demonstrate that disinvestment in the property has not occurred, and that the project is financially feasible for the length of the affordability period;
3. The owner must enter into an affordability agreement, recorded as a covenant running with the land, that either preserves affordability, or creates new affordable units for a period of 15 years;
4. The property must be located in the City of Detroit;

HOME funds may not be used to refinance single family or multifamily loans made or insured by any Federal program, including CDBG;

Emergency Solutions Grant (ESG) Reference 91.220(l)(4)

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

Written standard for providing ESG were formalized and approved by the CoC board in 2016. The written standards need to be updated due to system changes. These updates are anticipated to be completed by the CoC Performance Evaluation Committee and approved by the CoC board by the end of the 2019.

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 Detroit Continuum of Care had created a coordinated assessment system that assesses all clients seeking services with a standardized assessment tool (the VI-SPDAT), and ensures coordinated entry into shelter programs and prioritization of clients for housing and services on the basis of their assessment score. The Coordinated Assessment Model, or CAM, as it is known locally, moved from a call center to an in-person access point model in late 2017/early 2018. The CAM lead implementer for Detroit is Southwest Solutions. During the course of 2018 and 2019, the community completed a local evaluation of the CAM lead and process to understand how well the program is serving the community and opportunities for improvement.

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).

The City continues to use its CDBG funds as a match for the annual ESG allocation. The City of Detroit uses an RFP process each year to select the best qualified organizations to implement ESG activities. In 2019-2020, the City of Detroit combined the RFP and contracting process for ESG and

CDBG in the hopes of streamlining processes for both city staff and subrecipients. Organizations are required to provide proof of any required match at the time of grant award. Matching sources may include cash contributions expended for allowable costs, and non-cash contributions including, but not limited to, the value of any real property, equipment, goods, or services provided that the costs would have been allowable.

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 City of Detroit adheres to homeless participation requirements at 24 CFR 576.405(a). The City of Detroit has required that all sub grantee organizations appoint one homeless or formerly homeless individual to its board of directors in order to be considered for ESG funding. Our purpose is to ensure the voices of those who have experienced homelessness are integrated into the service work of these agencies. Proof of this appointment is required to be included as an attachment with RFP submissions.

5. Describe performance standards for evaluating ESG.

ESG performance is evaluated from both a programmatic and financial perspective. Organizations are assessed for risk prior to grant award, and financial and programmatic monitoring is integrated into the work of the contract managers. We ensure the performance of organizations both through the utilization of HMIS data and the qualitative information obtained through file review. The City of Detroit has finalized ESG Policies and Procedures (attached) which further detail performance expectations to increase accountability. During the 2019-2020 RFP for the Homelessness Solutions programs, the City defined performance measures, established baselines, and benchmarks for organizations to meet during the coming year.

Maps and HOPWA's method for selecting project sponsors can be also viewed in the appendices.

Attachments

City of Detroit
Housing & Revitalization Department
Public Hearing 1
2019-20 Action Plan
Record of Public Hearing

Purpose: To receive citizen comments on the 2019-20 Draft Action Plan

Participants: **REPORTING AND COMPLIANCE DIVISION**

Warren T. Duncan

Jennifer Mahone

Marlene Robinson

CITIZEN PARTICIPANTS

11 individuals

Location: Housing and Revitalization Department
Coleman A. Young Municipal Center
2 Woodward Avenue, Suite 908
Detroit, MI 48226

Date & Time: October 25, 2018 4:30 pm – 6:30 pm

Summary:

The Housing & Revitalization Department staff conducted the hearing. Mr. Duncan provided hand-outs of the Annual Action Plan process, the prior year 2019-2020 actual CDBG/NOF sub-recipient awards and program descriptions. Citizens were given the opportunity to comment and present their opinions regarding the 2019-20 Annual Action Plan process. There were 11 individual citizens and HRD staff in attendance.

There were 3 citizens that had questions/comments.

Question/Comment 1:

Are there plans to address housing needs examined to support community land trusts? Has Detroit made any attempts to have HUD use actual AMI (area median income) of Detroit rather than Detroit-Warren-Livonia AMI?

Response to Question/Comment 1:

The citizen was provided the following information: The Department of Housing and Urban Development (HUD) calculates the area median income for every metropolitan region in the country. HUD focuses on the

region, rather than just the city, because families searching for housing are likely to look beyond the city itself to find a place to live. Locally this includes Detroit-Warren-Livonia Metropolitan Statistical Area.

Question/Comment 2:

Like to see a guest speaker willing to come to the community and speak to residents about how to get needs met. Would like information about Housing Trust and Land Trust. How is the City managing this?

Response to Question/Comment 2:

The citizen was provided the following information: There is a new city department called “Office of Sustainability”. This office conducts community engagement meeting in every neighborhood to receive feedback on challenges faced by residents and businesses, opportunities to improve quality of life and suggestion how to build a more sustainable city. The citizen was given the contact number and address for the Office of Sustainability. In addition, the Detroit’s Inclusionary Housing Ordinance was discussed because the trust fund is used to support this ordinance.

Question/Comment 3:

- 1. There are critical concerns centered on ensuring equitable, affordable housing for all, including seniors, LMI populations, and immigrants/refugees. Stopping mitigating displacement.*
- 2. An increased emphasis on accessible, age friendly community infrastructure is often key. Senior programs, community development efforts, etc. that protect seniors’ safety and independence is critical.*

Response to Question/Comment 3:

The citizen was provided a list of senior programs that is funded by CDBG and a brochure on the affordable housing strategy plan. The citizen was provided the contact information to the Housing & Revitalization Department immigration unit for her concerns.



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Is beauty in the eye of the beholder?

Ask Peter Weller. The actor-turned-art-historian – famously known for playing RoboCop – will be one of a host of internationally known artists, inventors and filmmakers tackling “The Crisis of Beauty” at this year’s Culture Lab Detroit.

The three-day event scheduled for October kicks off with a screening of the original 1987 RoboCop at 8 p.m. Oct. 10 at the Senate Theater, 6424 Michigan Avenue, Detroit.

“Detroit has a history of exploring the connections between culture and social progress,” Culture Lab Detroit founder Jane Schullak said. “We’re thrilled to bring some of today’s most compelling voices to Detroit to contribute to this vital conversation.”

Organizers said the program will explore how beauty intersects with multiculturalism, gentrification, gender politics and the assimilation of technology.

On Oct. 11, a program called “The Aesthetics of Tomorrow” will begin with a 6 p.m. reception and a 6:30 p.m. discussion at the Senate Theater. Participants will include



A still image from the film, Theesatisfaction “Queens” in 2012. Directed by dream hair CULTURE LAB DETROIT



Peter Weller starred in the 1987 film RoboCop.

ORION PICTURES CORPORATION

director of Forensic Architecture; and conceptual artist Anicka Yi.

The program will be moderated by Yesomi Umolu, artistic director of the 2019 Chicago Architecture Biennial and exhibitions curator at the Reva and David Logan Center for the Arts, University of Chicago.

Weller will be a special guest.

On Oct. 12, a program called “Seeing and Being Seen” will begin with a 6 p.m. reception and 6:30 p.m. dialogue at The Church of the Messiah, 231 E. Grand Boulevard, Detroit. Participants will

include filmmaker a dream hampton; Juliette, conceptual artist, performer and painter Amy Shajzmine Hughes; editor for The New York Magazine, will moderate The Rev. Barry Ralston, The Church of the Messiah. The special guest Culture Lab Detroit and open to the public. More information, turelabdetroit.org. Contact staff at Zaniwuski at 313-222-azaniwuski@freepress.com. Follow her on Twitter @AnnZaniwuski.

Boy, 2, shoots himself in Detroit

Ann Zaniwuski
Detroit Free Press
USA TODAY NETWORK

A 2-year-old boy remains hospitalized in stable condition after finding a gun in a home and shooting himself Monday evening, police said. It happened on the 12000 block of Loring Street on Detroit’s east side.

Detroit Police Commander Eric Decker said the boy’s condition was upgraded after he underwent surgery. He described the shooting as a “very unfortunate accident.” Decker said the weapon wasn’t secured.

“We have to be more diligent keeping our weapons away from children,” he said. Police said the child’s par-

MICHAEL E. DUGGAN, MAYOR CITY OF DETROIT

HOUSING AND REVITALIZATION DEPARTMENT

NOTICE OF REQUEST FOR 2019-2020 COMMUNITY DEVELOPMENT BLOCKGRANT (CDBG) NEIGHBORHOOD OPPORTUNITY FUND (NOF) PROPOSALS, CDBG/NOF WORKSHOP AND CONSOLIDATED PLAN PUBLIC HEARING

The City of Detroit invites community organizations and others to submit proposals for projects to be funded by the 2019-2020 Community Development Block Grant/Neighborhood Opportunity Fund (CDBG/NOF) program.

All community organizations, including neighborhood residents, business organizations, block clubs, human service organizations, etc. who wish to participate in the development and implementation of either CDBG or NOF projects as advisors and/or as operating agencies may submit proposals.

This year all 2019-2020 CDBG/NOF proposals must be prepared and submitted online using the City’s “BidSync” system. Proposal applicants must register on BidSync before a proposal can be submitted. Proposals must be submitted via BidSync by 4:00 pm on Monday, October 1, 2018. Paper copies of Proposals will not be accepted. To obtain information regarding BidSync, go to www.bidsync.com.

Proposals submitted by the Monday, October 1, 2018, deadline will be evaluated by City agencies. Late proposals will not be accepted. Funding approval, for proposals, will be determined by the Mayor and City Council.

The 2019-2020 CDBG/NOF proposal packages with the required proposal forms will be available via BidSync on Friday, August 31, 2018.

ONSITE CDBG/NOF WORKSHOP

The Housing and Revitalization Department (HRD) in conjunction with the City Planning Commission (CPC) will conduct two CDBG/NOF “Proposal Workshops” to be held as shown below:

Onsite Workshops	Proposal Workshop 1	Proposal Workshop 2
	Saturday, August 18, 2018, from 10 A.M. to 1 P.M. (Registration begins at 10:00 A.M.)	Wednesday, September 12, 2018, from 5 P.M. to 8 P.M. (Registration begins at 5:00 P.M.)
Focus: HOPE 1400 Oakman Blvd Detroit, MI 48238	Samaritan Center 5555 Connor St. #2210 Detroit, MI 48234	

Workshop registration information can be obtained by calling: (313) 224-6380.

Workshop materials will be available on the City’s website at <http://www.detroitmi.gov/hard> from there click on, Archives/Reports/Resources, on August 18, 2018. The workshops are designed to help community groups and others prepare their CDBG/NOF proposals. According to proposal criteria, a community group representative must

attend to attending a workshop to be eligible for funding (see proposal signature page).

BACKGROUND

The HUD Consolidated Plan is a five year strategic plan, updated annually, describing the needs, conditions, objectives, priorities, strategies, and action programs related to community development, affordable housing, the homeless, and housing for persons with special needs, including persons living with HIV and AIDS. The plan is required so the City may receive funds from certain HUD programs. The plan contains the annual funding applications for the following HUD programs:

- Community Development Block Grant (CDBG)/Neighborhood Opportunity Fund (CDBG)/(NOF)
- HOME Investment Partnership (HOME)
- Emergency Solutions Grant (ESG)
- Housing Opportunities For Persons With Aids (HOPWA)

The City’s current Consolidated Plan covers the period from 2015-2019. The City is in the process of preparing its 2019-2020 Annual Action Plan update. The 2019-2020 Annual Action Plan is the fourth year of the 2015-2019 Consolidated Plan.

At least one public hearing is held each year to obtain citizen input necessary for Consolidated Plan development. This year the first meeting will be held as shown below:

Public Hearing 1
Thursday, October 25, 2018 4:30 PM – 6:30 PM Coloman A. Young Municipal Center (CAYMC) Housing & Revitalization Department 2 Woodward Ave. Suite 908 Detroit, MI 48226

During the public hearings, HRD staff will describe the contents of past plans and the types of activities that may be undertaken using 2019-2020 Annual Action Plan programs. Hearing participants are given an opportunity to ask questions and present their opinions regarding Consolidated Plan processes and activity types that can be included in the Annual Action Plan. The hearing will focus on these matters and is not held to discuss funding for particular organizations. Citizens may also submit comments by letter (at the address shown below), appointment, telephone or email at ConPlanComments@detroitmi.gov on or before May 15, 2019. This notice will be posted on the following City of Detroit website at: <http://www.detroitmi.gov/hard> from there click on, Archives/Reports/Resources

For further information, contact:

Tamara E. Hardy

Housing and Revitalization Department

2 Woodward Avenue
Detroit, MI 48226
Telephone: 313-224-6380

Persons with disabilities who require special accommodations, auxiliary aids, or services to participate in these hearings, should contact the Housing and Revitalization Department. Reasonable advance notice of such needs is required.

Notice of Non-Discrimination: The City of Detroit does not discriminate on the basis of race, color, creed, national origin, age, handicap, sex or sexual orientation. Complaints may be filed with the Detroit Human Rights Department, Coloman A. Young Municipal Center, Detroit, Michigan.

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City of Detroit
Housing & Revitalization Department
Public Hearing 2
2019-20 Action Plan
Record of Public Hearing

Purpose: To receive citizen comments on the 2019-20 Draft Action Plan

Participants: **REPORTING AND COMPLIANCE DIVISION**

Warren T. Duncan
Jennifer Mahone
Marlene Robinson

Citizen Participants

4 individuals
1 email from individual

Location: Housing and Revitalization Department
Coleman A. Young Municipal Center
2 Woodward Avenue, Suite 908
Detroit, MI 48226

Date & Time: June 26, 2019 4:30 pm – 6:00 pm

Summary:

The Housing & Revitalization Department staff conducted the hearing. Mr. Duncan provided hand-outs of the Annual Action Plan process, the 2019-20CDBG, ESG, HOME and HOPWA grants, 2019-20 actual CDBG/NOF sub-recipient awards and program descriptions. Citizens were able to review the 2019-20 draft Annual Action Plan. There were 3 individual citizens and H&RD staff in attendance.

There were 4 citizens that had questions/comments.

Question/Comment 1:

There is a need for grass removal, tree trimming and sidewalk repair in the Crary-St. Marys Community Council area. The streets are Hemlock, Mansfield and Rutherford. In addition, there is an electricity connection that is suspect.

Response to Question/Comment 1:

The citizen was provided City of Detroit hotlines for sidewalk repair (DPW), tree trimming (General Services) and grass removal (Environmental Control). The citizen was also provided the telephone number to DTE for the electrical connection.

Question/Comment 2:

There should be more affordable housing in the Mid-town area. Why not?

Response to Question/Comment 2:

The citizen was provided a copy of the 2018 Multi-family affordable housing strategy book for review. The booklet discuss housing initiatives over the next five year.

Question/Comment 3 (received via telephone):

How can a citizen apply for the Zero Percent home repair loan? I have no insurance because I need a roof.

Response to Question/Comment 3:

The citizen was provided a copy of the brochure for the Zero Percent home repair loan. The citizen was recommended to contact the financial institution who approves the loan to discuss her situation.

Question/Comment 4 (received via email):

The citizen requested information to be sent to her from the public hearing.

Response to Question/Comment 4:

The citizen received a reply from HRD. The information from the 2019-2020 Draft Action Plan public hearing would be emailed to citizen.

City of Detroit
Housing & Revitalization Department
CDBG Subrecipient Workshops
2019-20 Annual Action Plan
Record of Public Meetings

Purpose: To receive responses on process improvements and provide technical CDBG subrecipients.

Participants: **Neighborhood Opportunity Fund**
Tamra Fontaine
Gordon Pearson
Mandy Valentine
Kerry Baitinger
Sandra O'Neal

Citizen Participants (non-profit organization)
607 individuals

Location: Various locations

Dates: August 17 and 18, September 12, 2018; March 1, May 9, and June 10, 2019

Summary:

The Housing & Revitalization Department staff conducted the CDBG proposal and technical assistance workshops. Neighborhood residents, block clubs and community organizations who wish to participate in the development and implementation of CDBG projects; and apply for funding are invited to the workshops. The workshops focused on data collection, reimbursement procedure, clearances, best practices and the proposal evaluation procurement processes.

Question/Comment:

At the workshops various persons asked questions and made comments. Interest consisted of developing an understanding of data collection, reimbursement process, income tax clearance, evaluation and procurement process; and how to measure impact.

Response to Question/Comment:

During each specific workshop there is a question and answer (Q & A) session. H&RD staff responded to all questions.

City of Detroit
Housing & Revitalization Department
CDBG Subrecipient Workshops
2019-20 Annual Action Plan
Record of Public Meetings

Purpose: To receive responses on process improvements and provide technical ESG subrecipients.

Participants: **Emergency Solution Grant**
Meghan Takashima
Sherida Person
Sarmed Jabra
Terra Linzier

Citizen Participants (non-profit organization)
40 individuals

Location: Focus HOPE, 1400 Oakman Blvd, Detroit, MI 48238

Dates: May 21 and 22, 2019

Summary:

The Housing & Revitalization Department staff conducted the ESG proposal and technical assistance workshops. Community organizations who wish to participate in the development and implementation of ESG projects; and apply for funding are invited to the workshops. The workshops focused on data collection, reimbursement procedure, clearances, best practices and the proposal evaluation procurement processes.

Question/Comment:

At the workshops various persons asked questions and made comments. Interest consisted of HUD regulations, understanding of data collection, reimbursement process, income tax clearance, evaluation and procurement process.

Response to Question/Comment:

During each specific workshop there is a question and answer (Q & A) session. H&RD staff responded to all questions.

Metro

Divine Child High School students protest ‘modesty’ lesson

Dixita Limbachia Detroit Free Press
USA TODAY NETWORK

A Catholic high school in Dearborn that stirred controversy last year for a plan to pass out “modesty ponchos” at prom is under fire again for allegedly shaming some girls for the way they dress.

According to students, a campus life minister at Divine Child High School conducted a lesson on sexual harassment recently. The minister told students that girls are sometimes to blame for unwanted attention because of the way they dress.

Afterward, about 40 girls protested the lesson by wearing paper targets on their uniforms and put up posters that read: “Instead of publicly shaming girls for dressing how they want, teach men not to over-sexualize women’s bod-

ies.” This statement was accompanied with a bible verse at the bottom from Matthew 5:28.

Students said school administrators threatened detention to those students who refused to remove the paper targets from their uniforms.

School official released the following statement:

“Administration at Divine Child High School recently became aware of concerns from some students about a recent presentation given to all ninth-graders, over the course of May 28-31, covering students’ rights, responsibilities, and situations they may face while participating in Christian service opportunities.

“Our students’ comfort, safety, and well-being are paramount to their experience at Divine Child High School, and we are taking all concerns seriously. To that end, we have discussed

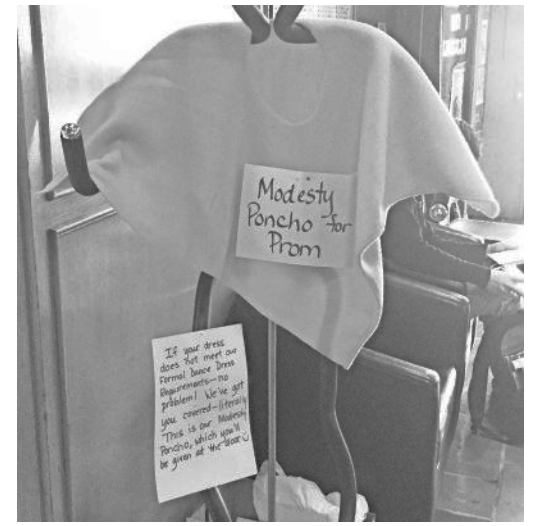
these concerns with some students and parents and welcome input from all of our stakeholders. School administration has no record of students being suspended, issued detentions or otherwise disciplined as a result of this situation.

“While we are confident in the message and value of the program, this input from our community has and will help us continue to improve our delivery of this important information to our students.”

Students and parents at Divine Child High School declined to comment on the matter Tuesday.

Last year, the Catholic school faced scrutiny for its plan to hand out modesty ponchos at prom to girls whose dresses were deemed too revealing.

That idea was quickly abandoned.



An idea last year at Divine Child High School to give a “modesty poncho” to girls whose prom dresses were deemed too revealing was abandoned. ERIN WADE/SPECIAL TO FREE PRESS

**CITY OF DETROIT
HOUSING AND REVITALIZATION DEPARTMENT
MICHAEL E. DUGGAN, MAYOR
SUMMARY AND NOTICE OF PUBLIC HEARING ON
2019-2020 DRAFT ACTION PLAN**

The City of Detroit through its Housing and Revitalization Department (HRD) will conduct a public hearing regarding the 2019-2020 Draft Action Plan. The meeting is scheduled for Wednesday, Jun 26, 2019 from 4:30 PM to 6:00 PM at the following location:

**Coleman A. Young Municipal Center (CAYMC)
Housing and Revitalization Department
2 Woodward Avenue, Suite 908
Detroit, MI 48226**

INFORMATION AND PUBLIC REVIEW

This notice provides a summary of the 2019-2020 Draft Action Plan. The Draft Action Plan funding recommendations will be available for public review beginning June 26, 2019 to July 26, 2019 in the offices of the Housing and Revitalization Department and online at: <http://www.detroitmi.gov/hrd> Click on HUD Consolidated Plan, Action Plans & CAPERS.

At the public hearing, citizens may obtain information and submit comments regarding the 2019-2020 Draft Action Plan. Citizens may also submit comments by letter (at the address shown below), appointment, telephone, or by e-mail at ConPlanComments@detroitmi.gov on or by July 26, 2019. For further information, please contact:

**W. T. Duncan
Housing and Revitalization Department
2 Woodward Avenue, Suite 908
Detroit, MI 48226
Telephone: (313) 224-0315**

BACKGROUND

The 2015-2019 HUD Consolidated Plan is a five-year Strategic Plan with annual Action Plan updates. The Strategic Plan describes the needs, conditions, goals, objectives, priorities, strategies, resources and programs related to community development, affordable housing, the homeless, and persons with special needs, including persons living with HIV/AIDS. The 2019-2020 program year marks the fifth and final annual Action Plan update for the 2015-2019 Consolidated Plan.

The Draft 2019-2020 Action Plan is the City of Detroit’s annual funding application for the following HUD funded programs:

- Community Development Block Grant (CDBG)
- HOME Investment Partnership (HOME)
- Emergency Solutions Grant (ESG)
- Housing Opportunities For Persons With AIDS (HOPWA)

SUMMARY OF THE 2015-2019 HUD CONSOLIDATED PLAN AND 2019-2020 DRAFT ACTION PLAN CONTENTS

The HUD Consolidated Plan contains the following major sections with discussions following:

- Executive Summary
- Needs Assessment
- Strategic Plan
- Certifications
- The Process
- Market Analysis
- Annual Action Plan

EXECUTIVE SUMMARY

The Executive Summary includes a summary of objectives, outcomes, and major sections identified in the plan.

THE PROCESS

The Process section summarizes responsible agencies, consultation process and citizen participation.

NEEDS ASSESSMENT

The Needs Assessment section discusses housing needs (i.e. low and moderate income housing problems) and Public Housing needs. This section will also include homeless, non-homeless special needs assessments, and non-housing community development needs.

MARKET ANALYSIS

The Market Analysis section includes the following discussions:

- Number of Housing Units
- Condition of Housing
- Homeless Facilities
- Barriers to Affordable Housing
- Needs and Market Analysis Discussion
- Cost of Housing
- Public and Assisted Housing
- Special Needs Facilities and Services
- Non-Housing Community Development Assets

STRATEGIC PLAN

The Strategic Plan includes the following discussions:

- Geographic Priorities
- Influence of Market Conditions
- Institutional Delivery Structure
- Public Housing Accessibility and Involvement
- Homelessness Strategy
- Anti-Poverty Strategy
- Priority Needs
- Anticipated Resources
- Goals
- Barriers to Affordable Housing
- Lead Based Paint Hazards
- Monitoring

ANNUAL ACTION PLAN

The Annual Action Plan includes the following discussions:

- Expected Resources
- Projects
- Affordable Housing
- Homeless & Other Special Needs
- Barriers to Affordable Housing
- Program Specific Requirement
- Annual Goals and Objectives
- Geographic Distribution
- Public Housing
- HOPWA Goals
- Other Actions

FEDERAL RESOURCES

City of Detroit Action Plan revenues for 2018-2019 and revenues for 2019-2020 are shown below:

Program	2018-2019 Revenue	2019-2020 Revenue
CDBG Entitlement	\$34,379,413	\$34,516,333
CDBG Program Income	\$0	\$0
CDBG Other Revenues	\$0	\$0
CDBG Subtotal	\$34,379,413	\$34,516,333
HOME	\$7,243,157	\$6,737,568
HOME Program Income	\$0	\$0
ESG	\$2,816,974	\$2,917,168
HOPWA	\$2,723,332	\$2,825,867
Grand Total	\$47,162,876	\$46,996,936

2019-2020 DRAFT ACTION PLAN FUNDING RECOMMENDATIONS

Listed below are the Mayor’s 2019-2020 draft recommendations by program categories for CDBG, ESG, HOME, and HOPWA grants.

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)			HOME INVESTMENT PARTNERSHIP		
Activity Category		2019-2020 Draft Allocations	Activity Category		2019-2020 Draft Allocations
ADMIN AND PLANNING (ADPLN)	ADPLN	\$6,549,046	ADMIN AND PLANNING (ADPLN)	ADPLN	\$673,757
DEMOLITION (DEMO)	DEMO	\$2,320,000	HOME Projects		\$6,063,811
ECONOMIC DEVELOPMENT (ED)	ED	\$1,000,000	Program Income	PI	\$0
HOMELESS PUBLIC SERVICE (HPS)	HPS	\$2,475,417			
HOME REPAIR (HR)	HR	\$7,738,975			
PUBLIC FACILITY REHAB (PFR)	PFR	\$400,000			
PUBLIC SERVICE	PS	\$5,423,649			
DEVELOPMENT	DVLPT	\$2,728,387			
SECTION 108 LOANS (REPAY)	Repay	\$5,880,859			
TOTAL CDBG		\$34,516,333	TOTAL HOME		\$6,737,568

EMERGENCY SOLUTIONS GRANTS (ESG)			HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS (HOPWA)		
Activity Category		2019-2020 Draft Allocations	Activity Category		2019-2020 Draft Allocations
ADMIN AND PLANNING (ADPLN)	ADPLN	\$218,788	ADMIN AND PLANNING (ADPLN)	ADPLN	\$84,776
ESG Projects		\$2,698,380	HOPWA Projects		\$ 2,741,091
TOTAL ESG		\$2,917,168	TOTAL HOPWA		\$2,825,867

Important Note: These Recommendations Are Subject To The Approval Of The Detroit City Council And The U.S. Department Of Housing And Urban Development (HUD). City Council May Change The Amounts, Add Projects And Activities, Or Delete Projects And Activities. In Addition, HUD May Set Conditions on the Use of These Funds.

NOTICE OF NON-DISCRIMINATION: The City of Detroit does not discriminate on the basis of race, color, creed, national origin, age, handicap, sex or sexual orientation. Discrimination complaints may be filed with the City of Detroit, Civil Rights, Inclusion & Opportunity Department 2 Woodward Suite 1240 Coleman A. Young Municipal Center, Detroit, Michigan 48226

APPENDICES:

2019-2020 Action Plan Budget:

2019-2020 HUD Annual Action Plan Projects and Activities

Program Name	Activity	National Objective	Matrix Code	Sponsor Name (Activity Name)	Recommended Amount	Project Description	Site Address	Start Date	Completion Date	Objective	Outcome	Specific Objectives	Accomplishment Type	Proposed Accomplishment	Outcome Indicators	Priority Need	City wide	NRSA	Slum Blight	City Districts	
CDBG	PS	LMA	05D	Public Service - Summer Jobs Program (NRSA 1)	1,480,874.00	Public service program that will provide job training and employment opportunities for "at risk" and other low income youth in selected Neighborhood Revitalization Strategy areas (NRSA) through programs designed to stabilize deteriorated or deteriorating neighborhoods.	2 Woodward CAYMC, Detroit, MI 48226	7/1/2019	6/30/2020	Creating Economic Opportunities	Availability/Accessibility	Improve economic opportunities for LMI persons	People	500	Public Service	Public Services			1 thru 5		
CDBG	PS	LMA	05H	DESC Training Program (NRSA)	1,500,000.00	Public service program that will provide job training and employment opportunities for "at risk" and other low income youth in selected Neighborhood Revitalization Strategy areas (NRSA) through programs designed to stabilize deteriorated or deteriorating neighborhoods.	2 Woodward CAYMC, Detroit, MI 48226	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	300	Public Service	Public Services			1 thru 5		
CDBG	PS	LMC	05C	Accounting Aid Society	77,507.00	To provide free tax preparation and counseling assistance to Low/Mod income Detroit households; provides education in financial management.	7700 Second Ave Suite 314 Detroit, MI 48202	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	11000	Public service activities other than low/moderate-income housing benefit	Public Services	X				
CDBG	PS	LMC	05D	Alkebu-lan Village	71,507.00	Building positive leaders emphasizes placed on mental, moral and physical (Marial) development with culturally-affirming content. Youth K-12 after school program. Recreation/media arts and design/drama/dance and sports.	7701 Harper Ave. Detroit, MI 48213	7/1/2018	6/30/2019	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	120	Public service activities other than low/moderate-income housing benefit	Public Services					6
CDBG	PS	LMC	05D	Boys and Girls Club of Southeastern Michigan	67,507.00	Academic Success Program including homework help, tutoring, and other after school activities. To operate at all 4 city of Detroit Boys & Girls club sites	16500 Tireman Detroit, MI 48228	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	1000	Public service activities other than low/moderate-income housing benefit	Public Services	X				
CDBG	PS	LMC	05H	Center for Employment Opportunities	67,507.00	CEO program aim to reduce recidivism and improve employment outcomes for people returning home from incarceration	7300 Woodward Ave. Detroit, MI 48202	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	325	Public service activities other than low/moderate-income housing benefit	Public Services	X				
CDBG	PS	LMC	05D	Cody Rouge Community Action Alliance	71,507.00	Cody Rouge Youth Services Council promotes personal development of the neighborhood's youth by providing them with opportunities to engage in authentic decision-making and strong adult-youth partnerships through recreational programming.	19321 W. Chicago Detroit, MI 48228	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	525	Public service activities other than low/moderate-income housing benefit	Public Services					7
CDBG	PS	LMC	05D	Coleman A. Young Foundation	61,507.00	After school program for youth 6-12, Leadership development, parents workshop, life skills, instill confidence in Detroit students, Real Skills 2.0 after school program.	7650 2nd Ave Suite 206, Detroit, MI 48202	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	392	Public service activities other than low/moderate-income housing benefit	Public Services					5
CDBG	PS	LMC	05D	Detroit Area Pre-College Engineering Program (DAPCEP)	67,507.00	Program provides nationally recognized enrichment programs in science technology, engineering, and mathematics.	42 W. Warren Detroit, MI 48202	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	200	Public service activities other than low/moderate-income housing benefit	Public Services	X		ALL	ALL	ALL
CDBG	PS	LMC	05A	Delray United Action Council	61,507.00	Community based programs for residents of Southwest Detroit with emphasis on the senior population, i.e. community transportation, community food distribution, senior adult day care, nutritional classes, utility assistance (THAW) for low income families, and health screenings.	275 West Grand Blvd. Detroit MI 48216	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	115	Public service activities other than low/moderate-income housing benefit	Public Services	X				

2019-2020 HUD Annual Action Plan Projects and Activities

Program Name	Activity	National Objective	Matrix Code	Sponsor Name (Activity Name)	Recommended Amount	Project Description	Site Address	Start Date	Completion Date	Objective	Outcome	Specific Objectives	Accomplishment Type	Proposed Accomplishment	Outcome Indicators	Priority Need	City wide	NRSA	Slum Blight	City Districts
CDBG	PS	LMC	05D	Detroit Police Athletic League	76,507.00	Youth mentoring program through organized sports programs funds to support the following programs: youth baseball, softball, track, recreational soccer and the GOAL Detroit Soccer program.	111 West Willis Detroit MI 48201	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	2241	Public service activities other than low/moderate-income housing benefit	Public Services	X			
CDBG	PS	LMC	05H	Dominican Literacy Ctr	77,507.00	Adult Basic Education Program provides one to one tutoring, small group instruction, computer based learning and GED education.	555 Conner Ave Suite 1414 Detroit, MI 48213	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	135	Public service activities other than low/moderate-income housing benefit	Public Services		2		4
CDBG	PS	LMC	05H	Focus HOPE	62,507.00	Preparing unemployed and under-employed Detroiters for information technology jobs, creating greater economic self-sufficiency. Contextualized work readiness training aimed at earning industry certifications	1200 Oakman Blvd Detroit, MI 48238	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	300	Public service activities other than low/moderate-income housing benefit	Public Services				2.5
CDBG	PS	LMC	05M	Greater Detroit Agency for the Blind and Visually Impaired (GDABVI)	66,507.00	Provides "in-home" rehab therapy, mobility training and group support for the visually impaired.	16625 Grand River Ave. Detroit, MI 48227	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	130	Public service activities other than low/moderate-income housing benefit	Public Services				1
CDBG	PS	LMC	05C	International Institute of Metropolitan Detroit	77,537.00	Low/Mod to assist immigrants and non-immigrants with immigration issues, legal, GED, Financial Literacy, Career Development.	111 East Kirby Detroit, MI 48202	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	1800	Public service activities other than low/moderate-income housing benefit	Public Services		2.3,5	2	4,5,6,7
CDBG	PS	LMC	05I	Jefferson East Business Association	61,507.00	Support SAFE Jefferson to increase security and reduce crime within the Jefferson corridor/identify crime hot spots/auto clubs and wheel locks/10,000 residents impacted.	300 River Place Drive, Suite 5250 Detroit MI, 48207	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	3864	Public service activities other than low/moderate-income housing benefit	Public Services		1		3, 4, 6
CDBG	PS	LMC	05M	Joy-Southfield CDC	81,507.00	HEART Detroit program provides free health promoting resources, preventive health education, chronic disease management, community-based wellness promotion and increased access to affordable healthy food.	18917 Joy Road Detroit MI 48228 18900 Joy Rd. 48228 Zip: 48228_	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	1500	Public service activities other than low/moderate-income housing benefit	Public Services		5	1	7
CDBG	PS	LMC	05A	L&L Adult Day Care	61,507.00	Adult Day Care includes transportation and daily exercise regimen to those over 60-years of age or older who have developmental disabilities, mental illness, Alzheimer's, dementia or who are veterans.	1485 East Outer Drive Detroit MI 48234	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	25	Public service activities other than low/moderate-income housing benefit	Public Services	X			
CDBG	PS	LMC	05A	Latin Americans for Social and Economic Development (LASED)	71,507.00	Transportation, food assistance, and help in obtaining access to other vital services and wellness.	4138 W. Vernor Hwy. Detroit MI 48209	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	250	Public service activities other than low/moderate-income housing benefit	Public Services		1		5
CDBG	PS	LMC	05A	Luella Hannan Memorial	71,507.00	Zena Baum Senior Service Center helps seniors access programs and services they need to age in place, improve physical and emotional health, and remain independent.	4750 Woodward Detroit MI 48201	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	300	Public service activities other than low/moderate-income housing benefit	Public Services	X			
CDBG	PS	LMC	05D	Matrix Human Services	71,507.00	Providing services to Seniors to increase self-sufficiency in their home. Services include access to direct services, nutritional and emergency food assistance, transportation services, and medical services	13560 E. Menichols Detroit MI 48205	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	150	Public service activities other than low/moderate-income housing benefit	Public Services	X			
CDBG	PS	LMC	05D	Mercy Education Project	67,507.00	Mercy Education Project provides educational opportunities, life skillsdevelopment, and cultural enrichment to help at-risk girls and women in southwest Detroit improve their quality of lives.	1450 Howard Street Detroit MI 48216	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	150	Public service activities other than low/moderate-income housing benefit	Public Services				5

2019-2020 HUD Annual Action Plan Projects and Activities

Program Name	Activity	National Objective	Matrix Code	Sponsor Name (Activity Name)	Recommended Amount	Project Description	Site Address	Start Date	Completion Date	Objective	Outcome	Specific Objectives	Accomplishment Type	Proposed Accomplishment	Outcome Indicators	Priority Need	City wide	NRSA	Slum Blight	City Districts
CDBG	PS	LMC	05M	My Community Dental Center (MCDC)	61,507.00	Provides free dental services, including surgery, fillings, full and partial dentures to low/mod residents, free prescriptions to low income patients in need of continuous medications.	3000 Gratiot Ave. Detroit MI 48207	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	4200	Public service activities other than low/moderate-income housing benefit	Public Services				5
CDBG	PS	LMC	05C	Neighborhood Legal Services (Wayne County)	61,507.00	To provide comprehensive case management services, including legal representation and shelter for up to 36 victims of human trafficking.	7310 Woodward Ave. Suite301 Detroit MI 48202	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	36	Public service activities other than low/moderate-income housing benefit	Public Services	X			
CDBG	PS	LMC	05H	Ser Metro	61,507.00	Educational and Workforce Development program. Adult Basic Education programs provides Detroit youth and adults education in literacy, numeracy, and science	9301 Michigan Ave Detroit, MI 48210	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	180	Public service activities other than low/moderate-income housing benefit	Public Services				6
CDBG	PS	LMC	05D	Siena Literacy Center	62,507.00	Expansion of services to include Fridays and some Saturdays. Addresses Adult Literacy, reading, writing, mathematics and digital literacy.	16888 Trinity Detroit MI 48219	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improve the services for low/mod income persons	People	104	Public service activities other than low/moderate-income housing benefit	Public Services				1
CDBG	PS	LMC	05D	Southwest Detroit Business Association	61,507.00	Serving youth ages 11 through 18 in music arts classes in three schools (Maybury Elementary, Erahart Middle and Western High).	7752 West Vernor Hwy. Suite 101 Detroit MI 48209	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improve the services for low/mod income persons	People	150	Public service activities other than low/moderate-income housing benefit	Public Services		3		6
CDBG	PS	LMC	05A	St. Patrick Senior Center	81,507.00	Assist seniors in remaining independent by providing health & wellness programs, daily home cooked meal program, transportation services, health care advocacy and in-home support services.	58 Parsons Street Detroit MI 48201	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improve the services for low/mod income persons	People	900	Public service activities other than low/moderate-income housing benefit	Public Services	X			
CDBG	PS	LMC	05H	St. Vincent and Sarah Fisher Ctr.	77,507.00	St. Vincent and Sara Fisher Center offers preparation for successful completion of the GED exam and assist residents to become economically self sufficient / Offered to adults 18 years and older/ 400-participants.	16800 Trinity Detroit MI 48219	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improve the services for low/mod income persons	People	350	Public service activities other than low/moderate-income housing benefit	Public Services	X			
CDBG	PS	LMC	05D	Teen Hype	81,507.00	Peer education through performing arts program, helps people gain valuable knowledge and skills to stay safe socially and sexually, community service projects; artistic mediums of photography, dance, spoken word, theatre and music.	1319 E. Woodbridge Detroit MI 48207	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improve the services for low/mod income persons	People	2000	Public service activities other than low/moderate-income housing benefit	Public Services	X			
CDBG	PS	LMC	05D	The Youth Connection	62,507.00	Train youth 14-24 for careers and develop "home-grown" heroes. Provide quality youth programming in environmental conservation, outdoor recreation, community service projects and on the job training.	4777 East Outer Drive Detroit MI 48234	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improve the services for low/mod income persons	People	250	Public service activities other than low/moderate-income housing benefit	Public Services	X			
CDBG	PS	LMC	05M	The Yunion	81,507.00	HIV prevention program to address and decrease HIV infection among African-American women and girls.	11 East Kirby Detroit MI 48207	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improve the services for low/mod income persons	People	450	Public service activities other than low/moderate-income housing benefit	Public Services	X			
CDBG	PS	LMA	05D	Urban Neighborhood Initiative	77,507.00	To support out-of-school education for youth ages 5-13/after school and summer enrichment programs/ sports/ STEM, art, computer.	8300 Longworth Detroit MI 48209	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improve the services for low/mod income persons	People	200	Public service activities other than low/moderate-income housing benefit	Public Services				6

2019-2020 HUD Annual Action Plan Projects and Activities

Program Name	Activity	National Objective	Matrix Code	Sponsor Name (Activity Name)	Recommended Amount	Project Description	Site Address	Start Date	Completion Date	Objective	Outcome	Specific Objectives	Accomplishment Type	Proposed Accomplishment	Outcome Indicators	Priority Need	City wide	NRSA	Slum Blight	City Districts
CDBG	PS	LMA	05D	Warren Conner Development Coalition	62,507.00	Youth on Edge College readiness program that exposes first generation students to college selection and application process to increase interest and preparation for successfully submitting application	4401 Conner Detroit, MI 48215	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improve the services for low/mod income persons	People	140	Public service activities other than low/moderate-income housing benefit	Public Services				4
CDBG	PS	LMC	05D	Wellspring	77,507.00	The program uses the Kumon math & reading/language arts curriculum and supplements it with such components as college prep, community service, leadership development & adventure experiences.	16742 Lamphere Detroit MI 48219	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improve the services for low/mod income persons	People	200	Public service activities other than low/moderate-income housing benefit	Public Services				1
CDBG	PS	LMC	05M	World Medical Relief	71,507.00	Provides prescription medication to individuals 18 years or older in the City of Detroit who have low to moderate incomes and do not have the financial resources or insurance to pay retail prices for their medicines.	21725 Melrose Southfield MI 48075	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improve the services for low/mod income persons	People	200	Public service activities other than low/moderate-income housing benefit	Public Services	X			
CDBG	PS	LMC	05D	YMCA	67,507.00	The program provides college and career preparation for Detroit youth, by way of summer youth employment , along with a special emphasis on healthy eating, cultural and social development.	1401 Broadway Suite 3A, Detroit, MI 48226	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	Improve the services for low/mod income persons	People	400	Public service activities other than low/moderate-income housing benefit	Public Services				5
					5,423,649.00	Subtotal Public Service														
CDBG	PSHL	LMC	03T	Alternatives For Girls (ES)	68,906.25	(ES) Provides shelter for young women.	903 West Grand Blvd. Detroit MI 48208	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	100	Homeless person overnight shelter	Emergency shelter and transitional housing	X			
CDBG	PSHL	LMC	03T	Cass Community Social Services (ES)	78,750.00	Provide rotating shelter for adults and family shelter.	11850 Woodrow Wilson, Detroit MI 48206	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	440	Homeless person overnight shelter	Emergency shelter and transitional housing	X			
CDBG	PSHL	LMC	03C	Cass Community Social Services (SO)	75,000.00	Outreach program outside business hours focused on unsheltered persons.	11745 Rosa Parks Blvd. Detroit MI 48206	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	100	Homeless person overnight shelter	Outreach	X			
CDBG	PSHL	LMC	03T	Cass Community Social Services (Wm Ctr)	105,000.00	Warming shelter for homeless men, women and children.	11745 Rosa Parks Blvd. Detroit MI 48206	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	1000	Homeless person overnight shelter	Emergency shelter and transitional housing	X			
CDBG	PSHL	LMC	03C	Central United Methodist/NOAH (SO)	100,000.00	NOAH lunch program and engagement for homeless and unsheltered persons.	23 East Adams Detroit MI 48226	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	2527	Homeless person overnight shelter	Outreach	X			
CDBG	PSHL	LMC	03T	Coalition on Temporary Shelter (COTS) (ES)	98,437.50	Provides shelter for families (male, female and children).	26 Peterboro Detroit MI 48201	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	16	Homeless person overnight shelter	Emergency shelter and transitional housing	X			
CDBG	PSHL	LMC	03T	Community Social Services of Wayne County (ES)	39,375.00	Shelter provider for pregnant or parenting Detroit teens and their children.	9851 Hamilton Detroit MI 48202	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	1416	Homeless person overnight shelter	Emergency shelter and transitional housing	X			

2019-2020 HUD Annual Action Plan Projects and Activities

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CDBG	PSHL	LMC	03T	Covenant House (ES)	64,125.00	Provides shelter for teens 18-24 years of age.	2959 MLK Blvd. Detroit MI 48208	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	50	Homeless person overnight shelter	Emergency shelter and transitional housing	X			
CDBG	PSHL	LMC	03T	DRMM Genesis II Chicago (ES)	52,987.50	Provides shelter for women and families	12900 Chicago W, Detroit, MI 48227	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	50	Homeless person overnight shelter	Emergency shelter and transitional housing	X			
CDBG	PSHL	LMC	03T	DRMM Genesis House III Fairview (ES)	51,468.75	Provides shelter for women and children.	3840 Fairview, Detroit, MI 48214	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	50	Homeless person overnight shelter	Emergency shelter and transitional housing	X			
CDBG	PSHL	LMC	03T	DRMM Genesis House III Fairview (Wm Ctr)	107,999.96	Warming center for families.	3840 Fairview, Detroit, MI 48214	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	1000	Homeless person overnight shelter	Emergency shelter and transitional housing	X			
CDBG	PSHL	LMC	03T	DRMM 3rd Street (ES)	62,437.50	Provides shelter for men	3535 Third Ave, Detroit, MI 48201	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	1000	Homeless person overnight shelter	Emergency shelter and transitional housing	X			
CDBG	PSHL	LMC	03T	DRMM 3rd Street (Wrm Ctr)	75,000.00	Warming center for homeless men.	3535 Third Ave, Detroit, MI 48201	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	1000	Homeless person overnight shelter	Emergency shelter and transitional housing	X			
CDBG	PSHL	LMC	03T	Freedom House (ES)	37,500.00	Provides services to political refugees.	Suppressed	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	106	Homeless person overnight shelter	Emergency shelter and transitional housing	X			
CDBG	PSHL	LMC	05Q	Legal Aid & Defender (HP)	75,000.00	Counseling and financial assistance for those at-risk of homelessness.	613 Abbott Detroit MI 48226	7/1/2019	6/30/2020	Decent Housing	Affordability	End Chronic Homelessness	People	150	Homelessness prevention	Prevention	X			
CDBG	PSHL	LMC	05U	Michigan Legal Services (FP)	150,000.00	Provide foreclosure prevention services to Detroit residents at risk of foreclosure	2727 Second Ave., Detroit MI 48201	7/1/2019	6/30/2020	Decent Housing	Affordability	End Chronic Homelessness	People	150	Homelessness prevention	Foreclosure Prevention	X			
CDBG	PSHL	LMC	05S	Neighborhood Legal Services Michigan (Wayne County) (RR)	159,371.50	Quickly rehouse families and individuals that are literally homeless.	7310 Woodward Suite 701 Detroit MI 48202	7/1/2019	6/30/2020	Decent Housing	Affordability	End Chronic Homelessness	People	175	Tenant-based rental assistance/Rapid rehousing	Rapid Re-housing	X			
CDBG	PSHL	LMC	03T	Neighborhood Service Organization (ES)	68,906.25	Shelter provider for single adults	3430 Third St, Detroit MI 48201	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	100	Homeless person overnight shelter	Emergency shelter and transitional housing	X			
CDBG	PSHL	LMC	05U	Neighborhood Service Organization (SO)	75,000.00	Navigation to assist persons experiencing chronic homelessness to obtain housing	3431 Third St, Detroit MI 48201	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	100	Homeless person overnight shelter	Outreach	X			
CDBG	PSHL	LMC	03T	Operation Get Down (ES)	37,500.00	Provides shelter for men.	10100 Harper Ave Detroit, MI 48213	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	75	Homeless person overnight shelter	Emergency shelter and transitional housing	X			
CDBG	PSHL	LMC	03T	Salvation Army (ES)	67,500.00	Provides shelter for homeless families.	3737 Lawton St, Detroit MI 48208	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	100	Homeless person overnight shelter	Emergency shelter and transitional housing	X			

2019-2020 HUD Annual Action Plan Projects and Activities

Program Name	Activity	National Objective	Matrix Code	Sponsor Name (Activity Name)	Recommended Amount	Project Description	Site Address	Start Date	Completion Date	Objective	Outcome	Specific Objectives	Accomplishment Type	Proposed Accomplishment	Outcome Indicators	Priority Need	City wide	NRSA	Slum Blight	City Districts
CDBG	PSHL	LMC	05S	Southwest Solutions (RR)	75,000.00	Quickly rehouse families and individuals that are literally homeless.	1600 Porter Street Detroit MI 48216	7/1/2019	6/30/2020	Decent Housing	Affordability	End Chronic Homelessness	People	120	Tenant-based rental assistance/Rapid rehousing	Rapid Re-housing	X			
CDBG	PSHL	LMC	05Q	United Community Housing coalition (HP)	369,589.06	Counseling and financial assistance for those at-risk of homeless.	2727 Second Ave., Suite 313 Detroit MI 48201	7/1/2019	6/30/2020	Decent Housing	Affordability	End Chronic Homelessness	People	395	Homelessness prevention	Prevention	X			
CDBG	PSHL	LMC	05S	Wayne Metro Community Action	110,000.00	Quickly rehouse families and individuals that are literally homeless.	7310 Woodward Ave Suite 800, Detroit MI 48202	7/1/2019	6/30/2020	Decent Housing	Affordability	End Chronic Homelessness	People	130	Tenant-based rental assistance/Rapid rehousing	Rapid Re-housing	X			
CDBG	PSHL	LMC	03T	YWCA Interim House (ES)	45,562.50	Provides domestic abuse shelter for women and their children.	Suppressed	7/1/2019	6/30/2020	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	35	Homeless person overnight shelter	Emergency shelter and transitional housing	X			
CDBG	PSHL	LMC	05U	Foreclosure Prevention	225,000.23	Reserved for future allocation for Emergency Foreclosure Prevention Services	2 Woodward CAYMC, Detroit, MI 48226	7/1/2019	6/30/2020	Decent Housing	Affordability	End Chronic Homelessness	People	150	Homelessness prevention	Foreclosure Prevention	X			
				PSHL Subtotal	2,475,417.00															
				Total PS & PSHL	7,899,066.00															
	REPAY	N/A	19F	Fort Shelby	1,864,538.00	Repayment of Section 108 Loan	2 Woodward CAYMC, Detroit, MI 48226	7/1/2019	6/30/2020	N/A	N/A	N/A	Other	N/A	N/A	Other	N/A	N/A	N/A	N/A
	REPAY	N/A	19F	Garfield II - Note 1 - Garfield Estates	729,189.00	Repayment of Section 108 Loan	2 Woodward CAYMC, Detroit, MI 48226	7/1/2019	6/30/2020	N/A	N/A	N/A	Other	N/A	N/A	Other	N/A	N/A	N/A	N/A
	REPAY	N/A	19F	Garfield II - Note 2 - Nhamdi Ctr	201,106.00	Repayment of Section 108 Loan	2 Woodward CAYMC, Detroit, MI 48226	7/1/2019	6/30/2020	N/A	N/A	N/A	Other	N/A	N/A	Other	N/A	N/A	N/A	N/A
	REPAY	N/A	19F	Garfield Geothermal	117,955.00	Repayment of Section 108 Loan	2 Woodward CAYMC, Detroit, MI 48226	7/1/2019	6/30/2020	N/A	N/A	N/A	Other	N/A	N/A	Other	N/A	N/A	N/A	N/A
	REPAY	N/A	19F	Garfield Sugar Hill	377,747.00	Repayment of Section 108 Loan	2 Woodward CAYMC, Detroit, MI 48226	7/1/2019	6/30/2020	N/A	N/A	N/A	Other	N/A	N/A	Other	N/A	N/A	N/A	N/A
	REPAY	N/A	19F	Mexicantown	350,024.00	Repayment of Section 108 Loan	2 Woodward CAYMC, Detroit, MI 48226	7/1/2019	6/30/2020	N/A	N/A	N/A	Other	N/A	N/A	Other	N/A	N/A	N/A	N/A

2019-2020 HUD Annual Action Plan Projects and Activities

Program Name	Activity	National Objective	Matrix Code	Sponsor Name (Activity Name)	Recommended Amount	Project Description	Site Address	Start Date	Completion Date	Objective	Outcome	Specific Objectives	Accomplishment Type	Proposed Accomplishment	Outcome Indicators	Priority Need	City wide	NRSA	Slum Blight	City Districts
	REPAY	N/A	19F	Vernor Lawndale	140,251.00	Repayment of Section 108 Loan	2 Woodward CAYMC, Detroit, MI 48226	7/1/2019	6/30/2020	N/A	N/A	N/A	Other	N/A	N/A	Other	N/A	N/A	N/A	N/A
	REPAY	N/A	19F	Woodward Garden I	2,100,049.00	Repayment of Section 108 Loan	2 Woodward CAYMC, Detroit, MI 48226	7/1/2019	6/30/2020	N/A	N/A	N/A	Other	N/A	N/A	Other	N/A	N/A	N/A	N/A
				Repayment of 108 Loan Subtotal	5,880,859.00															
				Grand Total CDBG	34,516,333.00															
ESG	ESG	N/A	20	Emergency Solutions Grant Projects	2,917,168.00	ESG Projects	2 Woodward CAYMC, Detroit, MI 48226	7/1/2019	6/30/2020	N/A	N/A	N/A	Other	N/A	N/A	Homeless/HIV/AIDS	X			
					2,917,168.00	ESG Total														
HOME	AD/PLN	N/A	21H	HOME Administration	673,757.00	Administration. Overall management of the HOME program.	2 Woodward CAYMC, Detroit, MI 48226	7/1/2019	6/30/2022	N/A	N/A	N/A	Other	N/A	N/A	Administration/Planning	N/A	N/A	N/A	N/A
HOME	HOME	N/A	N/A	HOME Home Projects	5,053,176.00	HOME funds reserved for various HOME programs, projects and operations.	2 Woodward CAYMC, Detroit, MI 48226	7/1/2019	6/30/2022	Decent Housing	Affordability	Housing Units	Housing Units	125	Increase the supply of affordable rental housing. Improve the quality of affordable rental housing	Rental/Owner Housing	X			
HOME	HOME	N/A	N/A	HOME CHDO Project	1,010,635.00	HOME funds reserved for projects carried out by community housing development organizations (CHDO)	2 Woodward CAYMC, Detroit, MI 48226	7/1/2019	6/30/2022	Decent Housing	Affordability	Housing Units	Housing Units	60	Increase the supply of affordable rental housing. Improve the quality of affordable rental housing	Rental/Owner Housing	X			
					6,737,568.00	HOME Total														
HOPWA	AD/PLN	N/A	21A	HOPWA Administration	84,776.00	Administration. HOPWA Grant administration.	2 Woodward CAYMC, Detroit, MI 48226	7/1/2019	6/30/2020	N/A	N/A	N/A	N/A	N/A	N/A	Administration/Planning	N/A	N/A	N/A	N/A



CITY OF DETROIT

Policies and Procedures Manual for Emergency Solutions Grants (ESG) Programs

City of Detroit
Office of Housing Revitalization
Coleman A. Young Municipal Center
2 Woodward Ave, Suite 908
Detroit, MI 48226

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Section 1: General Information and Background

Purpose of This Document

This document is intended to serve as a guide for subrecipients of the City of Detroit's Emergency Solutions Grants (ESG) Program. The document provides an overview of the ESG Program, outlines the requirements for effectively using grant funds, and describes the policies and procedures for conducting activities under the ESG Program. Please note programs receiving ANY City of Detroit funds through the ESG or CDBG match program (also known as Homeless Public Service) are bound by the information contained in this manual.

It is important to note that this document summarizes various grant requirements and is not intended to replace the regulations in [24 CFR Part 576](#) or any applicable federal, state, or local laws. In addition to this document, subrecipients should also reference the program regulations and the grant agreement to ensure compliance with the requirements of the ESG Program.

How to Use This Document

Subrecipients can use this document as an ongoing reference guide throughout the implementation of their ESG-funded program. The document is organized into sections that can be easily referenced using the table of contents.

The applicable rules for any specific project depend on both the source of funds (Detroit Continuum of Care funds or Emergency Solutions Grants funds through the City of Detroit Office of Housing and Revitalization) and the particular program component for which the funds are designated. As such, not every section of this manual is applicable to every program.

This manual has been organized into subsections that are most relevant to each program component type in order to provide easy access to applicable sections for any given provider. Readers who are unsure under which component their project is funded should refer to their grant agreement and the descriptions of ESG program components. If additional questions arise, please contact the [City of Detroit](#) for additional information about program requirements and effective implementation strategies of the ESG Program.

Guiding Principles

To ensure continuity and consistency within City of Detroit ESG-funded programs, subrecipients should follow the guiding principles outlined below when implementing their programs:

- Housing is a basic human need; providers must ensure that housing options offered to clients are accessible, safe, and affordable;

- Programs should first ensure that a client’s basic needs are met (food, housing, clothing, etc.) prior to focusing on other needs (recovery, employment, education, etc.) based on the client’s situation and their requests for specific types of assistance;
- Clients have the right to set their own goals and make their own decisions, even if their goals are different than those of the service provider. Service providers should work to reduce as many barriers to services as possible;
- Clients are the experts in what they need and how they can achieve their goals. A client’s strengths and assets should always be leveraged and considered in service delivery;
- Every person has inherent dignity and worth; service providers should treat all clients with respect, being mindful of individual differences and cultural and ethnic diversity;
- Clients have a right to privacy, confidentiality, and to be informed of their rights (especially related to their records, program termination, grievances, etc.);
- Services delivered to clients should promote client well-being and work to integrate the client with mainstream resources and the larger community as much as possible.

What is ESG?

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) revised the Emergency Shelter Grants Program and renamed it the Emergency Solutions Grants (ESG) Program. The [ESG Interim Rule](#) went into effect on January 4, 2012.

The ESG Program provides funding in order to: (1) engage homeless individuals and families living on the street; (2) improve the number and quality of emergency shelters for individuals and families experiencing homelessness; (3) help operate these shelters; (4) provide essential services to shelter residents; (5) rapidly rehouse homeless individuals and families; and (6) prevent families/individuals from becoming homeless. ESG funds can be used for five program components: street outreach, emergency shelter, homelessness prevention, Rapid Re-Housing assistance, and HMIS. Though not a program component, funds may also be used for necessary administrative activities.

For more information about the ESG Program, including program guides and tools, visit the [ESG Program page](#) on the HUD Exchange website.

City of Detroit Contact Information

Staff working at the City of Detroit’s Housing and Revitalization Department maintain traditional business hours and can be contacted at:

Phone: 313.224.6380

Website: <http://www.detroitmi.gov/HRD>

Frequently Used Terms and Definitions

Americans with Disabilities Act (ADA) Compliance

The City of Detroit requires all ESG-funded shelters to comply with the [ADA](#) regulations.

The ADA and Section 504 both stipulate that “no otherwise qualified person with disabilities shall, solely by reason of his or her disability, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance.” The Fair Housing Amendments Act regulations state “it shall be unlawful for any person to refuse to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford a person with a disability equal opportunity to use and enjoy a dwelling unit including public and private use areas.”

Continuum of Care

A Continuum of Care (CoC) is a regional or local planning body that coordinates housing and services funding for homeless families and individuals. The Detroit CoC oversees homeless services in Detroit, Highland Park, and Hamtramck.

Definitions of Homelessness

Category 1: Literally Homeless

An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

1. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings including a car, park, abandoned building, bus or train station, airport, or camping ground.
2. An individual or family living in a supervised publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, State, or local government programs for low-income individuals).
3. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Category 2: Imminent Risk of Homelessness

An individual or family who will imminently lose their primary nighttime residence, provided that:

1. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance.
2. No subsequent residence has been identified
3. The individual or family lacks the resources or support networks, e.g., family, friends, faith-based, or other social networks, needed to obtain other permanent housing.

Category 3: Homeless Under Other Federal Statutes (NOTE: CoC Program-funded projects are not authorized by HUD to serve this category)

Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

1. Are defined as homeless under section 387 of the Runaway and Homeless of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a)
2. Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance
3. Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance
4. Can be expected to continue in such status for an extended period of time because of chronic disabilities; chronic physical health or mental health conditions; substance addiction; histories of domestic violence or childhood abuse (including neglect); the presence of a child or youth with a disability; or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.

Category 4: Fleeing/Attempting to Flee Domestic Violence

Any individual or family who:

1. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
2. Has no other residence; and
3. Lacks the resources or support networks, e.g., family, friends, and faith-based or other social networks, to obtain other permanent housing. [24 CFR 578.3](#). Chronically Homeless McKinney-Vento Act.

Definition of Chronically Homeless

HEARTH/ McKinney Vento Act ([24 CFR 91.5](#) and [24 CFR 578.3](#)) defines Chronically Homeless as:

1. A homeless individual, who: Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least 12 months or on at least 4 separate occasions in the last 3 years where the combined occasions must total at least 12 months.

- a. "Occasions" must be separated by a break of at least seven nights.
 - b. Stays in institution of fewer than 90 days do not constitute a break in homelessness;
- AND**
- c. Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability; **OR**
 2. An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; **OR**
 3. A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraphs (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

Developmental Disability

Developmental disability is defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C.15002) as:

1. A severe, chronic disability of an individual that— (i) Is attributable to a mental or physical impairment or combination of mental and physical impairments; (ii) Is manifested before the individual attains age 22; (iii) Is likely to continue indefinitely; (iv) Results in substantial functional limitations in three or more of the following areas of major life activity: (A) Selfcare; (B) Receptive and expressive language; (C) Learning; (D) Mobility; (E) Self-direction; (F) Capacity for independent living; (G) Economic self-sufficiency; and (v) Reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.
2. An individual from birth to age 9, inclusive, who has a substantial developmental delay or specific congenital or acquired condition, may be considered to have a developmental disability without meeting three or more of the criteria described in paragraphs (1) (i) through (v) of the definition of "developmental disability" in this section if the individual, without services and supports, has a high probability of meeting those criteria later in life. [24 CFR 583.5](#)

Disabling Condition

1. A condition that: (i) Is expected to be long-continuing or of indefinite duration; (ii) Substantially impedes the individual's ability to live independently; (iii) Could be improved by the provision of more suitable housing conditions; and (iv) Is a physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury;

2. A developmental disability, as defined in this section; or
3. The disease of acquired immunodeficiency syndrome (AIDS) or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome, including infection with the human immunodeficiency virus (HIV). [24 CFR 583.5](#)

Emergency Shelter

Any facility where the primary purpose is to provide a temporary shelter for the homeless in general or for specific populations of the homeless. Emergency shelters do not require occupants to sign leases or occupancy agreements. Emergency shelters are expected to have low barriers to project entry and participation, and to have a primary focus on moving clients to permanent housing solutions as quickly as possible.

Equal Access

Federal regulations that require that all HUD-funded services and housing shall be made available without regard to actual or perceived sexual orientation, gender identity, or marital status. No recipient or subrecipient of HUD funds may inquire about the sexual orientation or gender identity of an applicant for, or occupant of, HUD-assisted housing for the purpose of determining eligibility for the housing or otherwise making such housing available. This prohibition on inquiries regarding sexual orientation or gender identity does not prohibit any individual from voluntarily self-identifying sexual orientation or gender identity. This prohibition on inquiries does not prohibit lawful inquiries of an applicant or occupant's sex where the housing provided or to be provided to the individual is a temporary emergency shelter that involves the sharing of sleeping areas or bathrooms, nor does it prohibit inquiries made for the purpose of determining the number of bedrooms to which a household may be entitled. For additional information, please visit the HUD Exchange page on [Equal Access](#).

Federal Fair Housing Act

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, as well as in other housing-related transactions based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and disability. For additional information, please see the HUD page on the [Fair Housing Act](#).

Fair Market Rent (FMR)

FMRs are gross rent estimates. The U.S. Department of Housing and Urban Development (HUD) annually estimates FMRs for 530 metropolitan areas and 2,045 nonmetropolitan county areas. HUD sets FMRs to assure that a sufficient supply of rental housing is available to program participants. By law, HUD is required to publish new FMRs at the start of each federal fiscal year on October 1.

Fair Market Rents are updated by HUD every year and can be found online at:

<http://www.huduser.org/portal/datasets/fmr.htm>

Family/Household

HUD definition of family includes, but is not limited to, the following, regardless of actual or perceived sexual orientation, gender identity, or marital status:

1. A single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person; or
2. A group of persons residing together, and such group includes, but is not limited to: (i) A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family). [24 CFR 5.403](#)
3. Section 576.102(b) of the ESG interim rule prohibits ESG-funded programs from denying a family admission to an ESG-funded program or ESG-funded services based on the age of a child under the age of 18 if the program provides services to families with children.

Clarity on the Definition of Family

According to HUD, a family is simply one or more individuals who live together. Members of the family do not need to be related by blood, marriage, or in any other legal capacity. Family members who are away from the household for a certain period of time may be considered part of the family. Live-in aides are also considered a family member. HUD's definition of family is broad to help make sure decent and affordable housing is available to every type of family.

Housing First

Housing First emerged as an alternative to the linear approach in which people experiencing homelessness were required to first participate in and graduate from short-term residential and treatment programs before obtaining permanent housing. In the linear approach, permanent housing was offered only after a person experiencing homelessness could demonstrate that they were "ready" for housing. By contrast, Housing First is premised on the following principles:

- Homelessness is first and foremost a housing crisis and can be addressed through the provision of safe and affordable housing.
- All people experiencing homelessness, regardless of their housing history and duration of homelessness, can achieve housing stability in permanent housing. Some may need very little support for a brief period of time while others may need more intensive and long-term supports.
- Everyone is "housing ready." Sobriety, compliance in treatment, or even criminal histories are not necessary to succeed in housing. Rather, homelessness programs and housing providers must be "consumer ready."
- Many people experience improvements in quality of life in the areas of health, mental health, substance use, and employment, as a result of achieving housing.
- People experiencing homelessness have the right to self-determination and should be treated with dignity and respect.
- The exact configuration of housing and services depends upon the needs and preferences of the population.

While the principles of Housing First can be applied to many interventions and as an overall community approach to addressing homelessness, this document focuses on Housing First in the context of permanent supportive housing models for people experiencing chronic homelessness.

Homeless Management Information System (HMIS)

HMIS is the information system designated by the Continuum of Care to comply with HUD's data collection, management, and reporting standards. It is used to collect client-level data and data on the provision of housing and services to homeless individuals and families as well as persons at-risk of homelessness.

Low-Barrier

Low-barrier services and housing place a minimum number of expectations on people requesting assistance. The aim is to have as few barriers as possible to allow more people access to services. This model often means that program participants are not expected to abstain from using alcohol or other drugs, or from carrying on with street activities while engaging in services or living on-site, so long as they do not engage in these activities in common areas and are respectful of other tenants and staff. Low-barrier facilities follow a harm reduction philosophy.

Permanent Housing (PH)

Permanent housing has no length of stay limitation. Residents of permanent housing maintain legal protections under local, state, and federal laws through a lease agreement for a term of at least one year. After one year, the lease is eligible for renewal or termination as per the terms of the lease. Permanent Housing is community-based housing and may include market-rate housing, subsidized housing, permanent supportive housing, and Rapid Re-Housing.

Permanent Supportive Housing (PSH)

Permanent Supportive Housing is long-term housing with no defined limitation of participation. Residents of Permanent Supportive Housing sign lease agreements with the property owner or management and maintain full tenancy rights under local, state, and federal laws. In addition to permanent housing, PSH offers supportive services on a voluntary basis to assist formerly homeless persons in living independently and successfully maintaining the terms of their lease.

Rapid Re-Housing (RRH)

Rapid Re-Housing is an intervention, informed by a Housing First approach that is a critical part of a community's effective homeless crisis response system. Rapid Re-Housing rapidly connects families and individuals experiencing homelessness to permanent housing through a tailored package of assistance that may include the use of time-limited financial assistance and targeted supportive services. Rapid Re-Housing programs help families and individuals living on the streets or in emergency shelters solve the practical and immediate challenges to obtaining permanent housing while reducing the amount of time they experience homelessness. Rapid Re-Housing also helps families and individuals avoid a near-term return

to homelessness and links them to community resources that enable them to achieve housing stability in the long-term. Rapid Re-Housing is an important component of a community's response to homelessness. A fundamental goal of Rapid Re-Housing is to reduce the amount of time a person is homeless.

Details on the provision of supportive services that can be provided are set forth in [24 CFR 578.53](#). Tenant-based rental assistance provided through RRH can be short-term (up to 3 months) and/or medium-term (for 3 to 24 months), as set forth in [24 CFR 578.51\(c\)](#). It is important to note that while HUD allows for up to 24 months of Rapid Re-Housing assistance, **the City of Detroit's ESG program has limited the length of Rapid Re-Housing financial assistance to a maximum of 18 months.**

Rent Reasonableness

The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units.

In many areas, the easiest way to determine rent reasonableness is to use a housing database search engine that will compare units and rents against one another. Other local resources (such as market surveys, classified ads, and information from real estate agents) may also be used to obtain information. When comparing rent reasonableness, the proposed unit must be compared to three other units.

For additional information on rent reasonableness under the Continuum of Care Program, please review this [HUD Exchange Resource](#).

Rent Reasonableness and Fair Market Rent (FMR)

Rental assistance may only be utilized on eligible housing units whose total rent does not exceed the fair market rent (FMR) established by HUD, as provided under [24 CFR § 982.503](#). The total rent for the eligible unit must also comply with HUD's standard of rent reasonableness, as established under [24 CFR § 982.507](#). These rent restrictions are intended to ensure that program participants can remain in their housing after their ESG assistance ends.

Rent reasonableness and FMR requirements are not applicable when an agency is only providing financial assistance or services under Housing Stabilization and Relocation Services. Such services include: rental application fees, security deposits, an initial payment of last month's rent, utility payments/deposits, moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, legal services, credit repair. Note that this guidance only applies to ESG homeless prevention and Rapid Rehousing. For guidance on CoC rules regarding FMR and rent reasonableness, please consult the following [HUD Exchange resource](#).

For more information about calculating rent reasonableness and FMR, please review this [HUD Exchange Resource](#).

Subrecipient

Subrecipient refers to a private nonprofit organization, or unit of local government that receives a contract for CoC or ESG funds from a recipient to carry out a project. The term subrecipient replaces the terms “project sponsor” and “subgrantee.” Although the term subrecipient is used throughout this manual, in other context, MSDHA may refer to ESG subrecipients as “grantees.”

Transitional Housing (TH)

Transitional housing is community and/or program sponsored housing with a defined limitation of participation of up to 24 months. Residents of transitional housing sign a lease or occupancy agreement for a term of at least one month and may be offered supportive services to locate and secure permanent housing and to support a household’s ability to successfully maintain the terms of a lease agreement. Transitional Housing is designed to facilitate the movement of homeless individuals and families into permanent housing within 24 months. The program participation cannot be extended past the 24-month expiration. [24 CFR§ 578.3](#)

Victim Service Providers

Victim service providers are private nonprofit organizations whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women’s shelters, domestic violence transitional housing programs, and other programs. Victim Service Providers play an integral part in protecting vulnerable persons. As a result, HUD has created additional and alternative policies to protect both the personal information and personal safety of clients served by these agencies. For additional information on protecting persons seeking safety or HUD’s policies for victim service providers please review this [HUD Exchange Resource](#).

Section 2: Funding Process and Requirements

Summary

The [Emergency Solutions Grants \(ESG\)](#) Program was established through the [Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009](#) (HEARTH Act). ESG regulations were established in an interim rule published in the Federal Register on December 5, 2011. The U.S. Department of Housing and Urban Development (HUD) administers the ESG Program and allocates funding to recipients each year. In Detroit, the City of Detroit's Office of [Housing and Revitalization](#) applies for and administers ESG funds.

Grant Awards and Spending Requirements

The City of Detroit receives an ESG allocation from HUD each year. As an ESG recipient, Detroit is required to consult with the local Continuum of Care to determine how to allocate ESG funds to subrecipients. The grant amount, except for administrative costs, must be obligated by the City of Detroit within 180 days after the date that HUD signs the grant agreement. Funds are considered obligated through either an agreement or award letter with a subrecipient that stipulates the required payment; a procurement contract; or a written designation of a department within the City of Detroit government to carry out an eligible activity.

In Detroit, organizations receive notification of their grant award through the receipt of an "award letter". The award letter will list a date by which organizations are expected to submit a scope and budget for the project. Please note that organizations are expected to respond to request for contract documentation by the date outlined on their award letter in order to expedite the contracting process.

Detroit must draw down and expend funds from the year's grant at least once per quarter of the program year. The full grant amount must be expended within 24 months after the date that HUD signs the grant agreement. The City of Detroit is required to pay subrecipients for eligible activities within 30 days after receiving a payment request.

Subrecipients are expected to spend the funds provided within the initial grant term. Requests for extension must occur 90 days prior to contract expiration in order to be considered. Repeated extension requests may result in a reduction in future grant awards. Organizations who are not on track to expend their awarded contract three months into the contract will be expected to submit a spend plan. If the organization is still not on track at six months, the City of Detroit reserves the right to reallocate the funds to a proven spender.

Additional information about obligation, expenditure, and payment requirements can be found in 24 CFR 576.203.

Subrecipients must request payment from the City of Detroit using the invoicing process outlined in this manual, once their ESG contract is in place. Subrecipients requesting reimbursement must adhere to the following:

- Submit program reimbursement requests and supporting documentation by the 15th of each month for the previous month.
- Provide the Exhibit E and Exhibit F reports from HMIS as part of the submission package.
- Submit one paper copy of the reimbursement packages to the [City of Detroit's Housing and Revitalization Offices](#).

Failure to submit timely requests for reimbursement can result in reallocations, reductions in awards, or loss of future program funding.

After review and submission of payment documentation, subrecipients will be notified of any deficiencies and/or disallowed costs. Following City of Detroit approval, requested invoices should be uploaded to the iSupplier portal for reimbursement. The City of Detroit is committed to timely reimbursement of subrecipients and has created internal timeliness expectations to meet this requirement, however, the 30-day payment clock begins when a **complete** reimbursement package is submitted by the subrecipient. Please refer to Appendix A for additional information.

Payments should be delivered to the following address:

City of Detroit
Housing and Revitalization Department
2 Woodward Avenue, Suite 908
Detroit, MI 48228

For questions related to the ESG payment process, please contact the City of Detroit at (313) 224-9974.

Eligible Subrecipients

Private, nonprofit, tax-exempt organizations that plan to provide street outreach, emergency shelter, Rapid Re-Housing, and homelessness prevention services are eligible to apply for ESG funds. Applicants must be able to demonstrate that they have participated in an HMIS system for at least one full year. For organizations serving victims of domestic violence, the City of Detroit may approve another comparable tracking client systems per HUD guidelines.

Subrecipient Requirements

All City of Detroit ESG subrecipients must:

- Record all client-related data and activity using the Continuum of Care (CoC) established HMIS.
- Participate in the Continuum of Care.
- Participate actively in the community-wide Coordinated Assessment Model (CAM).
- Provide services consistent with a Housing First approach. (See Frequently Used Terms: Housing First for more information.)
- Comply with all requirements in their subrecipient agreements, federal requirements outlined in the ESG Interim Rule, and locally established written program standards.

Leadership & Management

The City of Detroit funded subrecipients' Board of Directors shall consist of voluntary (unpaid) members, with the possible exception of the agency's CEO or Director. Subrecipients must include on the board of directors, or some other policy-making entity, one or more members who are either homeless or formerly homeless to ensure alignment of services with needs.

Subrecipients' Board of Directors shall meet at least quarterly and set overall policy for the agency. Minutes of the meetings shall be maintained for a period of no less than five years. Subrecipients must have a secure storage space for confidential documents relating to clients and personnel. Subrecipients shall have a policy manual which includes the project's purpose, population served, regulations, rules, and procedures.

HUD Requirements

All projects must comply with the Fair Housing Act (including Equal Access and Family Separation), the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity regulations, and the Americans with Disabilities Act regulations. Refer to the City of Detroit Homeless Programs Policy and Procedure Manual or the links provided in this document for more information. All providers should establish organizational policies to ensure that all federal laws are followed in the administration of ESG services.

Other HUD Requirements

All funded projects are expected to be familiar with and adhere to all HUD requirements including the CoC Program Interim Rule, applicable Notices, and CoC Program Notice of Funding Available (NOFA) (s) under which the project is funded. This includes, but is not limited to:

- Participant eligibility
- Prioritization
- Allowable activities and costs
- Site control

- Subsidy layering
- Environmental review
- Matching requirements
- Calculating occupancy charges and rent
- Limitations on transitional housing
- Term of commitment, repayment of grants, and prevention of undue benefits
- Displacement, relocation, and acquisition
- Timeliness standards
- Limitation on use of funds
- Limitation on use of grant funds to serve persons defined as homeless under other federal laws
- Termination of assistance to program participants
- Fair Housing and Equal Opportunity
- Conflicts of interest
- Program income
- Recordkeeping requirements
- Grant and project changes
- Other applicable federal requirements as outlined in the regulations

Match Requirements

Federal Requirements

As an ESG recipient, the City of Detroit is required to match its ESG fiscal year award amount with an equal amount of cash and/or in-kind contributions such as donated buildings, donated materials, or volunteer services. Sources of match funds include any federal source other than the ESG program as well as state, local, and private sources. If matching funds are from a federal source, Detroit must ensure the following:

- The laws governing the funds that will be used to match do not prohibit those funds from being used as ESG match funds.
- If ESG funds are used as a source of matching funds for another federal program, that federal program's funds cannot be used as a source of ESG match funds.

If funds (regardless of the source) were used to match a previous ESG grant, those funds cannot be used to meet the matching requirements of a subsequent ESG award.

Eligible types of matching funds are as follows:

- Cash contributions: Cash expended to pay for allowable costs incurred by the recipient or a subrecipient.
- Noncash contributions: The value of any real property, equipment, goods, or services contributed to the recipient's or subrecipient's ESG program, provided that if the recipient or subrecipient had to pay for them with grant funds, the costs would have

been allowable. Noncash contributions may also include the purchase value of any donated building.

- Program income: Costs that are paid by program income, provided that they are eligible ESG costs and supplement the recipient's ESG program, can be counted towards the matching requirement.

When calculating the amount of noncash contributions, the following must be taken into consideration:

- To determine the value of any donated material, building, or lease, the recipient must use a method reasonably calculated to establish the fair market value.
- Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the recipient's or subrecipient's organization. If the recipient or subrecipient does not have employees performing similar work, the rates must be consistent with those ordinarily paid by other employers for similar work in the same labor market.
- Some noncash contributions are real property, equipment, goods, or services that, if the recipient or subrecipient had to pay for them with grant funds, the payments would have been indirect costs. Matching credit for these contributions must be given only if the recipient or subrecipient has established, along with its regular indirect cost rate, a special rate for allocating to individual projects or programs the value of those contributions.

Subrecipient Requirements

The City of Detroit uses Community Development Block Grant (CDBG) funds to help subrecipients meet match requirements. CDBG awards in the corresponding program year can be used as match. Any ESG match requirement that exceeds the CDBG award must be supplied by the subrecipient. Subrecipients will be required to submit a Match Documentation Form (Appendix B) with their last ESG payment for the program year. This match must be expended on ESG-eligible activities. Matching sources may include cash contributions expended for allowable expenses and non-cash contributions including, but not limited to: the value of any real property, equipment, goods, or services committed to support ESG-eligible activities during the period of the ESG subrecipient agreement. (See the above Federal Requirements section for more information).

For more information about the matching requirement, see [24 CFR 576.201](#).

Documenting Match Requirements

The City of Detroit and all subrecipients must keep records of the source of funds used to satisfy the ESG matching requirement. The records must indicate the fiscal year grant for which the matching contribution is being used. The records must also show how the value of noncash contributions was calculated. Note that, to the extent possible, the calculation for

volunteer services must use the same methods that the organization uses to determine regular personnel costs.

For more information about recordkeeping requirements, see [24 CFR 576.500](#).

Section 3: Coordinated Entry Systems

Summary

Coordinated Entry is a centralized and streamlined system for accessing housing and support services to end homelessness in a community. Coordinated Entry is required by the U.S. Department of Housing and Urban Development (HUD) for all Continuums of Care (CoCs) as stated in [24 CFR 578.7 \(a\)\(8\)](#) of the CoC Program Interim Rule. Detroit's Coordinated Entry System, the Coordinated Assessment Model (CAM), aims to work with households to understand their strengths and needs, complete a common assessment, and connect households with housing and homeless assistance (based on information gathered and on availability). ESG-funded and Community Development Block Grant (CDBG) Homeless Public Service programs are required to use the CoC's coordinated entry system, ESG-funded programs must work with the CoC to ensure that the CoC's coordinated entry system procedures and prioritization policies are consistent with the programs' written standards for providing ESG assistance (see Written Standards Requirements section below).

The details of these expectations are outlined below:

CAM Liaisons

Responsible for serving as point person between their respective agency and the CAM; some agencies appoint multiple CAM Liaisons, one for each program "type" the agency operates. Duties include, but are not limited to:

- Actively participate in applicable CAM sub-committee/workgroup meetings.
- Serve as primary point of contact for CAM and relay information learned through sub-committee meetings and other CAM Liaison communications to other staff at their agency.
- Communicate CAM-related concerns, issues, recommendations, and/or feedback from their agency to the appropriate CAM sub-committee.
- If interested, nominate themselves or other CAM Liaisons to serve as the one individual appointed from each sub-committee to the CAM Governance Committee.

All recipients and subrecipients of the CoC Program and ESG Program-funded projects must comply with the nondiscrimination and equal opportunity provisions of Federal civil rights law, including the following federal regulations: [Fair Housing Act](#) (including [Equal Access and Family Separation](#)), the [Equal Access to Housing in HUD Programs Regardless of Sexual](#)

[Orientation or Gender Identity](#) regulations, and the [Americans with Disabilities Act](#) regulations.

Prevention Provider

Responsible for providing prevention services. Duties include but are not limited to:

- Closely coordinating with CAM on activities, as outlined in the CAM Partnership MOU and the CAM Operations Manual, such as:
 - Swiftly respond to consumers referred to their agency, completing applicable HMIS duties.

Street Outreach Provider

Reports to the City of Detroit. Responsible for providing street outreach services. Duties include but are not limited to:

- Closely coordinating with CAM on activities, as outlined in the CAM Partnership MOU and the CAM Operations Manual, such as:
 - Swiftly respond to consumers referred to their agency, complete applicable HMIS duties, facilitate access to RRH or PSH programs for consumers referred to these programs.

All individuals/households that are met by street outreach are offered the same standardized process as those who access the CAM through Access Points. If an individual/household is met by street outreach during Access Point operating hours, street outreach will accompany the individual/household to an Access Point to be assessed and referred to shelter, if shelter is available. If an individual/household is met by street outreach after Access Point operating hours and would like to enter shelter, then the street outreach staff member can transport the individual/household directly to a shelter for the night. The shelter will then ask the individual/household to go to the Access Point the following day to be assessed. Regardless of the time of day, if an unsheltered individual/household refuses to go to an Access Point and/or refuses shelter for any reason, street outreach should attempt to complete the standardized assessment tool with them. This will include reporting the individual(s) name, location, and assessment outcome to the CAM for ongoing consumer tracking.

Coordinated Assessment Model (CAM) Processes for Linkage to Shelter

The primary method for accessing Emergency Shelter in the City of Detroit is the Coordinated Assessment Model (CAM). The CAM operates Access Points throughout the city that serve as points of entry for clients into the Emergency Shelter network. Information regarding CAM hours and locations can be found on the CAM website: www.camdetroit.org. CAM sites, or Access Points, are located to provide efficient referral to shelters in all areas of the city. All clients who are referred to shelter will be provided with the “Shelter Residents Rights” handout (Appendix C) to ensure clients understand minimum shelter expectations and how to file a grievance if they believe they’ve been mistreated.

Making a CAM referral

100% of clients must be referred to CAM. It is the shelter's responsibility to connect the client to CAM within 48 hours if the CAM did not serve as the initial intake point. This is to ensure clients in shelter get access to housing services they may qualify for.

In the case of daily in/out shelters, clients are expected to have a current (completed by the CAM staff within the last six months) VI-SPDAT on file. CAM will request a list of current shelter residents quarterly to determine whether a SPDAT needs to be completed. For clients who do not have a current assessment, shelters are responsible for coordinating a connection to CAM to ensure a linkage to services.

Shelters must provide an accurate daily bed count to the CAM to enable efficient placement of clients presenting at the Access Points that cannot be diverted from the shelter system. Daily bed count data must be provided to the CAM via email or phone by 9 A.M. daily.

Shelter beds for which CAM has made a referral shall be held until 9pm. After 9pm, referrals are no longer honored and beds are distributed on a first-come, first-serve basis.

Clients who are temporarily or permanently banned from the facility must be entered into HMIS by the shelter within 24 hours of the ban being issued to the client. Failure to update client status including suspensions and bans may result in the CAM system referring "banned" individuals back to the agency that banned them.

Households seeking Emergency Shelter should be advised as follows in the chart below:

Detroit CAM Emergency Shelter Access Process			
	Hours of Operation		
	During CAM Operating Hours	After hours/ weekends/holidays	Street Outreach
Method of accessing Emergency Shelter	Household presents in person at a CAM Access Point. Access Points hours and locations can be found at: www.camdetroit.org	Household presents directly to Emergency Shelter. Emergency Shelter staff assists household with shelter placement. Client is referred to CAM Access Point for intake within 48 hours of shelter request.	Street Outreach team conducts CAM intake, documentation, and shelter/warming center referral. Street Outreach team assists with shelter placement and transportation.

CAM Coordination Expectations

Shelter providers and the Coordinated Assessment entity share the goal of linking families and individuals with housing as quickly and effectively as possible. Therefore, shelter case management staff should coordinate with the CAM navigators to connect persons experiencing a housing crisis with the resources and community services they need. This coordination will help the client to secure safe housing as quickly as possible and will increase the likelihood of successful housing retention. In cases where CAM staff are unable to work directly with persons experiencing a housing crisis, Detroit Emergency Shelter staff will provide the case management, support, and linkage to community resources to assist households.

CAM Coordination Related to Housing Choice Vouchers (HCV)

Current community policy states that all households scoring on the VI-SPDAT assessment for Rapid Re-Housing should complete a Housing Choice Voucher (HCV) application with a CAM staff after entering shelter. The CAM and shelter providers share responsibility for:

1. Recertifying clients' homelessness eligibility at 90-120 day intervals
2. Communicating to clients when they have been taken off the waitlist and can receive a voucher.

The specific expected process for communicating general HCV information and HCV waitlist status to clients' is as follows: are as follows:

1. Each shelter is required to designate an HCV point of contact and share this contact information with the CAM and other shelter providers.
2. The HCV point of contact is responsible for recertifying clients who remain in their shelter at each recertification interval.
3. Upon HCV pull, staff from the CAM lead agency will review names that are pulled. CAM staff will create a spreadsheet that includes client name and HMIS number as well as the shelter they are currently residing at (according to HMIS) IF that household has not yet transitioned to Rapid Re-Housing. This information will make it easier to review the list to determine the status of the households at each shelter at the time of referral.
4. Upon receipt of the list of tenants pulled off the HCV waitlist, if the household is currently in that organization's shelter, they should inform that client of the HCV pull and details of the briefing, required documents, etc.
5. If the household is currently in a different shelter, the HCV point of contact will notify the HCV point of contact at that other shelter that the household has been pulled off the HCV waitlist via email.
6. At minimum, shelters should be aware of the required documents and steps needed in the HCV application process so that they can support households as they seek to lease up.

Rapid Re-Housing (RRH) Providers

Report to HUD, CoC Lead Agency, and the City of Detroit, depending on funding. Responsible for providing Rapid Re-Housing activities. Duties include but are not limited to:

- Closely coordinating what with CAM on activities, as outlined in the CAM Partnership MOU and the CAM Operations Manual, such as:
 - Acquiring accurate program vacancies, streamlining eligibility/screening criteria, providing feedback on referrals that are rejected, completing applicable HMIS duties.
 - Swiftly respond to consumers referred to their agencies for RRH.

Written Standards Requirements

The City of Detroit has drafted and implemented street outreach, emergency shelter, and homeless prevention written standards. This ESG Policies and Procedures Manual encompasses and expands upon the spirit of the [Detroit CoC Homeless System written standards](#) posted on the Homeless Action Network of Detroit (HAND) website.

Section 4: Principles of Best Practice

Summary

Best Practices are methods, techniques, and regulations proven to provide fair and equal service practices. The City of Detroit is committed to utilizing the following best practices which include HUD regulations and service practice method that support in the development and management of ESG-funded programs designed to reach historically vulnerable and underserved persons. City of Detroit ESG- funded programs are required to implement and will be monitored for compliance on the following best practices.

Equal Access to Housing Regardless of Sexual Orientation or Gender Identity

ESG recipients and subrecipients are required to follow the regulations in the Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs final rule, published in the Federal Register on September 21, 2016. This rule ensures equal access to programs and shelters funded by HUD's Office of Community Planning and Development (CPD). Additionally, this rule builds on the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity final rule, published in the Federal Register on February 3, 2012. This rule requires recipients and subrecipients of CPD funding to grant equal access to their program facilities, accommodations, and services in accordance with the individual's gender identity and in a way that creates equal access to the individual's family.

ESG-funded programs must establish policies and procedures for program admissions, occupancy, and participant privacy and security that align with the requirements established in the Equal Access rules, including the following:

- Make housing available without regard to actual or perceived sexual orientation, gender identity, or marital status.
- Grant equal access to facilities, buildings, benefits, accommodations, and services to individuals in accordance with the individual's gender identity, and in a manner that affords equal access to the individual's family.
- Prohibit any requirements for individuals to prove gender identity (including documentation, ID, etc.). This prohibition also applies to intrusive questioning, including questions about a person's anatomy or medical history.
- Prohibit consideration of a client or potential client's entry into a program because their appearance or behavior does not conform to gender stereotypes.
- Prohibit any segregation of transgender clients (e.g., transgender-only shelter or space). However, if a transgender client requests an accommodation (like a more private space) and the facility can accommodate the request, this is acceptable;

- Base discharges, service restrictions, and warnings following any incidents involving transgender clients only on the individual’s behavior, not gender identity.
- Have a zero tolerance for harassment of transgender residents. Staff shall recognize that harassment based on gender identity is discriminatory behavior and will be treated as such. All unacceptable behavior against transgender residents will be dealt with based on the program’s behavior policies. Due to the high incidence of harassment of transgender people, concerns about the safety of a transgender resident will be taken with utmost seriousness. Unacceptable behavior can include harassment, abuse, assault, discrimination, intimidation, threats, violence, and many other forms.
- Permit any clients expressing concern to use bathrooms and dressing areas at a separate time from others in the facility.
- Work (to the extent feasible) with the layout of any shelter facilities to provide for privacy in bathrooms and dressing areas (ESG funds may be used to renovate an emergency shelter to maximize privacy and safety).
- Ensure that policies do not isolate or segregate clients based upon gender identity;
- Take reasonable steps to address any safety or privacy concerns expressed by clients. This may include:
 - Responding to the requests of the client expressing concern through the addition of a privacy partition or curtain.
 - Providing clients the use of a nearby private restroom or office.
 - Providing clients a separate changing schedule.
- Provide all staff (full-time, part-time, and volunteer) and contractors with ongoing training about the program’s policies and the needs, concerns, and realities of transgender people seeking services.

Best practices suggest that where the provider is uncertain of the client’s sex or gender identity, the provider simply informs the client or potential client that the agency provides shelter based on the gender with which the individual identifies.

The following resources provides more information about implementing the Equal Access Rule:

[HUD Exchange LGBT Homelessness Page](#)

[Equal Access for Transgender People: Supporting Inclusive Housing and Shelters](#)

All emergency shelters receiving HUD funding are required by federal law to adhere to HUD’s [Equal Access Rule](#). The Equal Access Rule provides protection for any person or family seeking emergency shelter and removed barriers to access based on gender identity and family composition. No exceptions will be made to the requirements under the law. The City of Detroit stands firmly that all persons requesting shelter and utilizing shelter services are treated with the utmost respect and dignity. Discrimination of any kind will not be tolerated within the Detroit Homeless Service System.

Reasonable Accommodations/Modifications

A reasonable accommodation is a change in rules, policies, or procedures to help people with disabilities access housing or housing-related services.

- For example, a rental office that generally provides standard, printed rental applications could, as a reasonable accommodation to a person with a visual disability, provide a Braille version of the application or provide assistance in filling it out.
- Fair housing laws require housing and shelter providers to consider requests for accommodations by applicants, residents, and, in some limited instances, former residents.
- Housing providers cannot charge money for providing a reasonable accommodation.
- There is no limit to the number of reasonable accommodation requests a person with a disability may make.
- However, if providing the requested accommodation would pose an undue financial or administrative burden on the shelter or housing provider, or if it would fundamentally alter the nature of the program, the request is not “reasonable” and does not need to be granted.

If a prospective client household has requested a reasonable accommodation or modification, an Emergency Shelter provider may ask for verification of the disability and may also request assurances from the person’s healthcare worker or case manager.

A request for a reasonable accommodation should be granted if the following conditions are met:

- The person requesting the accommodation has a disability as defined by fair housing laws.
- The requested accommodation is necessary to afford the person an equal opportunity to use and enjoy the dwelling and related services.
- Complying with the request poses neither an undue administrative nor financial burden on the housing provider or program.
- Complying with the request will not fundamentally alter the nature of the program.

Americans with Disabilities Act (ADA) Compliance

The City of Detroit requires all ESG-funded shelters to comply with the following ADA regulations.

- The ADA and Section 504 both stipulate that “no otherwise qualified person with disabilities shall, solely by reason of his or her disability, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance. The Fair Housing Amendments Act regulations state “it shall be unlawful for any person to refuse to make reasonable accommodations in rules, policies, practices, or services, when such

accommodations may be necessary to afford a person with a disability equal opportunity to use and enjoy a dwelling unit including public and private use areas.”

- In cases where an emergency shelter location rotates based on availability of space and the new shelter location cannot accommodate a person’s disability, the emergency shelter is responsible for locating and assisting in the transfer of the person in housing crisis to a new and accessible emergency shelter facility. Under no circumstance will any person be denied emergency shelter based on a building’s inability to comply with ADA standards or its inability to provide physical accommodations. Emergency shelters who operate with City of Detroit funding and who rotate facilities based on availability or schedules must include written policies and procedures on relocating and securing shelter options when a new site cannot accommodate a person with a disability.

Low-Barrier

Low-barrier is a term used to describe a service or provider that makes help as easily accessible and user friendly as possible. A low-barrier approach is one that tries to minimize barriers such as paperwork, waiting lists, eligibility requirements, as well as physical and staff related characteristics that can stand in the way of people getting their needs met. It is an entry point for a variety of services and approaches.

What does it look like in action?

- Place: The doors and space are open and accessible.
- Presentation: The people are open, friendly, engaging, making everyone feel welcome and tuning in to different people’s needs and styles.
- Practice: Start where consumers present; accept challenging behavior; use assessment skills to build on strengths and develop plans. Maintain an inclusive approach to the work.

What it is not:

- A service model in and of itself
- A specific social work approach
- An outcome or a program goal
- A simple way of measuring a program’s success
- A “no barrier” or “no rules” or “no expectations” approach to social work

Federal Fair Housing Act

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and disability. For additional information, please see the HUD page on the [Fair Housing Act](#).

Termination of Assistance

It is important that providers effectively communicate termination and grievance procedures to participants and ensure that the procedures are fully understood. Posting the policy on a bulletin board in a common area within the facility is an effective way to ensure that the termination and grievance procedures are available for participants to access at any time. Additionally, all City of Detroit/CoC-funded agencies must include termination policies and procedures in their agency regulations and manuals that meet the guidelines outlined in this section. If a participant violates ESG program requirements, the subrecipient may terminate assistance in accordance with a formal process established by the subrecipient that recognizes the rights of individuals affected. The subrecipient 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 process must recognize the rights of the individuals affected and subrecipients must exercise judgment and examine all extenuating circumstances when determining which violations warrant termination. Assistance should only be terminated in the most severe cases.

For information detailing client termination from a specific program component (e.g., Emergency Shelter, RRH, etc.) please refer to that program component section.

Client Confidentiality and Privacy Policies

Subrecipients must have policies and procedures established in writing to ensure that the privacy and confidentiality of all ESG-funded program participants is protected. The ESG interim rule specifically requires that the written procedures ensure the following:

- All records containing personally identifying information (as defined in HUD's standards for participation, data collection, and reporting in a local HMIS) of any individual or family who applies for and/or receives ESG assistance will be kept secure and confidential.
- The address or general location of a domestic violence, dating violence, sexual assault, or stalking shelter funded through ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter.
- The address and location of any housing of a program participant will not be made public, except as provided under a pre-existing privacy policy of the recipient or subrecipient and consistent with state and local laws regarding privacy and obligations of confidentiality.

Subrecipients must also ensure that confidentiality and privacy policies meet the specific confidentiality and security requirements for HMIS data which are described in the [HMIS Data and Technical Standards](#).

It is recommended that policies and procedures include the following, at a minimum:

- Description of how participant files are to be stored and kept secure (e.g., locked files) and who has access to them.
- Assurance that participant files will not be removed from the program premises (or conditions in which this would be permitted).
- Process for obtaining written, informed consent to release participant information to an outside person/agency.
- Description of participant rights to: access their records; request updates to their records; request changes to information in their records with which they do not agree; and file a complaint if they feel their confidentiality has been breached.
- Provisions for training staff on privacy and confidentiality procedures. Training should include the following points:
 - Sharing participant information with other program staff should be limited only to staff directly involved with delivering services to the participant, should only include the information necessary for service delivery, and should occur only using secure methods or in private spaces.
 - Prohibition against sharing any private account information (e.g., usernames, passwords, etc.).
 - Disciplinary action that will result from failing to follow the established privacy and confidentiality policies.

Please note that client confidentiality also applies to City of Detroit and HUD on behalf of the funded program. Any information obtained by City of Detroit and/or HUD staff, as part of a performance review, will be held in the strictest confidence. City of Detroit and/or HUD staff will not include client Personally Identifiable Information (PII) in review working papers or in performance review reports. Additionally, if the City of Detroit or HUD staff asks for client files related to a performance/ monitoring review, then the agency must redact all Personal Identifiable Information (PPI) from any files that are being sent by mail or electronically, unless a secure, encrypted method can be used for electronic transmission.

Homeless Management Information Systems (HMIS) Requirements

All subrecipients are required to use the City of Detroit Homeless Management Information System (HMIS). If a subrecipient is a victim services provider or legal services provider, it may use a comparable database that collects client-level data over time and generates unduplicated aggregate reports based on the data. Information that is entered into a comparable database must not be entered directly into or provided to an HMIS.

As a best practice, all participant data should be entered as close to real-time as possible to ensure accuracy of reported data. The City of Detroit data standards require all data to be entered within 48 hours of entry or exit. The only exception to the 48-hour rule is that shelter providers who have frequent entries and exits (nightly in/out shelters) should not enter and exit clients daily. Instead, those facilities should track clients' attendance over the course of a month (i.e., enter nights the client stayed in shelter on a monthly basis).

All subrecipients are required to report HMIS Universal data elements as well as certain HMIS program-specific data elements for each program participant (including all participants within a family/household). HMIS users should search for participants in HMIS first prior to creating a new client record. Please reference the [Detroit CoC HMIS Data Standards](#), the [HMIS Data Standards Manual](#), and the [ESG HMIS Program Manual](#) for additional information about HMIS data collection requirements.

Section 5: Overview of ESG Program Components

Summary

ESG funds may be used for five program components: Street Outreach, Emergency Shelter, Homelessness Prevention, Rapid Re-Housing assistance, and HMIS; as well as administrative activities. The following summary presents the essential aspects of each component.

Program Components

Street Outreach refers to the activity of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. The term “unsheltered homeless people” is defined as:

1. An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings including a car, park, abandoned building, bus or train station, airport, or camping ground.

Emergency Shelter means any facility for which the primary purpose is to provide a temporary shelter for homeless people in general or for specific populations of homeless people and which does not require occupants to sign leases or occupancy agreements.

There are three primary components that ESG funds can be used on for emergency shelters:

- Renovation/Rehabilitation of buildings to be used as an emergency shelter for individuals and families experiencing homelessness
- Shelter operations
- Providing a range of essential services to shelter residents

Homelessness Prevention refers to activities designed to keep households that are at-risk of losing their housing from becoming homeless. Homelessness prevention services include housing relocation and stabilization services and/or short- and/or medium-term rental assistance as necessary to prevent the individual or family from moving to an emergency shelter, a place not meant for human habitation, or another place described in “category one” (literally homeless) of the homeless definition. It is most efficiently implemented when targeted to those at greatest risk of losing housing.

Rapid Re-Housing refers to activities designed to assist households that are literally homeless to move to permanent housing in the community as quickly as possible and achieve stability in that housing.

Rapid Re-Housing programs are designed to help those who are homeless transition into permanent housing. The primary goal is to stabilize a program participant in permanent housing as quickly as possible and to provide wrap-around services after the family or individual obtains housing. The program is designed for those who meet the criteria under category 1 and 4 of the homeless definition.

Rapid Re-Housing services include housing relocation and stabilization services and/or short- and/or medium-term rental assistance as necessary to help individuals or families living in shelters or in places not meant for human habitation.

A **Homeless Management Information System (HMIS)** is the information system designated by the Continuum of Care to comply with the HUD's data collection, management, and reporting standards. HMIS is used to collect client level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness. The recipient or subrecipient may use ESG funds (up to 2% of the grant award) to pay the costs of contributing data to the HMIS designated by the Continuum of Care for the area. The City of Detroit allows subrecipients to ask for up to 2% of their total grant award for HMIS related expenses.

If a subrecipient is a victim services provider or a legal services provider, then it may use ESG funds to establish and operate a comparable database that collects client-level data over time (i.e., longitudinal data) 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.

Section 6: Outreach and Housing Navigation

Summary

Outreach and Housing Navigation provides a vital link for persons living on the streets to services designed to assist in ending episodes of homelessness. Outreach and Housing Navigation are an essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. [24 CFR 576.101](#)

Guidelines for Outreach and Housing Navigation Best Practice

Outreach should be utilized as a powerful tool as part of a full continuum of services towards moving individuals and families who are literally homeless from the streets and into stable, permanent housing. It should not be used as a program that seeks to alleviate the burden of living on the streets or provide support to people as a replacement to providing them with independent, stable housing.

The City of Detroit recognizes that Outreach and Housing Navigation teams may use incentives to encourage trust and build relationships or to ensure that homeless households' emergency needs are met. However, this is not an eligible activity for reimbursement, and should never be the principal activity (e.g., a feeding program that provides sandwiches as its main goal).

NEW

Where one or more outreach and/or navigation teams work in the same area, the City of Detroit expects that agencies collaborate to provide complimentary services by ensuring the following:

1. A lead case manager/navigator is established through the By-Name List process.
2. The agency will lead the case management of the homeless individual until either the individual has been housed, or a more appropriate case manager is ready to take over.
3. Other agencies will reinforce this intervention so that agencies are not working against one another.

Code Blue Situations

“Code Blue” are emergency situations in which the City of Detroit may ask outreach providers to extend hours. Code Blue situations are defined as follows:

1. The temperature drops below 20 degrees Fahrenheit or the wind chill below 0 degrees
OR
2. Ice storms or freezing rain
OR
3. Snowstorm greater than 6 inches

NEW

Outreach and Housing Navigation Components

The City will fund two different service components under Outreach and Housing Navigation, Street Outreach and Navigation, which are expected to be compliant with the eligible activities listed below. Each service has its own specific components and performance goals.

Street Outreach Component

Services are provided in the streets with a majority of the services provided outside of normal business hours. The goal of Street Outreach is primarily engagement in order to develop relationships with unsheltered individuals and connect them with resources including shelter or shelter access points, substance abuse or mental health treatment, and/or mainstream benefits. Outreach teams must demonstrate active participation in the [chronic by-name-list process](#) and be proactive in coordinating with the Neighborhood Police Officers in the areas of service. Outreach teams must coordinate with agencies funded under the Navigation service component as well as CAM. To meet the need, the City will negotiate hours of operation for the programs, but applicants should plan that at least 50% of the team's regular operations

must be outside of normal business hours (between 5pm and 8am). Applicants are expected to mobilize a code blue response during extreme cold conditions defined above.

Navigation Component:

Services are provided to individuals and families identified through the chronic By Name List (BNL) process. Navigation teams provide case management services to work with unsheltered households to get them “document ready” and move them into permanent housing. *Document ready* is defined as assisting clients with obtaining all documentation needed for permanent housing. Refer to Appendix B for further information. This may require working with households on the streets or in drop in centers. Agencies funded under Navigation must coordinate with teams funded under the Outreach Service component as well as CAM.

NEW

Performance Benchmarks

These benchmarks are expectations of Outreach and Housing Navigation providers and will be integrated into ongoing programmatic monitoring:

Street Outreach:

- 100% of clients will meet the definition of unsheltered;
- Percentage of clients who complete all CAM required assessments; and
- Percentage of clients who exit to any sheltered destination (excluding jail/prison, hospitals, or residential project/halfway house)

Navigation:

- 100% of clients will meet the definition of unsheltered;
- Percentage of client who become “document ready”; and
- Percentage of clients exit to a permanent housing destination.

Outreach and Housing Navigation Eligible Activities

HUD’s ESG Program allows for 6 eligible activities under [Street Outreach](#): Engagement, Case Management, Emergency Health Services, Emergency Mental Health Services, Transportation and Services for Special Populations. However, the City of Detroit anticipates focusing the bulk of every street outreach award on engagement, case management, and transportation.

Subrecipients anticipating using funds on the other eligible activities must forward a model of practice to [the City of Detroit](#) for review, discussion, and approval before beginning work.

Per the ESG Interim Rule the six eligible activities are:

Engagement

The costs of activities to locate, identify, and build relationships with unsheltered homeless people and engage them for the purpose of providing immediate support, intervention, and

connections with homeless assistance programs and/or mainstream social services and housing programs. These activities consist of making an initial assessment of needs and eligibility; providing crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; and actively connecting and providing information and referrals to programs targeted to homeless people and mainstream social services and housing programs, including emergency shelter, transitional housing, community-based services, permanent supportive housing, and Rapid Re-Housing programs. Eligible costs include the cell phone costs of outreach workers during the performance of these activities.

Case Management

The cost of assessing housing and service needs, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant. Eligible services and activities include: using the centralized or coordinated assessment system as required under [24 CFR 576.400\(d\)](#); conducting the initial evaluation required under [24 CFR 576.401\(a\)](#), including verifying and documenting eligibility; counseling; developing, securing and coordinating services; obtaining Federal, State, and local benefits; monitoring and evaluating program participant progress; providing information and referrals to other providers; and developing an individualized housing and service plan, including planning a path to permanent housing stability.

Emergency Health Services

Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals operating in community-based settings, including streets, parks, and other places where unsheltered homeless people are living. ESG funds may be used only for these services to the extent that other appropriate health services are inaccessible or unavailable within the area.

Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate emergency medical treatment; and providing medication and follow-up services.

Emergency Mental Health Services

Eligible costs are for the direct outpatient treatment by licensed professionals of mental health conditions operating in community-based settings, including streets, parks, and other places where unsheltered people are living. ESG funds may be used only for these services to the extent that other appropriate mental health services are inaccessible or unavailable within the community.

Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual / family functioning or circumstances.

Eligible treatment consists of crisis interventions, the prescription of psychotropic medications, explanation about the use and management of medications, and combinations of therapeutic approaches to address multiple problems.

Transportation

The transportation costs of travel by outreach workers, social workers, medical professionals, or other service providers are eligible, provided that this travel takes place during the provision of services eligible under this section. The costs of transporting unsheltered people to emergency shelters or other service facilities are also eligible. These costs include the following:

1. The cost of a program participant's travel on public transportation.
2. Mileage allowance for service workers to visit program participants, if service workers use their own vehicles.
3. The cost of purchasing or leasing a vehicle for the recipient or subrecipient in which staff transports program participants and/or staff serving program participants. The cost of gas, insurance, taxes, and maintenance for the vehicle.
4. The cost of subrecipient staff time to accompany or assist program participants to use public transportation.

Services for Special Populations

ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under paragraphs (a)(1) through (a)(5) of this section. The term *victim services* means services that assist program participants who are victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.

While all the activities listed above are allowable under HUD regulations, the City of Detroit's primary focus is engagement and case management to link unsheltered households with shelter, permanent housing, and other services.

Outreach and Housing Navigation Client Files

General Program Documentation

Every client who has received a direct service from an ESG subrecipient must have a client file that documents the reason(s) for the assistance. Each file must include the following documentation:

- An assessment by either project staff or Coordinated Assessment Model (CAM) staff
- Signed HMIS Release(s) (for all adult members of the household)
- Verifications of Homelessness or At Risk of Homelessness that align to the project with which they are involved (e.g., third-party certification or self-declaration, plus backup documentation)

- Initial Consultation Form
- Case Notes (minimum of monthly case notes for clients receiving case management services)
- Individualized Housing and Service Plan
- Income Verification, including backup documentation (paystubs, third party verifications, etc.)
- As applicable, determinations of ineligibility (e.g., if a client requests ESG services and is deemed ineligible or declines services, a written explanation of why the client was ineligible or declined services, along with any rights of appeal the client may have).

Other Documentation

Documentation of compliance with the applicable requirements for providing service and assistance ([24 CFR 576.101](#)) includes:

- Engagement Documentation: Initial assessment of needs and eligibility; providing crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; and actively connecting and providing information and referrals to programs targeted to homeless people and mainstream social services and housing programs, including emergency shelter, transitional housing, community-based services, permanent supportive housing, and rapid-re housing programs.
- Case Management Documentation: Document eligibility; counseling; developing, securing and coordinating services; obtaining federal, state, and local benefits; monitoring and evaluating program participant progress; providing information and referrals to other providers; and developing an individualized housing and service plan, including planning a path to permanent housing stability.
- Emergency Health Services: Documentation of direct outpatient services provided.
- Emergency Mental Health Services: Documentation of direct outpatient services provided.
- Transportation documentation:
 - Cost of transporting unsheltered people to emergency shelters or other service facilities.
 - Cost of program participant's travel on public transportation.

Section 7: Emergency Shelter

Summary

Emergency shelter means any facility, the primary purpose of which is to provide a temporary shelter for homeless people in general or for specific populations of homeless people and which does not require occupants to sign leases or occupancy agreements. ESG may be used to operate the shelter or to provide a range of essential services to the residents. Temporary hotel and motel stays are also permitted under this component if no appropriate emergency shelter is available for a homeless individual or family. [24 CFR 576.102](#)

Goals of Emergency Shelter

- *Provide safety and shelter to households with no other place to go.*
- *Limit shelter stays to the shortest time necessary to help participants regain permanent housing.*
- *Maintain low-barrier admission criteria and high thresholds for expulsion.*
- *Ensure the coordination and/or provision of services to all persons seeking or utilizing shelter to ensure their housing crises are both rare and brief.*
- *Remain closely linked to an array of programs in order to accomplish this goal of stable permanent housing including, but not limited to: HCV Rapid Re-Housing, transitional housing, affordable housing placement, and employment.*
- *Link persons in housing crisis to applicable resources such as VA, SOAR, food stamps, TANF, housing, medical, mental health, employment, education, and financial assistance as appropriate.*

Eligible Emergency Shelter Activities

- Providing **essential services** to homeless families and individuals in emergency shelters.
- **Renovating** buildings to be used as emergency shelter for homeless families and individuals.
- **Operating** emergency shelters.
- Implementing assistance under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA).

Shelter Provider Expectations

The City of Detroit expects that all emergency shelter providers adhere to a standard of ethics and practices that ensure all persons in housing crisis are treated with dignity and respect. All City of Detroit funded emergency shelter programs will be required to incorporate the following practices into their policies and procedures:

- All persons in housing crisis should be treated with dignity and respect.

- All households will be treated fairly and will have all rules implemented consistently.
- No persons seeking shelter should face discrimination based on race, religion, ethnicity, national origin, sexual orientation, gender identity, age, political beliefs, disability, or family composition.
- All persons in housing crisis have the right to safe shelter, adequate food, and sanitary conditions.
- All households utilizing the emergency shelter system have the right to privacy and confidentiality.
- All households utilizing the emergency shelter system have the right to make their own choices, and those choices should be respected. It is the role of emergency shelter staff to assist households to identify possible consequences of those choices.
- All households utilizing the emergency shelter system are to be treated with warmth and friendliness to decrease alienation and despair, and to increase their chances of obtaining the services they need.
- All households in housing crisis have access and assistance in obtaining community supports to end their housing crisis, including: case management, medical and mental health, financial, legal, education, and employment services.

Performance Benchmarks

These benchmarks are expectations of shelter providers and will be integrated into ongoing programmatic monitoring:

- 100% of clients must be screened by CAM. It is the shelter's responsibility to connect the client to CAM within 48 hours if the shelter served as the initial point of entry.
- Shelter utilization must be at 90% according to the CoC APR.
- Percentage of exits to a permanent housing destination (shelters will be expected to demonstrate a 15% increase from organizational baseline or meet the system performance benchmark on exits to permanent housing)
- 85% of client charts will demonstrate a housing plan within 14 days of entry
- 100% of clients referred from the CAM will have a referral outcome in HMIS.

NEW

Benchmarks the Continuum of Care will be measuring to create future performance expectations:

- Percentage of clients exit to permanent housing destinations in 30, 90, 180 days
- Average length of stay in shelter

Expectations for Shelter Staff Training

In order to ensure high quality services for those in Emergency Shelter, agencies administering shelter programs within the City of Detroit will create a process to train new staff and review with current staff compliance on the following topics:

- HUD Regulatory Requirements
- ESG Regulatory Requirements
- Housing First

- Fair Housing/Equal Access/Housing Law
- Safety Protocol
- CPR/First Aid
- Shelter Residents Rights (Appendix C)

During the monitoring process, organizations will be asked to provide the details of their annual staff training policy and protocol as well as information on the on-boarding process for new employees.

We strongly encourage organizations to utilize all available training provided including training through the Detroit Continuum of Care, the State of Michigan, and other training initiatives.

Involuntary Family Separation

HUD issued regulations that prohibit all shelters from denying access to families based on the age of a child. This requirement has been issued through the HEARTH Act and through the ESG Interim Rule. All City of Detroit and CoC-funded emergency shelters and transitional housing facilities will comply with this requirement. Non-compliance may result in removal of ESG/CoC funds. Please see the following HEARTH Act language on family separation:

- **SEC. 404. PREVENTING INVOLUNTARY FAMILY SEPARATION.** ‘(a) IN GENERAL.—... any project sponsor receiving funds under this title to provide emergency shelter, transitional housing, or permanent housing to families with children under age 18 shall not deny admission to any family based on the age of any child under age 18.)
- **EXCEPTION:** Notwithstanding the requirement under subsection (a), project sponsors of transitional housing receiving funds under this title may target transitional housing resources to families with children of a specific age only if the project sponsor:
 - Operates a transitional housing program that has a primary purpose of implementing an evidence-based practice that requires that housing units be targeted to families with children in a specific age group.
 - Provides such assurances, as the Secretary shall require, that an equivalent appropriate alternative living arrangement for the whole family or household unit has been secured.

ESG Interim Rule language on family separation:

- **(b) Prohibition against involuntary family separation.** The age, of a child under age 18 must not be used as a basis for denying any family’s admission to an emergency shelter that uses Emergency Solutions Grant (ESG) funding or services and provides shelter to families with children under age 18.

Types of Emergency Shelters

Single-Sex Shelters

Single-sex shelters can only be operated using HUD funds under the following limited conditions:

- The shelter must serve individuals only. A shelter that accepts families with children cannot be a single-sex facility; and
- The shelter must be considered a “dwelling unit” and must be a single shelter that includes shared bedrooms or bathing facilities. See the CoC interim rule (which applies to ESG programs), section 578.93, for more information about this policy.

If an ESG-funded facility does not meet the conditions outlined above, then it cannot operate as a single-sex shelter and must serve eligible people of any gender.

Warming Centers

In Detroit, Warming Centers operate between November and March as a way to expand shelter capacity at times where those experiencing homelessness are at greater risk in unsheltered situations. Shelter policies and procedures that differ for Warming Centers will be clearly defined in this manual. If they are not, the same expectations exist for both types of facility.

Family Shelter

Any shelter that accepts families with children or couples presenting as family. Families and couples do NOT have to provide proof of marriage as a condition of shelter eligibility as outlined under [HUD’s Equal Access Rule](#). See *the Definition of Family* above in this Manual for a detailed explanation of family composition.

As there is significant variation between shelter models funded by the City of Detroit, as of the date of this publication, shelters must identify as one of the following:

1. **Emergency shelter** - Low-demand shelter designed to provide refuge from the street, typically overnight. Includes two CoC program models: emergency shelter (for adults) and youth low-threshold overnight shelter (for ages 18-24).
2. **Interim shelter** - Short-term program focused on re-housing with 24/7 access. Includes two CoC program models: interim housing (for adults/families) and youth interim housing (for ages 14-24).

Essential Services

The following eligible activities are permitted as part of essential services for individuals and families experiencing homelessness and residing in emergency shelters. The City of Detroit prioritizes case management that helps households to obtain permanent housing over other services listed below.

Case Management

The goal of emergency shelter is to provide a safe environment for person in housing crisis AND to ensure that services and support are provided that ensure a person's time in housing crisis is both rare and brief. While HUD defines "essential services" widely, the City of Detroit requires all emergency shelters to provide the coordination of or direct case management services to all persons in housing crisis being served by their agency.

The cost of 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:

- Using the centralized or coordinated assessment system as required under § 576.400(d)
- Conducting the initial evaluation required under § 576.401(a), including verifying and documenting eligibility
- Counseling
- Developing, securing, and coordinating services and obtaining Federal, State, and local benefits
- Monitoring and evaluating program participant progress
- Providing information and referrals to other providers
- Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking
- Developing an individualized housing and service plan, including planning a path to permanent housing stability

Proof of case management services, including housing plans, case notes, etc., must be documented in the client's chart and HMIS when applicable.

Other allowable services under HUD's Essential Services Definition include the following. Please note that organizations must request City of Detroit approval prior to putting the following line items in their organizational budget:

Childcare

The cost of child care for program participants, including providing meals and snacks, and comprehensive and coordinated sets of appropriate developmental activities, are eligible. The children must be under the age of 13, unless they are disabled. Disabled children must be under the age of 18. The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.

Education Services

When necessary for the program participant to obtain and maintain housing, the costs of improving knowledge and basic educational skills are eligible. Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED). Component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies and instructional material; counseling; and referral to community resources.

Employment Assistance and Job Training

The costs of employment assistance and job training programs are eligible, including classroom, online, and/or computer instruction; on-the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to program participants in employment assistance and job training programs is an eligible cost. Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates. Services that assist individuals in securing employment consist of employment screening, assessment, or testing; structured job skills and job-seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; counseling or job coaching; and referral to community resources.

Outpatient Health Services

Eligible costs are for the direct outpatient treatment of medical conditions that are provided by licensed medical professionals. ESG funds may be used only for these services to the extent that other appropriate health services are unavailable within the community.

Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate medical treatment, preventive medical care, and health maintenance services, including emergency medical services; providing medication and follow-up services; and providing preventive and non-cosmetic dental care.

Legal Services

Eligible costs are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of the State in which the services are provided, and by person(s) under the supervision of the licensed attorney, regarding matters that interfere with the program participant's ability to obtain and retain housing.

ESG funds may be used only for these services to the extent that other appropriate legal services are unavailable or inaccessible within the community.

Eligible subject matters are child support, guardianship, paternity, emancipation, and legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking, appeal of veterans and public benefit claim denials, and the resolution of outstanding criminal warrants.

Component services or activities may include client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling.

Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient's employees' salaries and other costs necessary to perform the services.

Legal services for immigration and citizenship matters and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are ineligible costs.

Life Skills Training

The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance use, and homelessness are eligible costs. These services must be necessary to assist the program participant to function independently in the community. Component life skills training are budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting.

Mental Health Services

Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions. ESG funds may only be used for these services to the extent that other appropriate mental health services are unavailable or inaccessible within the community.

Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances. Problem areas may include family and marital relationships, parent-child problems, or symptom management.

Eligible treatment consists of crisis interventions; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.

Substance Abuse Treatment Services

Eligible substance abuse treatment services are designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors and are provided by licensed or certified professionals.

ESG funds may only be used for these services to the extent that other appropriate substance abuse treatment services are unavailable or inaccessible within the community.

Eligible treatment consists of client intake and assessment, and outpatient treatment for up to 30 days. Group and individual counseling and drug testing are eligible costs. Inpatient detoxification and other inpatient drug or alcohol treatment are not eligible costs.

Transportation

Eligible costs consist of the transportation costs of a program participant's travel to and from medical care, employment, child care, or other eligible essential services facilities. These costs include the following:

- The cost of a program participant's travel on public transportation.
- If service workers use their own vehicles, mileage allowance for service workers to visit program participants
- The cost of purchasing or leasing a vehicle for the recipient or subrecipient in which staff transports program participants and/or staff serving program participants, and the cost of gas, insurance, taxes, and maintenance for the vehicle.
- The travel costs of recipient or subrecipient staff to accompany or assist program participants to use public transportation.

Services for Special Populations

ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under paragraphs (a)(1)(i) through (a)(1)(x) of [24 CFR 576.102](#). The term *victim services* means services that assist program participants who are victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers and

domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.

Renovation/Rehabilitation of Buildings

Nonprofits and units of local government may use ESG funds to renovate or rehabilitate buildings for the use of the building as an emergency shelter.

Shelter providers seeking City of Detroit funds for shelter renovation cannot use their grant award in this manner without advance approval from the City of Detroit. Organizations who feel they need renovation assistance should reach out to their project manager to discuss their request.

Environmental clearance on properties is required in advance of starting work. Refer to Appendix I

Eligible costs include: labor, materials, tools, and other costs for renovation (including major rehabilitation of an emergency shelter or conversion of a building into an emergency shelter).

If the building is renovated with ESG funds, then it must be maintained as a shelter for individuals and families experiencing homelessness for a minimum period, dependent on the amount of funds used and work done. The City of Detroit requires subrecipients to sign a lien agreement that secures this pledge in writing.

Organizations must receive an environmental clearance from the City of Detroit prior to starting work. If a rehabilitation or conversion of the building to an emergency shelter costs more than 75 percent of the value of the building **prior** to work starting, then the restricted use period is for 10 years. This period begins once the work is completed and the first individual or family experiencing homelessness occupies the facility.

If the building is renovated and costs less than 75 percent of the value of the building **prior** to work starting, the restricted use period is reduced to 3 years. This period begins once the work is completed and the first individual or family experiencing homelessness occupies the facility.

Shelter Operations

Eligible costs are the costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, food, furnishings, and supplies necessary for the operation of the emergency shelter.

Health and Safety Protocol

All City of Detroit funded emergency shelters must have written policies and procedures that address emergency circumstances. Such circumstances include but are not limited to:

- Fire
- Natural Disasters
- First Aid and Emergency Protocols
- Infectious Disease Outbreak
- Pest Control
- Workplace Safety, Hygiene, and Hazardous Materials

Essential Services and Shelter Operations

Where the recipient or subrecipient uses ESG funds solely for essential services or shelter operations, the recipient or subrecipient must provide services or shelter to homeless individuals and families at least for the period during which the ESG funds are provided.

The subrecipient must seek prior approval from the City of Detroit if the shelter location identified in the original contract changes.

Implementing Assistance Under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA)

Minimizing Displacement

Consistent with other goals and objectives of ESG, subrecipients must assure that they have taken all reasonable steps to minimize the displacement of persons (families, individuals, businesses, nonprofit organizations, and farms) as a result of a project assisted under ESG.

Temporary Relocation Not Permitted

No tenant-occupant of housing (a dwelling unit) that is converted into an emergency shelter may be required to relocate temporarily for a project assisted with ESG funds or be required to move to another unit in the same building/complex. When a tenant moves for a project assisted with ESG funds under conditions that trigger the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), the tenant should be treated as permanently displaced and offered relocation assistance and payments consistent with URA.

Relocation Assistance for Displaced Persons

A displaced person must be provided relocation assistance at the levels described in, and in accordance with, the URA and [49 CFR 24](#). A displaced person must be advised of their rights under the Fair Housing Act. Whenever possible, minority persons shall be given reasonable opportunities to relocate to comparable and suitable decent, safe, and sanitary replacement

dwellings, not located in an area of minority concentration, that are within their financial means. This policy, however, does not require providing a person a larger payment than is necessary to enable a person to relocate to a comparable replacement dwelling. As required by Section 504 of the Rehabilitation Act and [49 CFR 24](#), replacement dwellings must also contain the accessibility features needed by displaced person with disabilities.

Displaced Person

The term “displaced person” means any person, family, individual, business, nonprofit organization, or farm, including any corporation, partnership, or association, that moves from real property, or moves personal property from real property, permanently, as a direct result of acquisition, rehabilitation, or demolition for a project assisted under the ESG program.

This includes any permanent, involuntary move for an assisted project, including any permanent move from the real property that is made:

- After the owner (or person in control of the site) issues a notice to move permanently from the property or refuses to renew an expiring lease, if the move occurs on or after:
 - The date of the submission by the City of Detroit or a subrecipient, as applicable, of an application for assistance to HUD (or the City of Detroit) that is later approved and funded if the City of Detroit or the subrecipient has site control as evidenced by a deed, sales contract, or option contract to acquire the property
 - The date on which the City of Detroit or subrecipient selects the applicable site, if the City of Detroit or subrecipient does not have site control at the time of application, provided that the City of Detroit or subrecipient eventually obtains control over the site.
- Before the date described in this section, if the City of Detroit or HUD determines that the displacement resulted directly from acquisition, rehabilitation, or demolition for the project
- By a tenant-occupant of a dwelling unit and the tenant moves after execution of the agreement covering the acquisition, rehabilitation, or demolition of the property for the project.

A person does not qualify as a displaced person if:

- The person has been evicted for cause based upon serious or repeated violation of the terms and conditions of the lease or occupancy agreement; violation of applicable federal, state, and local law, or other good cause; and the City of Detroit determines that the eviction was not undertaken for the purpose of evading the obligation to provide assistance.
- The person moved into the property after the submission of the application but before signing a lease and commencing occupancy was provided written notice of the project, its possible impact on the person (e.g., they may be displaced), and the fact that the person would not qualify as a “displaced person” as a result of the project.
- The person is ineligible under 49 CFR 24.2(a)(9)(ii).

- HUD determines that the person was not displaced as a direct result of acquisition, rehabilitation, or demolition of the project.

The City of Detroit or a subrecipient may, at any time, request that HUD determine whether a displacement is or would be covered by this rule. See [24 CFR 576.408](#) for more information.

Shelter Habitability and Lead Requirements

Emergency Shelter

All City of Detroit funded emergency shelters must have a current Certificate of Occupancy from the City of Detroit Building, Safety, and Engineering Department (BSEED) and shall comply with all applicable City, State, and Federal fire, environmental, health, and safety standards and regulations. When ESG funds are used under the emergency shelter component for renovation or shelter operations, the building must meet the minimum standards for safety, sanitation, and privacy. This applies to all ESG funds used under this component, including match funds. Grantees may also establish standards that exceed or add to these minimum standards:

- **Structure and materials:** The shelter building must be structurally sound to protect residents from the elements and not pose any threat to the health and safety of the residents. Any renovation (including major rehabilitation and conversion) carried out with ESG assistance must use Energy Star and WaterSense products and appliances.
- **Access:** The shelter must be accessible in accordance with Section 504 of the Rehabilitation Act (29 USC. 794), implementing regulations at [24 CFR part 8](#), the Fair Housing Act (42 USC. 3601 et seq.), and implementing regulations at [24 CFR part 100](#); and Title II of the Americans with Disabilities Act (42 USC. 12131 et seq.) and [28 CFR part 35](#); where applicable.
- **Space and security:** Except where the shelter is intended for day use only, the shelter must provide each program participant with an acceptable place to sleep and adequate space and security for themselves and their belongings.
- **Interior air quality:** Each room or space within the shelter must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.
- **Water supply:** The shelter's water supply must be free of contamination.
- **Sanitary facilities:** Each program participant in the shelter must have access to sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.
- **Thermal environment:** The shelter must have any necessary heating/cooling facilities in proper operating condition.
- **Illumination and electricity:** The shelter must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the shelter.

- Food preparation: Food preparation areas, if any, must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.
- Sanitary conditions: The shelter must be maintained in a sanitary condition.
- Fire safety:
 - There must be at least one working smoke detector in each occupied unit of the shelter. Where possible, smoke detectors must be located near sleeping areas.
 - The fire alarm system must be designed for hearing-impaired residents.
 - All public areas of the shelter must have at least one working smoke detector.
 - There must also be a second means of exiting the building in the event of fire or another emergency.

Lead-Based Paint Requirements

The ESG interim rule establishes the following regarding lead-based paint remediation and disclosure:

The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821- 4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851- 4856), and implementing regulations in [24 CFR part 35](#), subparts A, B, H, J, K, M, and R apply to all shelters assisted under ESG program and all housing occupied by program participants.

Under these regulations, facilities must be inspected to ensure there is no risk of exposure to lead-based paint hazards. If hazards are identified, action must be taken to address these hazards. If an emergency shelter falls under the definition of a zero-bedroom dwelling, it is exempt under the statute. Zero-bedroom dwelling is defined as follows:

Any residential dwelling in which the living areas are not separated from the sleeping area. The term includes efficiencies, studio apartments, dormitory or single room occupancy housing, military barracks, and rentals of individual rooms in residential dwellings.

The term “single room occupancy housing” is defined as follows:

Housing consisting of zero-bedroom dwelling units that may contain food preparation or sanitary facilities or both.

If an ESG-funded program provides shelter with units that have one or more bedrooms and receive assistance for more than 100 days, the program is required to establish and implement a policy that ensures that child-occupied spaces are free of lead-based hazards. If a program is exempt from the regulation (zero-bedroom units or receives assistance for 100 days or less), HUD recommends that policies to ensure lead safe living environments are implemented when units are occupied by children under six years old.

Emergency Shelter Operational Policies

All emergency shelters that receive funding from the City of Detroit must incorporate policies and protocol to ensure equality and the safety of all persons utilizing the homeless service system. Guidance is provided below on how shelter policies and requirements may be incorporated.

Religion

Religion plays an important role in many people's lives. Additionally, many homeless service system agencies were founded through religious organizations and mission driven activities. Regardless of an agency's background, any emergency shelter receiving City of Detroit funding must allow all persons staying in or receiving services to freely practice any religion or spiritual belief that they adhere to, or none at all if that is the case. In the cases of faith-based shelters that provide religious services, emergency shelter staff must clearly explain that any and all religious activities at the shelter are voluntary and not expected as a condition of stay.

Service Animals

Persons seeking emergency shelter or housing services **cannot** be denied based on their need for a service animal under the [American with Disabilities Act](#). Only dogs and some horses can be service animals (no other pets). There are no requirements that a service dogs must meet. In addition to the American with Disabilities Act, HUD's [Fair Housing Act](#) also applies to persons seeking or staying in emergency shelter. Under the Fair Housing Act, shelters receiving HUD funding cannot deny a person access to shelter or services based on their need for a support animal including for emotional support. To clearly distinguish between a support animal and a pet, emergency shelters may ask only two questions:

1. Does the person seeking to use and live with the animal have a disability?
2. Does the animal work, provide assistance, perform tasks or services for the benefit of a person with a disability, or provide emotional support that alleviates one or more of the identified symptoms or effects of a person's disability?

If the answer to question 1 or 2 is NO, a shelter is not required to make an accommodation. If the answer to question 1 **AND** 2 is YES, then both Section 504 of the American with Disabilities Act and HUD's Federal Fair Housing Act require the emergency shelter provider to make accommodations and allow the support animal to remain with its owner for the duration of the person's stay.

Emergency shelters and/or service providers cannot require additional documentation regarding the service animal or the nature of the person's disability.

Additional reasons for service animal denial

Answering yes to both questions listed above does not give a free pass for any animal to stay in emergency shelter. Shelters should have written policies outlining the determination of service animals as well as the control and care for which their owners need to be responsible.

Shelter policy should include the following:

- All service animals must be harnessed, leashed, tethered, or contained and under the control and guidance of their owner at all times.
- All service animals must behave properly, while on shelter/agency property.
- The animal's owner accepts all responsibility for the care and well-being of the animal including behavior, sanitation, and clean-up.
- Animals may be denied entrance to the shelter if:
 - The specific animal in question poses a direct threat to the health or safety of others that cannot be reduced or eliminated by another reasonable accommodation, or
 - The specific service animal in question would cause substantial physical damage to the property of others that cannot be reduced or eliminated by another reasonable accommodation.
- Breed, size, and weight limitations may not be applied to a service animal.

Shelter Resident Death

As death too is a fact of life, emergency shelters receiving City of Detroit funding must enact written protocol on staff procedures and documentation when a person in housing crisis dies on the premises. All agencies' protocol must include the following:

In case of death, staff should:

- Call 911.
- DO NOT move the person or touch anything in the vicinity of the body.
- Call a second staff member for support.
- Inform the Shelter Manager or supervisory personnel.
- The Shelter Manager or supervisory personnel is required to inform the senior level staff (e.g., Executive Director, Chief Operating Officer) as soon as possible.
- All staff involved in the incident must provide documentation of events and actions taken within 24 hours of death.
- Maintain confidentiality and composure. Even post-mortem, client information should not be made public or available to anyone outside the scope of their release of information.

Shelter Resident Personal Belongings

All City of Detroit funded emergency shelters funded are required to have written policies and procedures on personal belongings and property in possession of those seeking shelter.

Emergency shelters have the right to limit the amount or size of belongings either stored or transported in and out of shelter facilities. Shelters that choose to limit the amount of personal belongings should assist in locating alternative storage locations so that persons in housing crisis are not required to dispose of personal belongings as a condition of shelter stay.

Shelter Resident Money and Valuables

Persons residing in communal living spaces often have difficulty locating safe storage options for their valuables and/or money. City of Detroit funded emergency shelters must include in their policies a protocol for persons seeking shelter to store their money and or valuables in a safe location. Under no circumstances are staff of emergency shelter services allowed to hold or store valuables. Emergency shelters that do offer safe storage options for valuables should detail how items will be stored, the storage and retrieval processes, as well as the days and times that assigned staff will be available to safely store items.

Shelter Resident Prescription Medications

Emergency shelters funded by the City of Detroit are required to have written policies and procedures on prescription medication storage and distribution for persons staying in shelter. Shelters without on-site medical staff who are qualified to administer medication should include protocol on medication storage, access, and self-administration. Refrigeration should also be made available for all medications requiring it. Medications may not be stored in communal refrigeration or in unlocked areas. Appropriate record-keeping and client/staff login procedures should also be detailed in the shelter policies. Under NO circumstances are non-approved staff allowed to administer or distribute prescription medications.

Substance Use

While drugs and alcohol may not be allowed on the premises, Detroit's emergency shelters provide service to many clients who are actively using these substances as they need safe environments to stay in. Detroit emergency shelters aim to offer a non-judgmental approach that attempts to meet clients "where they are at" with their substance abuse. Instead of denying services to clients who are using, shelter and service providers must try to give opportunities for the clients to minimize the harms associated with substance abuse. Additionally, emergency shelter agencies must have written policy and procedures on **overdose detection and response**.

In cases where persons in housing crisis continue to use on site the following protocol should be followed:

- Staff will not ask clients to be abstinent, only inform clients that they cannot use in the shelter.
- Staff should help clients recognize that some ways of using substances are clearly safer than others.

- Staff should recognize that the realities of poverty, class, racism, social isolation, past trauma, sex-based discrimination, and other social factors affect clients' vulnerability to and capacity for effectively dealing with substance use.
- Staff should assist clients in accessing services appropriate to their needs.

Manufacturing, Distribution or Sales

Under no circumstances is manufacturing, distribution, or sale of any illegal or prescribed substance permitted in, on, or around City of Detroit emergency shelter facilities. Evidence of staff or persons seeking shelter involvement in these activities will result in removal from the property and may result in temporary or long-term refusal of services. If a resident is dismissed, the organization must report the discharge, suspension, or ban in the "incident" section in HMIS within 24 hours.

Weapons

Many persons requesting emergency shelter are forced to travel with all or most of their personal belongings. In some cases, persons requesting or staying in emergency shelters may have legal or illegal weapons in their possession. Shelter staff will make the determination as to what constitutes a weapon. Shelter staff must notify all persons entering shelter of their weapons policies. Each individual City of Detroit funded emergency shelter must have a written policy and procedure detailing both what constitutes a weapon and how staff should proceed once a weapon has been identified. Policies and practices on identifying and securing weapons must be clearly outlined in public spaces for persons seeking shelter or services to see and presented in a manner that is clear and easy to understand.

Work tools and any other devices which may be used in a way that could cause serious bodily injury must also be reported to shelter staff. Emergency shelter staff must notify all persons requesting entrance into shelter of weapons policies and procedures. Shelter staff will follow agency weapons protocol to ensure the safety of all persons being served. Attempts to bring weapons into a City of Detroit emergency shelter without notifying staff may result in an immediate denial of service or stay. If a resident is dismissed, the organization must report the discharge, suspension or ban in the "incident" section in HMIS within 24 hours.

Violent Behavior

The City of Detroit strongly encourages staff to use de-escalation practices in any tense or escalating emergency shelter situation. Emergency shelter policy and procedures will outline shelter protocol for both de-escalation practices and for when a situation escalates to an unsafe environment. Such protocols may include:

- A client will be told to leave the shelter when staff has witnessed the person, or s/he has admitted to, being violent or physically intrusive inside the shelter, or s/he has repeatedly targeted another individual. This includes:
 - Hitting, kicking, slapping, pushing
 - Throwing objects at someone

- Any unwanted physical contact
- Being verbally abusive repeatedly to the same person

Shelter Policy may read:

1. Staff will intervene in a conflict in the shelter and encourage those involved to resolve disagreements respectfully, offer to mediate, and name abusive behavior.
2. Staff will prioritize being in common areas with clients when tensions are high.
3. Whenever possible, the decision to tell a client to leave should be discussed with the manager or another support worker.
4. When a client has assaulted anyone in the shelter or been physically intrusive or aggressive (including unwanted touching) and staff have seen it, or the person has admitted it, s/he must leave.
5. Staff should be honest with the client about why s/he is being asked to leave. If possible, help the person with their plans and provide him/her with alternatives. Staff should remain non-judgmental.
6. The client may react angrily and staff may be the target of that anger. If a staff member is concerned about personal safety and s/he is on shift alone, call in another staff person before talking with the client and, if necessary, notify the police. Notify the Shelter Manager immediately and complete an Incident Form.
7. Report discharge, suspension, or ban in the "Incidents" section in HMIS within 24 hours.

Intake Procedures for Emergency shelters

Hours of Operation

All Emergency shelters will operate 7 days a week and clearly state and/or display hours of operation. Shelter intake hours and supportive services hours will be clearly defined and advertised to avoid client confusion and disorientation.

Shelters not operating on a 24-hour basis will create and implement a policy for extension of their operating hours during inclement weather and during designated emergency situations including, but not limited to:

- Severe weather
- Natural disasters
- Other such situations as designated by governmental authorities

Shelter beds will be held for a period of one night of a person's absence from shelter. Extenuating circumstances require pre-approval. All shelters should have a clear process for holding beds in the case of extenuating circumstances. re

Intake Procedures

Intake procedures on persons presenting in housing crisis must be administered consistently and equally, regardless of disability or other personal characteristics. See *Documenting Homelessness* for rules and procedures.

All shelters should inform clients about shelter rules in writing. Clients should be requested to sign off that they received these rules.

During the intake process, emergency shelter providers must refrain from asking questions about disabilities and other protected information until it has been made clear to the client(s) that they have been admitted into the program.

After the initial intake process is complete, staff should inform each client that answering the HMIS questions is voluntary and that any information gathered is for HMIS purposes only. Staff should clarify that answering the HMIS questions will not affect the client's ability to stay in the shelter or access services provided through the program.

Lack of adequate staffing to complete an intake is not an appropriate condition for refusal to accept a referral of client presenting for shelter. In such cases, providers should collect as much information as practical and complete the full assessment as soon as possible.

After an applicant has been approved for admittance into a shelter or service, it is permissible to ask the person about disability and other health-related issues ONLY if it pertains to program eligibility or as part of a reasonable accommodation request. It is a good practice to have the post-acceptance questioning regarding disability and other supportive service needs conducted by a supportive services staff member instead of a housing management staff member.

The City of Detroit expects that all funded emergency shelters work to create a welcoming environment for persons entering in housing crisis. Such environments may include (but are not limited to):

- Welcoming persons as they enter the shelter
- Introducing staff when first meeting persons in housing crisis
- Making the first move to engage persons in need. (Don't wait for people to come to you for help.)
- Ensure that all discussions that include personal information or business are conducted in as private of a space as possible.
- Maintain a clean and orderly environment.

Reminder: All emergency shelters receiving HUD funding are required by federal law to adhere to HUD's [Equal Access Rule](#). The Equal Access Rule provides protection for any person or family seeking emergency shelter and removed barriers to access based on gender identity and family composition. No exceptions will be made to the requirements under the law. The

City of Detroit stands firmly that all persons requesting shelter and utilizing shelter services are treated with the utmost respect and dignity. Discrimination of any kind will not be tolerated within the Detroit Homeless Service System. Refer to the definitions section in the earlier part of this Manual for additional guidance.

Provision of Services

Case Management Services

While the immediate goal of emergency shelter is to ensure that those in housing crisis are sheltered and safe, once this has been established shelter providers are expected to help residents leave the facility as quickly as possible to permanent housing. All shelters are expected to have access to housing case management services on site and provide clients with linkages to other assistance such as mental or physical health treatment, legal services, and more. Housing case management services and the documentation of them must include, at a minimum, the following:

- Brief case notes to document services provided to clients.
- A housing plan (Appendix J) that was created within 14 days of shelter entry, either via HMIS or on paper, to document client housing goals and support needed to achieve the goal.
 - At minimum, housing plans must be updated every 90 days.
- Client case management progress records in HMIS and/or the client chart. Case management progress must be made available for review.
 - Prior to grant award, organizations should designate whether they will be tracking services via HMIS or a paper chart.

Special Population Considerations

Recommending persons in housing crisis to other programs because they have a disability is called steering and it is illegal discrimination. While all persons in housing crisis should have access to the full range of homeless system services, there are specific populations that may require special attention.

Serving Unique Populations

Families with School-Aged Children

The educational needs of children and youth must be accounted for, to the maximum extent practicable. Families with children and unaccompanied youth must be placed as close as possible to the school of origin so as not to disrupt the children's education. Projects that serve homeless families with children and/or unaccompanied youth must have policies and practices in place that are consistent with the laws related to providing education services to children and youth. These recipients must have a designated staff person to ensure that children and youth are enrolled in school and receive education services. Homeless families

with children and unaccompanied youth must be informed of their eligibility for McKinney-Vento education services and other available resources. Recipients shall maintain documentation in the participant's case file to demonstrate that these requirements have been met and that applicants and clients understand their rights.

Mandated Reporting

The Michigan Child Protection Law, 1975 PA 238, MCL 722.621 et. seq., requires the reporting of child abuse and neglect by certain persons (called mandated reporters) and permits the reporting of child abuse and neglect by all persons. The [Child Protection Law](#) includes the legal requirements for reporting, investigating, and responding to child abuse and neglect. This document is to assist mandated reporters in understanding their responsibilities under the Child Protection Law. For copies of the Child Protection Law, contact the local Michigan Department of Health and Human Services (MDHHS) office or go to www.michigan.gov/mdhhs.

Shelter providers and service coordination staff may be considered mandated reporters under the statute. Please refer to above mentioned documents for clarification. Regardless of staff capacity, all City of Detroit funded emergency shelters are required to have written policies and procedures outlining protocol for when child abuse is suspected or witnessed.

Criminal History

While permissible to inquire about a person's criminal convictions, Emergency Shelter providers should keep the following in mind:

- What is the programmatic intent of the questions being asked?
- Will additional barriers be created as a result of these questions?
- Are all applicants asked the same questions?

It is important that a shelter provider uniformly reject all applicants with the same criminal history (except in those cases in which a reasonable accommodation has been granted). If there are specific convictions that would warrant a rejection, this information should be clearly articulated in the organization's policies and procedures to ensure that they are enforced in a standardized way. Barriers to entry should be avoided to the greatest extent possible.

Alcohol and Substance Use and Abuse

Alcoholism and past illicit drug use are considered disabilities under Federal Fair Housing laws and are not a basis for denying a person housing and/or shelter. Emergency shelter providers are prohibited from asking a prospective client/household if they have history of either alcohol abuse or illegal drug use during intake. Additionally, asking a shelter resident with a known history of past drug or alcohol abuse to prove that they are not still using is **illegal**. Fair housing laws prohibit questions about treatment or requests for verification that a person is no longer using. Stereotypes about people with substance abuse disabilities (such as, "once

a user, always a user”) must not be used to make decisions about access to shelter. Current illegal drug use is a permissible topic that an emergency shelter provider may question a prospective shelter resident about only if the same question(s) are posed to each prospective shelter resident. Current illegal drug use is not a protected disability under fair housing laws, however, emergency shelter providers cannot single out certain individuals for questions about current illegal drug use.

HIV/AIDS

Fair housing laws recognize HIV-positive status as a disability. Discrimination of any kind against people with HIV or a violation of their right to confidentiality is illegal. While shelter providers may be aware of one or more HIV-positive individuals, there could also be other individuals with HIV receiving shelter. To prevent the spread of HIV, universal precautions against transmission should be taken at all times. Universal precautions are procedures used to handle the blood, body fluids, open skin or mucous membranes (e.g., inside of the mouth or nose) of all individuals, regardless of whether they are known to have HIV or hepatitis. Such precautions allow the isolation of potentially harmful fluids, without isolating individuals.

Universal precautions include:

- Treating all blood and body fluids as if they are infected with HIV or hepatitis
- Wearing latex gloves when touching blood or body fluids
- Using bleach to clean up any blood spillages
- Washing hands with soap and running water after removal of gloves
- Disposing of latex gloves by rolling them up and placing them in plastic bags. Universal precautions can be posted above sinks and in other locations in shelters for all staff and residents to follow.

Ask a local AIDS service organization or contact the federal Centers for Disease Control for more detailed information or pamphlets about universal precautions.

Exit Policies for Shelter Residents

Persons in Housing Crisis Should be Banned from Shelter Only as a Last Resort

The City of Detroit recognizes that emergency shelter is used by persons who are in housing crisis. Staff must find a balance in providing a safe, communal environment and serving persons who are both entering with high vulnerability and long histories of trauma. If a client has repeated instances of inappropriate behavior that jeopardizes the safe and communal atmosphere of the shelter, a client may be given warnings; placed on daily assess or evicted; or barred for a period of time. All emergency shelters will have written policies and procedures that detail termination of services and reflect the following:

Warnings

If a person utilizing emergency shelter services disregards a shelter policy and is not receptive to being told by staff that it is unacceptable behavior, they will be given a warning. It is important that the person be made clearly aware of why they are being given the warning. If the person receives too many warnings about the same unacceptable behavior they may be asked to leave. However, if a person has several warnings on file, but on different topics, then they will not be asked to leave.

Daily Assessments

This indicates that there were significant issues that arose during the current or recent previous stay of a client. If the incidents occurred during their previous stay, the client should be made aware that the shelter will closely monitor their behavior related to the daily assessments, as a condition of the shelter offering space. If for example, there was drug paraphernalia found in the client's things when a person moved out, then the alcohol and drug policy should be reviewed during the intake. The client may also be given fewer warnings about their behavior during their stay and may be asked to leave sooner if they are unable to follow the guidelines of the shelter during this new stay. Daily assessment of a person's behavior will be logged in client files or as part of HMIS reporting.

Suspension

A "suspension" is defined here as an action whereby a homeless service provider restricts shelter and/or services to a person in housing crisis for up to three (3) days. If the person is in need of shelter, the suspending agency is responsible for making a referral to the CAM Access Point to be connected with available shelter beds. Any person/household suspended from a City of Detroit funded-emergency shelter must be recorded in the HMIS system within 24 hours of the suspension in order to prevent future referrals.

Ban

A "ban" is defined here as an action whereby a homeless service provider refuses shelter and/or services to a client for more than three (3) days.

A service provider has the right and responsibility to protect the safety of their staff and persons in housing crisis and may resolve a hazardous situation as they see fit. In extreme cases, such as physical violence or the use of a weapon, it is clearly understood that any of the agency's authorized staff may choose to suspend a person for cause. During that time, a ban may or may not be considered.

Disciplinary action shall be proportional to the infraction. A ban shall be used in only the most intractable of circumstances because of the devastating effect losing services has on a person.

Each agency shall designate those staff authorized to ban a person in housing crisis, preferably those with social service and conflict management skills. The agency shall have a goal of objectivity in the process and utilize bans only as a last resort.

All organizations are expected to have clearly outlined policies that describe when and how people would be banned. Policies and procedures regarding the banning process shall:

- Be developed and approved by the City of Detroit
- Be easily understandable to persons in housing crisis and shared upon entry
- Be conspicuously posted and periodically communicated to both frontline staff and to persons in need of emergency shelter services and:
 - State that a decision to ban cannot be unilaterally made. Recommendations on banning must be approved by a two-step process.
 - Include an appeals process. If a client is banned, they shall have the right to appeal to a senior authority at the agency.
 - Incorporate the Grievance Procedure.
- If a ban is to be imposed, the agencies shall make every attempt to communicate the following to the person in writing:
 - The reason for the ban
 - The duration of the ban
 - Any conditions or stipulations imposed
 - A referral to an alternative service provider, if feasible. (The agency shall make every attempt to find the client an available alternative agency that provides equivalent services or keep a record of why the referral was not possible.)
 - A description of the agency's appeals process; and a copy of the Grievance Procedures.
 - The client shall be notified that they have a right to file a grievance with the shelter provider if they believe they have been treated unjustly.
 - Records: For each banning incident, confidential standardized records shall be kept. Emergency shelter staff will report all persons banned into HMIS within 24 hours to ensure the person in housing crisis does not get referred back to the same shelter.
 - Time Limit: Any person who is banned for more than a six-month period may file an appeal with the agency six months from the date of his or her discharge and again every six months after that.

While bans are made at the agency level, it is imperative that this information should also be shared with CAM as the entity that places clients in shelter programs. Within 24 hours of the decision to ban a client, this information must be entered in HMIS via incidents tab on the client profile. This allows for successful placement but also for an effective risk assessment for the City of Detroit homeless service system as a whole. Bans will not be honored unless entered in HMIS.

Participant Discharge/ Termination of Assistance

If an ESG program participant violates program requirements, a homeless service system agency may terminate assistance given that they follow a formal process that has been established by the agency. The process must recognize the rights of the individuals affected and subrecipients must exercise judgment and examine all extenuating circumstances when determining which violations warrant termination. Assistance should only be terminated in the most severe cases.

Discharge Procedure

The goal of emergency shelter is both to provide a safe environment for person in housing crisis AND to provide services and coordination that ensure that a person's housing crisis is rare and brief. Emergency shelters that receive City of Detroit funding must develop discharge policies and procedure that detail reasons for discharge, staff efforts, and exit location and connection to services. The City of Detroit emergency shelters must ensure that when service is terminated, either voluntarily or involuntarily, employees follow an orderly and respectful process.

Discharge may occur when the person in housing crisis:

- Achieves their goals and is ready to discontinue service
- No longer wants to stay at the shelter and receive service
- Refuses to adhere to the policies and procedures of the shelter (e.g., violent behavior or weapons possession)
- Has needs that exceed the resources and expertise of the shelter

Detroit emergency shelters should consider implementing the following:

Discharge Checklist

As a person prepares for discharge, staff should use the following checklist to ensure an orderly and comprehensive discharge and file closing process:

- Wrap up case planning with the client
- Complete a discharge/aftercare plan with the person exiting
- Record the reason for discharge
- Make appropriate referrals where external aftercare is required
- Ensure all personal property in the person's file is returned to the them
- Enter a closing summary in the person's HMIS file within two days of discharge.

Closing Summary

A closing summary entered into the person's record must be documented in HMIS by staff within two days of departure. The closing summary should include:

- The reason for discharge
- Service goals and outcomes
- Plans for follow-up
- Other summary comments as appropriate

Involuntary Discharge

In some cases, Emergency shelter staff may require a person to be discharged on an involuntary emergency basis. The Shelter Manager must sign off on the decision to ask a person/household to leave. Employees have an obligation to assist such exiting households in linking to other appropriate services prior to leaving the shelter. This may include, among other things, making referrals or providing resources to self-refer. Staff should always remain non-judgmental in their approach to the client. Be honest with the person about why they are being asked to leave.

A person in housing crisis may react angrily to the involuntary discharge and staff may be the target of that anger. If there are concerns that this may happen, staff should ensure that there is another staff person or support person with them during the procedure.

Appeal Process

If a person in housing crisis expresses a concern or makes a complaint concerning their involuntary discharge, they may take the following steps:

1. Discuss the matter fully with the Shelter Manager, who will decide on any corrective action required within the boundaries of his/her authority. The Shelter Manager will notify the Executive Director of the person's concerns and the action taken.
2. If still unsatisfied with the outcome, the person/household may submit a request for intervention to the Executive Director, who will acknowledge receipt within five days. The Executive Director will take any corrective action required within 10 days and inform the client, in writing, of the resolution.
3. Individuals/households have the right to ask assistance of another person to speak on their behalf or help fill out a grievance form.
4. Individuals/household grievances are reported in monthly reporting to the City of Detroit. The Shelter Advisory Committee reserves the right to review grievances quarterly and annually to provide review that does not involve the person about whom the complaint was made or the person who reached the decision.
5. Copies of all documents are placed in the client file.

Emergency Shelter Client Files

General Program Documentation

Every client who has received a direct service from an ESG subrecipient must have a client file that documents the reason(s) for the assistance. Each file must include the documentation in the list below.

Required File Documentation

- A VI-SPDAT assessment by Coordinated Assessment Model staff
- Signed HMIS Release(s) (for all adult members of the household)
- Verifications of Homelessness or At Risk of Homelessness that align to the project with which they are involved (third party certification or self-declaration, plus backup documentation) or proof of self-certification of homelessness sign-in sheet and process
- Initial Consultation Form
- If the shelter has identified the resident as chronically homeless in HMIS, all supportive documentation to verify this must be included in the file.
- Case Notes (minimum of monthly case notes)
- Individualized Housing and Service Plan (see appendix ___)
- Income Verification including backup documentation (Paystubs, third party verifications, etc.)
- As applicable, determinations of ineligibility (e.g., if client requests services and is deemed ineligible or declines services, written explanation of why the client was ineligible or declined services, along with any rights of appeal they may have).

All information required above must be completed in HMIS unless an organization receives a waiver from the City of Detroit prior to contract start.

Other Emergency Shelter Documentation

Documentation of compliance with the applicable requirements for providing service and assistance ([24 CFR 576.102](#)) includes:

- Case Management Documentation: Assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant. The following must be documented:
 - Initial evaluation
 - Eligibility
 - Counseling
 - Program participant progress
 - Information and referrals to other providers
 - Ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking
- Child Care Documentation: Child care provided for program participants
 - Meals and snacks provided
 - Appropriate developmental activities provided

- Verification that the child care center is licensed
- Education Series Documentation: Document the costs of improving knowledge and basic educational skills
 - Instruction or training in consumer education
 - Instruction or training in health education
 - Substance use prevention instruction or training
 - Instruction or training in literacy
 - English as a second language instruction or training
 - General Education Development (GED) instruction or training
 - Component services or activities such as: screening, assessment, and testing; individual or group instruction; tutoring; provision of books, supplies and instructional material; counseling; and referral to community resources
- Employment Assistance and Job Training Documentation
 - Employment assistance and job training programs, including: classroom, online, and/or computer instruction; on-the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential.
 - Stipends provided to program participants in employment assistance and job training programs
 - Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.
 - Services that assist individuals in securing employment include: employment screening, assessment, or testing; structured job skills and job seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; and counseling or job coaching.
 - Referrals to community resources
- Outpatient Health Services Documentation: Document direct outpatient treatment of medical conditions provided by licensed medical professionals.
- Legal services Documentation
 - Legal advice provided
 - Verification that attorney is licensed and in good standing with the bar association
 - Matters that interfere with the program participant's ability to obtain and retain housing. Eligible subject matters are child support, guardianship, paternity, emancipation, and legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking, appeal of veterans and public benefit claim denials, and the resolution of outstanding criminal warrants.
- Life skills training documentation: Document life skills training necessary to assist the program participant to function independently in the community (e.g., budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting).
- Mental health services Documentation: Document direct outpatient treatment by licensed professionals of mental health conditions.

- Substance use treatment services documentation
 - Substance use treatment services designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors
 - Verification that treatment providers are licensed or certified professionals
 - Duration of outpatient treatment (up to 30 days)
 - Group and individual counseling sessions
 - Drug testing
- Transportation Documentation
 - Transportation of a program participant to and from medical care, employment, child care, or other eligible essential services facilities
 - Program participant's travel on public transportation

Section 8: Homelessness Prevention and Rapid Re-Housing Introduction

Summary

The City of Detroit encourages subrecipients to use ESG funds to implement activities that focus on and ensure the ongoing housing stability of program participants, rather than using funds to exclusively provide one-time emergency rent or utility assistance. Subrecipients should use ESG funds to target individuals and families who are living on the streets or in emergency shelters and focus on rapidly re-housing them into permanent housing.

Rapid Re-Housing ensures that emergency shelter resources are available to individuals and families who are most vulnerable in the community and as a result, the City of Detroit encourages subrecipients to give Rapid Re-Housing the highest priority under ESG. ESG programs should be designed to focus on Rapid Re-Housing while broadening existing homelessness prevention activities, with the overall goal of assisting program participants in obtaining and maintaining permanent housing.

Subrecipients should be able to demonstrate that program participants have the household income necessary to successfully maintain their housing prior to exiting them from ESG-funded programs and activities (unless a participant is terminated due to violating program requirements according to the formal termination process established by the subrecipient).

Homelessness prevention and Rapid Re-Housing are broadly divided into the two same assistance components:

- Housing relocation and stabilization services
- Short-term and medium-term rental assistance

The difference between the two eligible components is the housing status of the individual or family at the point of entry into the project. Under the HUD homeless definition, if the individual/family is considered category 1 or category 4 (where the individual also meets the eligibility criteria for category 1) the household is entered into a Rapid Re-Housing project. If the individual/family is considered category 2 or 4 (but not meeting category 1 as above) or at risk of homelessness, then they are entered into a homeless prevention project.

Section 9: Homelessness Prevention

Summary

Homeless prevention services are most effectively implemented when targeted to those at greatest risk of losing housing. Households should demonstrate that they do not have sufficient resources or support networks to prevent them from moving to an emergency shelter or other place defined under category 1 of the homeless definition.

Enrollment in a prevention program typically lasts around 2-6 months, although enrollments can be longer. ESG subrecipients should negotiate with landlords as the first step in resolving eviction crises. Providers should focus on a case management plan to ensure long-term stability for program participants. Providers are expected to implement a case management plan that will increase household incomes and/or increase access to mainstream benefits for program participants (e.g., SOAR, SNAPs, TANF).

The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing and achieve stability in that housing.

Homeless Prevention participants must have an annual income that is below 30 percent of the annual median family income for the area.

NEW

Performance Benchmarks

These benchmarks are expectations of prevention providers and will be integrated into ongoing programmatic monitoring:

- Percentage of clients in the program for 3 months or less;
- Percentage of clients who exit to a permanent housing destination; and
- Percentage of clients that enter into homelessness within 1 year of program exit.

Rental Assistance for Homelessness Prevention

Program participants may receive up to 24 months of rental assistance during any 3-year period. This assistance may be short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance.

Rental assistance may be tenant-based or project-based.

1. Short-term rental assistance is assistance for up to 3 months of rent.
2. Medium-term rental assistance is assistance for more than 3 months but not more than 24 months of rent. **However, beginning January 1, 2020, at least 85% of all clients must be enrolled in the program for 3 months or less.**

NEW

3. Payment of rental arrears consists of a one-time payment for up to 6 months of arrears, including any late fees.

NOTE: Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance or living in a housing unit receiving project-based rental assistance or operating assistance through other public sources (such as Housing Choice Voucher/Section 8 or other public housing).

Housing Relocation and Stabilization Services

Financial Assistance

ESG funds may be used to pay housing owners, utility companies, and other third parties for the costs listed below. Note that this does not include any direct payments to the applicants/resident.

Security Deposits

ESG funds may pay for a security deposit that is equal to no more than 1.5 months' rent.

Last Month's Rent

If necessary to obtain housing for a program participant, then the last month's rent may be paid from ESG funds to the owner of that housing at the time the owner is paid the security deposit and the first month's rent. This assistance must not exceed one month's rent and must be included in calculating the program participant's total rental assistance (which cannot exceed 24 months during any 3-year period).

Utilities

No program participant shall receive more than 24 months of utility assistance within any 3-year period.

Utility Deposits

ESG funds may pay for a standard utility deposit required by the utility company including the following utilities:

- Gas
- Electric
- Water
- Sewage

Utility Payments

ESG funds may pay for up to 24 months of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service. A partial payment of a utility bill counts as one month. This assistance may only be provided if the program participant or a member of the same household has an account in their name with a utility company or proof of responsibility to make utility payments. Eligible utility services are gas, electric, water, and sewage.

Rental Application Fees

ESG funds may pay for the rental housing application fee if it is a standardized fee charged to all applicants, not just those in an ESG program.

Moving Costs

ESG funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance under housing stabilizations services and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.

Stabilization Services

ESG funds may be used to provide specific supportive services to eligible households. These services may be provided with or without the provision of financial or rental assistance, for a maximum of 24 months.

ESG funds may be used to provide the following categories of stabilization services:

Housing Search and Placement

For participants who need assistance finding or securing housing, ESG funds may support the services or activities necessary to assist them in locating, obtaining, and retaining suitable permanent housing. These activities include:

- Assessment of housing barriers, needs, and preferences
- Development of an action plan for locating housing
- Housing search
- Outreach to and negotiation with owners
- Assistance with submitting rental applications and understanding leases
- Assessment of housing for compliance with ESG requirements for habitability, lead-based paint, and rent reasonableness/FMR as described above
- Assistance with obtaining utilities and making moving arrangements
- Tenant counseling

Housing Stability Case Management

ESG funds may be used to pay costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing. Funds may also be used to assist a program participant in overcoming immediate barriers to obtaining housing.

Case management assistance cannot exceed 30 days during the period that the program participant is seeking permanent housing.

Whether paid for with ESG funds or not, housing stability case management should be provided as needed to support households to regain housing stability and link them to other services in the community. The program must, at minimum, develop a plan to assist the program participant to retain permanent housing after the ESG assistance ends. The plan should take into account all relevant considerations, including: the program participant's current or expected income and expenses; other public or private assistance for which the program participant will be eligible and likely to receive; and the relative affordability of available housing in the area.

Case management services are intended to be flexible and respond to the participant's needs, while leveraging other services in the community as much as possible. During their enrollment in the program, participants must meet with a case manager not less than once per month to work towards long-term housing stability.

Mediation

ESG funds may pay for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the participant from losing permanent housing in which they currently reside.

Legal Services

Component services or activities may include client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling.

Eligible Subject Matters: These include child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; and the resolution of outstanding criminal warrants. **Eligible Costs:** Eligible costs are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of the State in which the services are provided, and by person(s) under the supervision of the licensed attorney, regarding matters that interfere with the program participant's ability to obtain and retain housing. Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible

costs are the program's employees' salaries and other costs necessary to perform the services.

Legal services for immigration, citizenship matters, and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are also ineligible costs.

Credit Repair

ESG funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.

Homeless Prevention Client Files

General Program Documentation

Every client who has received a direct service from an ESG subrecipient must have a client file that documents the reason(s) for the assistance. Each file must include the documentation listed below.

All Client Files

- An assessment by either project staff or Coordinated Assessment Model staff
- Signed HMIS Release(s) (for all adult members of the household)
- Verifications of At Risk of Homelessness that align to the project with which they are involved (third party certification or self-declaration, plus backup documentation)
- Initial Consultation Form
- Case Notes (minimum of monthly case notes)
- Individualized Housing and Service Plan
- Income Verification including backup documentation (paystubs, third-party verifications, etc.)
- As applicable, determinations of ineligibility (e.g., if client requests ESG services and is deemed ineligible or declines services, written explanation of why the client was ineligible or declined services, along with any rights of appeal they may have).

Homelessness Prevention Specific Forms

- Lead compliance documentation
- Current unit Inspection Report (Habitability)
- Signed lease containing client's name(s)
- Rent agreement (with landlord)
- Rent reasonableness/FMR documentation
- Documentation of services and assistance provided to the client, including, as applicable, the security deposit, rental assistance, and utility payments made on behalf of the client

- Copies of financial assistance payments (including type of assistance, payee name, client name, check number, and amount paid using ESG funds)
- Staff certification of eligibility

Housing Inspection Requirements

Subrecipients cannot use ESG funds to help a program participant remain in or move into housing that does not meet certain standards. Depending on the situation, the City of Detroit has determined that subrecipients must use either the Housing Quality Standards (HQS) form or the Habitability Standards form.

Both HQS and habitability inspections must be conducted by a qualified ESG recipient or subrecipient staff or contractor. Program participants may not conduct inspections.

In addition:

- If an eligible household needs homelessness prevention assistance to remain in its existing unit, the assistance can only be provided if that unit meets habitability standards.
- If an eligible household needs homelessness prevention assistance to move to a new unit, the assistance can only be provided if the new unit meets the housing quality standards (HQS).
- Minimum standards must be met even if one-time assistance is provided (e.g., rental arrears, security deposit, etc.).
- The subrecipient must be sure to document compliance with the ESG habitability standards or housing quality standards (whichever is applicable) in the program participant's file.

ESG habitability standards cover 10 areas of review to ensure that the housing is minimally habitable. These 10 areas are:

- **Structure and materials** - The structures must be structurally sound to protect residents from the elements and not pose any threat to the health and safety of the residents.
- **Space and security** - Each resident must be provided adequate space and security for themselves and their belongings, and an acceptable place to sleep.
- **Interior air quality** - Each room or space must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.
- **Water supply** - The water supply must be free from contamination.
- **Sanitary facilities** - Residents must have access to sufficient sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.
- **Thermal environment** - The housing must have any necessary heating/cooling facilities in proper operating condition.

- **Illumination and electricity** - The structure must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the structure.
- **Food preparation** - All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.
- **Sanitary conditions** - The housing must be maintained in a sanitary condition.
- **Fire safety** - There must be a second means of exiting the building in the event of fire or other emergency. Each unit must include at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit. Smoke detectors must be located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is occupied by hearing impaired persons, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person. The public areas of all housing must be equipped with a sufficient number, but not less than one for each area, of battery-operated or hard-wired smoke detectors. Public areas include, but are not limited to, laundry rooms, community rooms, day care centers, hallways, stairwells, and other common areas.

A checklist tool for ensuring that permanent housing standards are met can be found here: <https://www.hudexchange.info/resources/documents/ESG-Emergency-Shelter-and-Permanent-Housing-Standards-Checklists.docx>

HQS standards can be found in Appendix F.

Lead-Based Requirements

If a building or unit was built before 1978, there is a possibility it has lead-based paint. In 1978 the federal government banned consumer uses of lead-containing paint, but some states banned it even earlier. Lead from paint, including lead-contaminated dust, is one of the most common causes of lead poisoning.

Organizations that receive funds for Homelessness Prevention **MUST** comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and they must implement regulations in [24 CFR part 35](#), subparts A, B, H, J, K, M, and R.

ESG regulations state that a lead-based paint visual assessment must be completed for all units that meet the three following conditions:

- The household living in the unit is being assisted with ESG financial assistance (rent assistance, utilities assistance, utility/security deposits, or arrears).
- The unit was constructed prior to 1978.
- A child under the age of six or a woman who could become pregnant is or may be living in the unit.

These regulations apply regardless of whether a household is staying in an existing unit or moving to a new unit and they must be complied with prior to providing ESG assistance. They must also be complied with (and assessments completed) annually thereafter.

ESG subrecipients are responsible for ensuring that property owners and managers meet the lead-based paint requirements. It may be helpful for subrecipients to think about the requirements in two categories, outlined below.

1. **Disclosure Requirements** - Disclosure requirements are triggered for ALL properties constructed prior to 1978. These requirements require that lessors (property owners or managers) provide tenants with:
 - [Disclosure form for rental properties disclosing the presence of known and unknown lead-based paint](#)
- AND**
- A copy of the [“Protect Your Family from Lead in the Home” pamphlet](#)

This requirement actually relates to property owners/managers but sharing this information with program participants (or ensuring they have received it) is an easy thing to do and is recommended for ESG subrecipients.

2. **The Visual Assessment** - Staff may become a HUD-Certified Visual Assessor by successfully completing a [20-minute online training](#) through HUD’s website. Depending on the results of the visual assessment, additional steps may be required before assistance can be provided for that unit. The unit needs to be brought into compliance. There are certain exceptions to the rule. Visual assessments are not triggered under the following circumstances:
 - It is a zero-bedroom or SRO-sized unit.
 - X-ray or laboratory testing of all painted surfaces by certified personnel has been conducted in accordance with HUD regulations and the unit is officially certified to not contain lead-based paint.
 - The property has had all lead-based paint identified and removed in accordance with HUD regulations.
 - The client is receiving federal assistance from another program, where the unit has already undergone a visual assessment within the past 12 months (e.g., if the client has a Section 8 voucher and is receiving ESG assistance for a security deposit or arrears). NOTE: In such cases, ESG staff are required to obtain documentation that a visual assessment has been conducted by the agency administering the other assistance. This documentation should be added to the ESG case file.
 - It meets any of the other exemptions described in [24 CFR Part 35.115\(a\)](#).

If any of the conditions outlined above are met, a staff member simply needs to document the condition and place a copy in the participant’s case file.

If a visual assessment reveals problems with paint surfaces, program staff cannot approve the unit for assistance until the deteriorating paint has been repaired. At this point, program staff must make a decision: 1) work with the property owner/manager to complete needed paint stabilization activities and clearance, 2) work with the household to locate a different (lead-safe) unit, or 3) refer the client to a different program if ESG assistance cannot be provided.

Fair Market Rent and Rent Reasonableness Requirements

Rental assistance may only be provided for housing units for which the total rent does not exceed the fair market rent (FMR) established by HUD, as provided under [24 CFR 982.503](#). The total rent for the unit must also comply with HUD's standard of rent reasonableness, as established under [24 CFR 982.507](#). These rent restrictions are intended to ensure that program participants can remain in their housing after their ESG assistance ends.

Rent reasonableness and FMR requirements do not apply when a program participant receives only financial assistance or services under Housing Stabilization and Relocation Services. This includes rental application fees, security deposits, an initial payment of last month's rent, utility payments/deposits, moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, legal services, and credit repair.

Note that this guidance only applies to ESG homeless prevention and Rapid Re-Housing. For guidance on CoC rules regarding FMR and rent reasonableness, please consult the following [HUD Exchange resource](#).

For more information about calculating rent reasonableness and FMR, please review this [HUD Exchange Resource](#).

Rent Reasonableness

The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units.

In many areas, the easiest way to determine rent reasonableness is to use a housing database search engine that will compare units and rents against one another. One option is [Michigan Housing Locator](#). Other local resources may also be used to obtain information, such as market surveys, classified ads, and information from real estate agents. When comparing rent reasonableness, the proposed unit must be compared to three other units.

Fair Market Rent (FMR)

FMRs are gross rent estimates. The U.S. Department of Housing and Urban Development (HUD) annually estimates FMRs for 530 metropolitan areas and 2,045 nonmetropolitan county areas.

HUD sets FMRs to assure that a sufficient supply of rental housing is available to program participants. By law, HUD is required to publish new FMRs at the start of each federal fiscal year on October 1.

Fair Market Rents are updated by HUD every year and can be found online at:

<http://www.huduser.org/portal/datasets/fmr.html>

Documentation of Income (Homelessness Prevention)

Documentation of income is required for Homelessness Prevention programs at intake and at each recertification (i.e., every 3 months).

For FY2017, the income limits for ESG (i.e., the 30% Income Limit) can be found on the [HUD Exchange](#) website. Do not use HUD’s Extremely Low-Income Limit; this is different than the 30% Income Limit used for ESG. These income limits are updated annually (typically in the spring of each year) and take effect as soon as they are announced by HUD.

For clients receiving Homelessness Prevention services, subrecipients must calculate the annual income of the individual or family (as described in [24 CFR 5.609](#)). These regulations are summarized in the following charts.

When calculating income, subrecipients should note the following:

- All adults (persons 18 and over) must have documentation of income (even if there is no income).
- One or more of the below documents must be kept in the client/household file.
- If there is more than one adult in a household, documentation must be provided for each adult household member.
- If an adult has more than one income source or job, each source of income should have its own documentation (e.g., paystubs for employment and TANF benefit letter).

Documentation Options by Income Types				
Income Source	Include in Income Calculation?	Third Party	Oral Verification	Self-Declaration
No Income Reported	Yes	Copy of Social Security Statement obtained through http://www.socialsecurity.gov/mystatement/ AND Signed Declaration of No Income	N/A	Client completes Self Declaration of No Income

Wages and Salary	Yes GROSS Pay (Not Net Pay)	Copy of Recent Paystubs OR Signed Letter from Employer (including gross pay amount, frequency, average hours, and contact information)	Staff contacts employer and completes Oral Verification of Income	Client completes Self Declaration of No Income
Self-Employment/ Business Income	Yes NET Income (Not Gross Pay)	Copy of most recent federal or state tax return showing net business income	N/A	Client completes Self Declaration of No Income
Interest and Dividend Income	Yes GROSS Pay (Not Net Pay)	Copy of most recent interest or dividend income statement OR Copy of most recent federal or state tax return showing interest, dividend, or other net income	N/A	Client completes Self Declaration of No Income
Pension/ Retirement Income	Yes GROSS Pay (Not Net Pay)	Copy of most recent payment statement or benefit notice from Social Security Administration (SSA), pension provider, or another source	Staff contacts provider and completes Oral Verification of Income	Client completes Self Declaration of No Income
Unemployment Income	Yes GROSS Pay (Not Net Pay)	Copy of most recent unemployment or severance payment statement notice	Staff contacts provider and completes Oral Verification of Income	Client completes Self Declaration of No Income
Disability Income	Yes GROSS Pay (Not Net Pay)	Copy of most recent worker's compensation, SSI, or SSDI payment	Staff contacts provider and completes Oral Verification of Income	Client completes Self Declaration of No Income
Temporary Assistance for Needy Families (TANF) or other Cash Public Assistance	Yes GROSS Pay (Not Net Pay)	Copy of most recent payment statement or benefit notice	Staff Contacts Provider and completes Oral Verification of Income	Client completes Self Declaration of No Income

Alimony, Child Support, Foster Payment	Yes GROSS Pay (Not Net Pay)	Copy of most recent alimony, foster care, child support or other contributions or gift payment statements, notices, or orders	Staff contacts provider, family member, or court, and completes Oral Verification of Income	Client completes Self Declaration of No Income
Armed Forces Income	Yes GROSS Pay (Not Net Pay)	Copy of payment statement or other government issued statement indicating income amount	Staff contacts provider and completes Oral Verification of Income	Client completes Self Declaration of No Income

The following table describes the types of income that are not counted when calculating gross income for purposes of determining ESG eligibility and documentation.

Income Exclusions by Income Types	
General Category	Description
1. Income of Children	Income from employment of children (including foster children) under the age of 18 years.
2. Inheritance and Insurance Income	Lump-sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains and settlement for personal or property losses (except as provided in Pension/Retirement Income).
3. Medical Expense Reimbursements	Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member.
4. Income of Live-in Aides	Income of a live-in aide (as defined in 24 CFR 5.403).
5. Disabled Persons (only in HOME Properties)	Certain increases in income of a disabled member of qualified families residing in HOME-assisted housing or receiving HOME tenant-based rental assistance (24 CFR 5.617).
6. Student Financial Aid	The full amount of student financial assistance paid directly to the student or to the educational institution.
7. Armed Forces Hostile Fire Pay	The special pay to a family member serving in the Armed Forces who is exposed to hostile fire.

8. Self-Sufficiency Program Income	a. Amounts received under training programs funded by HUD.
	b. Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS).
	c. Amounts received by a participant in other publicly assisted programs that are specifically for, or in reimbursement of, out-of-pocket expenses incurred (special equipment, clothing, transportation, childcare, etc.) and which are made solely to allow participation in a specific program.
	d. Amounts received under a resident service stipend. A resident service stipend is a modest amount (not to exceed \$200 per month) received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to: fire patrol, hall monitoring, lawn maintenance, resident initiatives coordination, and serving as a member of the PHA's governing board. No resident may receive more than one such stipend during the same period of time.
	e. Incremental earnings and benefits received by any family member for participation in qualifying state or local employment training programs (including training not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives and are excluded only for the period during which the family member participates in the employment training program.
9. Other Non-recurring Income	Temporary, nonrecurring, or sporadic income (including gifts). Sporadic wages or employment income should be included in the income calculation.
10. Reparations	Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era.
11. Income from Full-time Students	Annual earnings in excess of \$480 for each full-time student 18 years old or older (excluding the head of household or spouse).
12. Adoption Assistance	Adoption assistance payments in excess of \$480 annually per adopted child.
13. Deferred/Lump Sum Social Security & SSI Income	Deferred periodic amounts from SSI and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts.

14. Income Tax and Property Tax Refunds	Amounts received by the family in the form of refunds or rebates under state or local law for property taxes paid on the dwelling unit.
15. Home Care Assistance	Amounts paid by a state agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep this developmentally disabled family member at home.

16. Other Federal Exclusions

Amounts specifically excluded by any other federal statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under any program to which the exclusions of [24 CFR 5.609\(c\)](#) apply, including:

- The value of the allotment made under the Food Stamp Act of 1977;
- Payments received under the Domestic Volunteer Service Act of 1973 (employment through VISTA, Retired Senior Volunteer Program, Foster Grandparents Program, youthful offender incarceration alternatives, senior companions);
- Payments received under the Alaskan Native Claims Settlement Act;
- Income derived from the disposition of funds to the Grand River Band of Ottawa Indians;
- Income derived from certain submarginal land of the United States that is held in trust for certain Indian tribes;
- Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program;
- Payments received under the Maine Indian Claims Settlement Act of 1980 (25 U.S.C. 1721);
- The first \$2,000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the U.S. Claims Court and the interests of individual Indians in trust or restricted lands, including the first \$2,000 per year of income received by individual Indians from funds derived from interests held in such trust or restricted lands;
- Amounts of scholarships funded under Title IV of the Higher Education Act of 1965, including awards under the Federal work-study program or under the Bureau of Indian Affairs student assistance programs;
- Payments received from programs funded under Title V of the Older Americans Act of 1985 (Green Thumb, Senior Aides, Older American Community Service Employment Program);
- Payments received on or after January 1, 1989, from the Agent Orange Settlement Fund or any other fund established pursuant to the settlement in the In Re Agent Orange product liability litigation, M.D.L. No. 381 (E.D.N.Y.);
- Earned income tax credit refund payments received on or after January 1, 1991, including advanced earned income credit payments;
- The value of any child care provided or arranged (or any amount received as payment for such care or reimbursement for costs incurred for such care) under the Child Care and Development Block Grant Act of 1990;
- Payments received under programs funded in whole or in part under the Job Training Partnership Act (employment and training programs for Native Americans and migrant and seasonal farm workers, Job Corps, state job training programs and career intern programs, AmeriCorps);
- Payments by the Indian Claims Commission to the Confederated Tribes and Bands of Yakima Indian Nation or the Apache Tribe of Mescalero Reservation;
- Allowances, earnings, and payments to AmeriCorps participants under the National and Community Service Act of 1990;
- Any allowance paid under the provisions of 38 U.S.C. 1805 to a child suffering from spina bifida who is the child of a Vietnam veteran;
- Any amount of crime victim compensation (under the Victims of Crime Act) received through crime victim assistance (or payment or reimbursement of the cost of such assistance) as determined under the Victims of Crime Act because of the commission of a crime against the applicant under the Victims of Crime Act.

Documentation of Lack of Resources (At Intake)

When providing Homelessness Prevention assistance, subrecipients must demonstrate that the program participant does not have sufficient resources or support networks (e.g., family, friends, faith-based, or other social networks) immediately available to prevent them from moving to an emergency shelter or an unsheltered destination. Acceptable documentation generally includes:

- Notice of termination from employment
- Unemployment compensation statement
- Bank statement
- Health-care bill showing arrears
- Utility bill showing arrears
- Other third-party documentation illustrating lack of resources
- Written statement by the relevant third party (e.g., former employer, public administrator, relative)
- Written statement of program staff of phone call or other verbal communication with relevant third-party source (if written documentation is unavailable)

Recertification of Income and Lack of Resources

Homeless Prevention funded through the Detroit ESG and CoC program will conduct programmatic evaluations of all participants every 90 days. The Detroit Continuum has elected to complete income evaluations quarterly for programs funded with both ESG and CoC funds. Regularly scheduled participant evaluations for Homeless Prevention must include:

- Evidence that the program participant does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD (see the [HUD Income Eligibility Calculator](#)).
- Evidence that program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance.

Calculating Rental and Program Assistance Payments

Subrecipients are expected to take a progressive engagement approach to serving each client. This means that the subrecipients review the needs of the individual or family to determine what level of assistance they need to move forward towards independent living in the community, and no more. Assistance levels should be documented in the file and explained to the client so that they have a full understanding of the support provided by the subrecipient.

This approach should be documented within the subrecipient's operational policies and procedures as part of the written standards, which should be available to the client. Subrecipients should take care to ensure that this approach is uniform and that clients with the same level of needs receive the same level of assistance.

The level of assistance can be adjusted to provide more or less support depending on the client's needs. The level should be adjusted based on ongoing assessments conducted primarily by the case manager.

Subrecipients may decide to enforce a policy where they require client contribution to the rental assistance. Subrecipients may decide to calculate the rental assistance in accordance with [section 3\(a\)\(1\) of the US Housing Act of 1937 \(42 U.S.C. 1437a\(a\)\(1\)\)](#). Under these regulations, a family's rent payment will be 30 percent of the family's monthly adjusted income or 10 percent of the family's monthly income - whichever is higher.

Leases and Rental Assistance Agreements

Each program participant receiving rental assistance through ESG must have a legally binding, written lease for the rental unit, unless the assistance is solely for rental arrears. The lease must be between the owner and the program participant. Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease if the agreement gives the program participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the owner's financial records, rent ledgers, or canceled checks.

In addition, a rental assistance agreement is required between the subrecipient and the landlord. A subrecipient may make rental assistance payments only to an owner with whom the subrecipient has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply under this section. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the subrecipient 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.

The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease.

The rental assistance agreement with the landlord must terminate and no further rental assistance payments under that agreement may be made if:

1. The program participant moves out of the housing unit for which the program participant has a lease.
2. The lease terminates and is not renewed.
3. The program participant becomes ineligible to receive ESG rental assistance.

The subrecipient must make timely payments to each owner in accordance with the lease and rental assistance agreement. The subrecipient is solely responsible for paying late payment penalties that it incurs with non-ESG funds.

Section 10: Rapid Re-Housing

Summary

Rapid Re-Housing programs are designed to help those who are experiencing homelessness transition into permanent housing. The primary goal is to stabilize a program participant in permanent housing as quickly as possible and to provide wrap-around services after the family or individual obtains housing. Once a participant is enrolled, Rapid Re-Housing programs should rely heavily on a case management plan to ensure long term stability for program participants. Providers are expected to implement a case management plan that will increase household incomes and/or increase access to mainstream benefits for program participants.

Linkages should also be made to applicable mainstream programs such as SOAR, food stamps, TANF, and other programs as applicable. In most cases, households who have entered a Rapid Re-Housing program have applied for a Housing Choice Voucher through the Michigan State Housing Development Authority. In such cases, ensuring the tenant obtains their vouchers and leases up a unit is of tantamount importance both for that tenant's long-term self-sufficiency and for those in shelter who would benefit from Rapid Re-Housing. This is a key part of the case management.

Rapid Re-Housing Benchmarks and Goals

In an effort to provide the highest quality of service and support to households in crisis the City of Detroit and Detroit CoC have designed the following benchmarks for success and programmatic monitoring for all ESG-funded RRH programs. These benchmarks include:

- Rapid Re-Housing programs must attempt to contact client within three days of referral.
- Rapid Re-Housing clients must move into housing within 60 days of program entry so long as funds are available.
- Rapid Re-Housing staff will engage in face-to-face case management services with clients at least every 30 days.
- Rapid Re-Housing participant home visits will be made once every 90 days, at a minimum.
- Percentage of client that exit to a permanent housing destinations; and
- Percentage of client who exit within 180 days.



NEW

Additionally, the Continuum of Care has developed the following benchmarks to track in an effort to create future performance expectations and monitoring reviews:

- The percentage of program participants that are able to maintain housing without Rapid Re-Housing assistance by 180 days
- The percentage of those served that are not literally homeless after one year

- The percentage of Rapid Re-Housing households that increase income from program entry to exit
- The percentage of exiting households who return to homelessness as measured at six month and one year intervals

Determining Rapid Re-Housing Participant Eligibility

Referrals

100% of all referrals to the City of Detroit’s Rapid Re-Housing programs will be provided through Detroit’s Coordinated Assessment Model (CAM), per the City of Detroit’s Rapid Re-Housing Written Standards.

Rapid Re-Housing Prioritization and Referral Process

Clients who score for Rapid Re-Housing on the VI-SPDAT are prioritized according to the following factors:

1. Clients who are unsheltered
2. Clients who are fleeing domestic violence
3. Clients who are currently in emergency shelter

When there are multiple clients with the same score in any of these 3 categories and not enough RRH resources available for all of them, clients will be prioritized in the following order:

- A. Family status
 1. Families
 2. Singles Adults
- B. Length of time homeless
 1. Longest length of time homeless to shortest length of time

The prioritization factors are subject to change according to community need. Any changes to prioritization factors will be communicated by the Homeless Action Network of Detroit and will be included in the Manual’s annual updates.

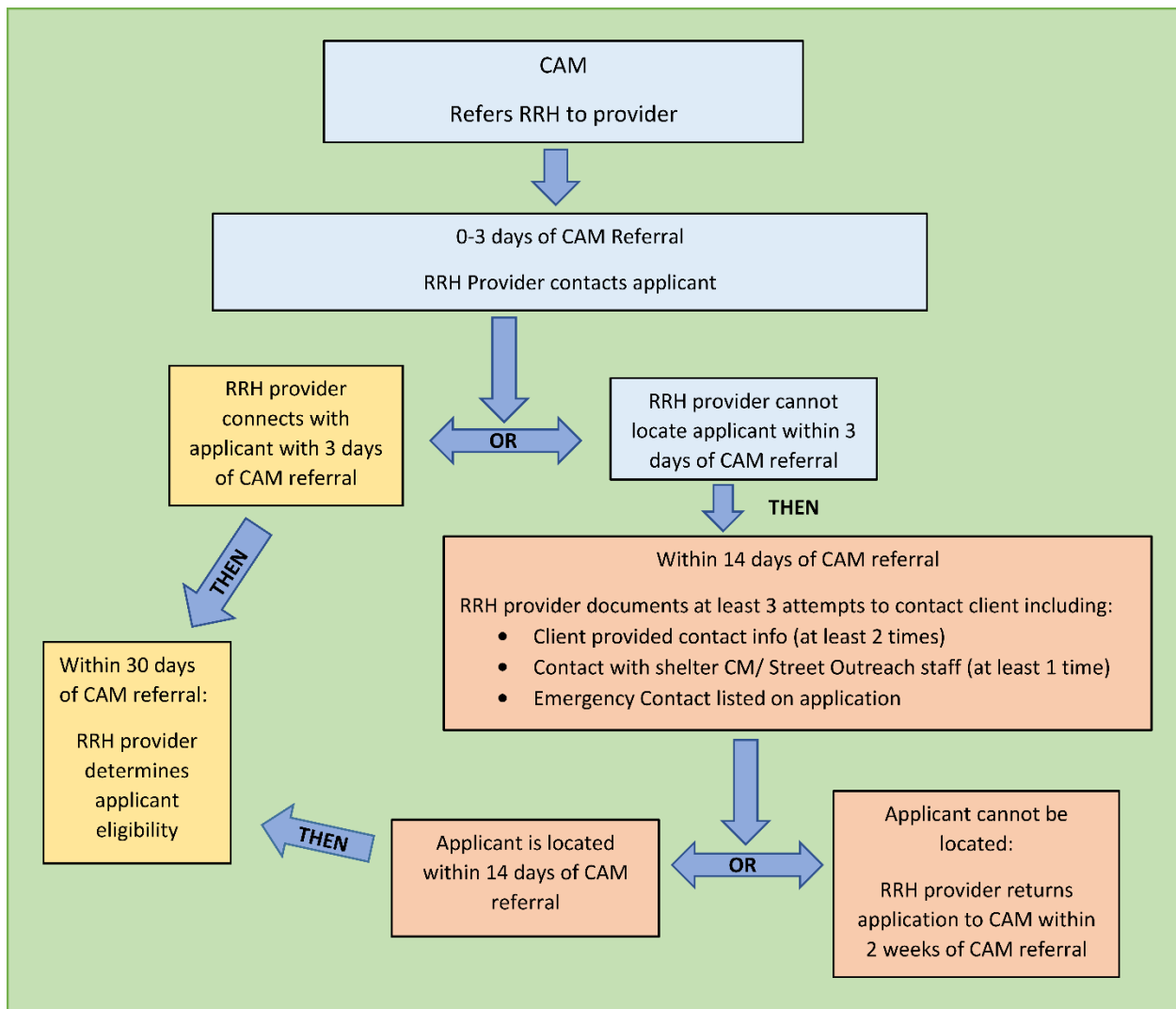
Housing Choice Voucher (HCV) - Security Deposit Only

Participants seeking assistance with Security Deposit Only may be eligible for financial assistance without prioritization or waitlist placement. Applications for Security Deposit Only may be assisted at any time if program funds are available. **Rapid Re-Housing providers should assess the financial status of Security Deposit Only referrals to determine if there is a demonstrated need for this assistance prior to providing the service.**

Referral to Rapid Re-Housing Providers

Referrals are driven by program capacity. As soon as a provider is aware of an opening, they can request a referral from the CAM. Clients will be referred at a ratio of 1 applicant:1 available Rapid Re-Housing opening.

Once a referral is made, the Rapid Re-Housing providers will maintain the following schedule:



Note: For applicants that cannot be located within 14 days, CAM will return the client referral to an inactive list for possible referral at a later date. Returns are sent to the inactive list by providers by marking the client as “declined” (if client was ineligible or refused the project) or “cancelled” (if client was unable to be contacted) in HMIS and noting the specific reason the referral was declined or cancelled. In cases where referrals are returned, attempts at contact should be clearly documented in HMIS.

Clients may remain on the Rapid Re-Housing inactive waitlist for up to three months, with the opportunity to be reactivated if they reappear. However, reactivated clients will not move directly to the top of the list. Instead, the client referral would be reordered based on their prioritization scores.

Documentation of Eligibility

Clients can be referred via CAM regardless of whether they have all required documentation at time of referral. **The only documentation required at referral is verification of homelessness, which should be uploaded into the client's HMIS record.**

- Upon first contact, Rapid Re-Housing provider will utilize HMIS data to verify that the client is still experiencing homelessness. If HMIS data is unavailable, the client is to complete a self-statement of homelessness (Appendix D) prior to eligibility determination.

Please note, lack of personal verification documentation shall not prevent entry into the Rapid Re-Housing program. However, it is the expectation of the RRH program providing services to secure third-party verification of identity within 90 days of program entry.

The following documents should be collected or obtained when possible to determine Rapid Re-Housing program eligibility:

- Photo identification for Head of Household and all household members age 18 and over. This can be a federal, state, or municipally issued form of picture ID.
- Birth Certificates for all children in household (Medicaid card can substitute)
- Social Security Cards

If any of the above documents are missing during housing search and placement process, case management should still move forward. Case managers should complete the Missing Documentation Form (Appendix E). This form provides the opportunity for self-certification of identity. All missing documents are expected to be obtained with support from the case manager by the three-month recertification date.

If a client is eligible for Veteran Services, then the CAM will refer to Supportive Services for Veteran Families (SSVF). If not eligible for Veteran Services, then the CAM will follow established prioritization for Rapid Re-Housing.

Rapid Re-Housing Programs Referral Refusals

If there is a conflict of interest between a staff member and a referred individual, every effort should be made to reassign the referral to a non-conflict staff person.

An individual Rapid Re-Housing program may refuse a program referral if the applicant was previously served by the Rapid Re-Housing program and the program can demonstrate that the client was terminated for violation of health and safety of staff and/or community.

If there are other extenuating circumstances, providers should reach out to their City of Detroit grant manager via email to request approval to refuse a referral.

Rapid Re-Housing Program Transfers

Beginning in January 2020, *agencies will no longer be allowed to transfer clients into City of Detroit Rapid Re-Housing programs with the following exceptions:*

- MSHDA ESG transfers
- RRH programs that are closing are exempt and therefore are allowed to transfer clients into another City of Detroit RRH program.

Due to eligibility requirements, clients can only be transferred INTO City of Detroit ESG programs. CoC eligibility does not allow for transfers from ESG programs. Transfer requests initiated by program participants will undergo processes as outlined in the appeal procedures described within this Policies and Procedures Manual.

Additional appeal guidance is as follows:

- All transfer requests will be reviewed by the Detroit CoC Rapid Re-Housing Committee. Transfers will be granted on a case-by-case basis. Transfers will be considered for the following circumstances:
 - Closure of participant's current Rapid Re-Housing Program/provider due to loss of grant dollars (MSHDA, ESG or CoC-funded) prior to household completion of the program.
 - Program does not have the financial resources to meet the client's needs (MSHDA RRH programs only).

The following documentation must be used in the transfer process:

- Must use City of Detroit Rapid Re-Housing transfer form
- Move-in date must be tracked in HMIS
- Transfer form must be uploaded into client's HMIS record
- Client must recertify for assistance within 5 business days of transfer regardless of recertification due date

Rapid Re-Housing Referral and HMIS

Definition of terms in HMIS:

- *Accepted* - Client referral accepted (intake appointment scheduled)
- *Waitlisted* - Client did not use their referral
- *Declined* - Client referral declined due to ineligibility (client refusal reason for decline must be provided)
- *Cancelled* - Client was unable to be contacted or did not show up for intake appointment (per contact parameter outlined in this Manual).

Post Referral HMIS Workflow

Below are the expected steps providers should take in HMIS after a referral has been requested from CAM:

1. Run HMIS referral report for the current referral period.
2. Compare HMIS referral report to referral confirmation email received from CAM.
 - a. If any discrepancies exist, contact CAM immediately
3. Attempt to contact client upon receipt of referral and document attempts to contact in the “Case Notes” section of the summary page.
 - a. There should be at least **two** documented contacts using the contact info provided by client.
 - b. There should be least **one** documented contact to the shelter case manager/street outreach provider.
 - c. If applicable, there should be at least **one** documented contact to any other contact listed for client in HMIS
4. Once contact with the client is made, schedule intake with client and complete the referral outcome as “accepted” in HMIS.
5. If the client is unable to be contacted after the documented process outlined in number three, complete the referral outcome as “cancelled” in HMIS. CAM will run a referral report to note any cancelled referrals, check for documented attempts at contact, and move client to inactive if attempts at contact have been sufficiently made.
6. Upon intake with client, complete a Program Entry in the applicable specific program bin. All clients with accepted referrals should have a Program Entry (noting intake has taken place) within 30 days of a referral being made.
 - a. If client is found to be ineligible or refuses services at the point of intake:
 - i. Complete the referral outcome as “declined” in HMIS.
 - ii. Complete an entry in the “RRH Outcomes/Client Status” sub-assessment on the summary page with the following information:
 1. RRH Client Status: Client denied for RRH
 2. If Denied-Reason: Select the reason for denial
7. Once intake has been completed and client is enrolled in program, select “yes” next to “client currently in RRH program?” and complete an entry in the “RRH Outcomes/Client Status” sub-assessment on the summary page with the appropriate information reflecting the status of the case.

8. While working with the client toward housing (after the client is enrolled in the program):
 - a. Document all case notes in the “Goals” section of HMIS under the “Case Plans” tab.
 - b. Complete an entry in the “RRH Outcomes/Client Status” sub-assessment on the summary page once per month or as client status changes.

Client Files

General Program Documentation

Every client who has received a direct service from an ESG subrecipient must have a client file that documents the reason(s) for the assistance. Each file must include the documentation listed below.

Use of Standardized Rapid Re-Housing Forms

To ensure continuity across programs and providers, Rapid Re-Housing providers receiving CoC or City of Detroit ESG funds are expected to use the program forms uploaded on the Homeless Action Network of Detroit (HAND) website (link in the appendix). Although forms can be personalized to include the organization logo, the content should remain the same.

Needed RRH Client Files

- An assessment by Coordinated Assessment Model staff
- Signed Releases of Information for:
 - Housing Service Plan
 - HMIS Client Consent (enter information into HMIS and share with agencies)
 - Agency Client Release of Information
- Lease (once housed, a copy of the household’s signed lease should be included in the file)
- Proof of rent reasonableness
- Lead notification, if applicable
- Verification of U.S. Citizenship or Lawful Resident (Declaration of Section 214 or U.S. Identification)
- Verifications of Homelessness or At Risk of Homelessness that align to the project with which the client is involved (third-party certification or self-declaration, plus backup documentation)
- Initial Consultation Form
- Income Verification including backup documentation (paystubs, third-party verifications, etc.)
- As applicable, determinations of ineligibility (e.g., if client requests ESG services and is deemed ineligible or declines services, a written explanation of why the client was ineligible or declined services along with any rights of appeal they may have should be documented).

If identity verification documents are not all available at the time of client entry, a self-certification of identity must be included in the file. All identity documents should be placed in the file when obtained.

Client File Maintenance

Case Notes and Client Contact Requirements

All Rapid Re-Housing and Sustainability Coordination activities will be documented in case notes in the client case file. Case notes will include, at a minimum:

- Date, location, and purpose of the activity
- Progress on housing goals
- Documentation of appointments, meetings, home visits, phone calls, letters with members of the household, landlord and other service providers
- For contacts with anyone other than a member of the household, a signed release of information must be included in the case file indicating consent for exchange of information.
- Referrals made, including: date of referral, name of referral, and reason for referral
- Documentation of minimum monthly contact with the household
- Indication that the housing service plan has been reviewed and updated a minimum of once per month
- Documentation of activities related to program exit

Housing Relocation and Stabilization Services

ESG Eligible RRH Activities

Financial Assistance

ESG funds may be used to pay housing owners, utility companies, and other third parties for the costs listed below. Note that this does not include any direct payments to the applicants/resident.

Security Deposits

ESG funds may pay for a security deposit that is equal to no more than 2 months' rent.

Last Month's Rent

If necessary to obtain housing for a program participant, then the last month's rent may be paid from ESG funds to the owner of that housing at the time the owner is paid the security deposit and the first month's rent. This assistance must not exceed one month's rent and must be included in calculating the program participant's total rental assistance (which cannot exceed 18 months during any 3-year period).

Utilities

No program participant shall receive more than 24 months of utility assistance within any 3-year period.

Utility Deposits

ESG funds may pay for a standard utility deposit required by the utility company including the following utilities:

- Gas
- Electric
- Water
- Sewage

Utility Payments

ESG funds may pay for up to 18 months of utility payments per program participant, per service, including up to 6 months or \$2500 of utility payments in arrears, whichever comes first, per service. A partial payment of a utility bill counts as one month. This assistance may only be provided if the program participant or a member of the same household has an account in their name with a utility company or proof of responsibility to make utility payments. Eligible utility services are gas, electric, water, and sewage.

Rental Application Fees

ESG funds may pay for the rental housing application fee if it is a standardized fee charged to all applicants, not just those in an ESG program.

Moving Costs

ESG funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance under housing stabilizations services and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.

Stabilization Services

ESG funds may be used to provide specific supportive services to eligible households. These services may be provided with or without the provision of financial or rental assistance, for a maximum of 24 months.

ESG funds may be used to provide the following categories of stabilization services:

Housing Search and Placement

For participants who need assistance finding or securing housing, ESG funds may support the services or activities necessary to assist them in locating, obtaining, and retaining suitable permanent housing. These activities include:

- Assessment of housing barriers, needs, and preferences
- Development of an action plan for locating housing
- Housing search
- Outreach to and negotiation with owners
- Assistance with submitting rental applications and understanding leases
- Assessment of housing for compliance with ESG requirements for habitability, lead-based paint, and rent reasonableness/FMR as described above
- Assistance with obtaining utilities and making moving arrangements
- Tenant counseling

Housing Stability Case Management

ESG funds may be used to pay costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing. Funds may also be used to assist a program participant in overcoming immediate barriers to obtaining housing.

Case management assistance cannot exceed 30 days during the period that the program participant is seeking permanent housing.

Whether paid for with ESG funds or not, housing stability case management should be provided as needed to support households to regain housing stability and link them to other services in the community. The program must, at minimum, develop a plan to assist the program participant to retain permanent housing after the ESG assistance ends. The plan should take into account all relevant considerations, including: the program participant's current or expected income and expenses; other public or private assistance for which the program participant will be eligible and likely to receive; and the relative affordability of available housing in the area.

Case management services are intended to be flexible and respond to the participant's needs, while leveraging other services in the community as much as possible. During their enrollment in the program, participants must meet with a case manager not less than once per month to work towards long-term housing stability.

Mediation

ESG funds may pay for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the participant from losing permanent housing in which they currently reside.

Legal Services

Component services or activities may include client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling.

- **Eligible Subject Matters:** These include child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; and the resolution of outstanding criminal warrants.
- **Eligible Costs:** Eligible costs are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of the State in which the services are provided, and by person(s) under the supervision of the licensed attorney, regarding matters that interfere with the program participant's ability to obtain and retain housing. Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the program's employees' salaries and other costs necessary to perform the services.

Legal services for immigration, citizenship matters, and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are also ineligible costs.

Credit Repair

ESG funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.

Detroit RRH Supportive Services

The City of Detroit standard is that the Rapid Re-Housing programs should not exceed a client ratio of 1:25. For City of Detroit ESG awards, budgets should reflect appropriate staffing to match these case management ratios and ensure an adequate level of service for households being served in Rapid Re-Housing.

- Rapid Re-Housing programs require a face to face visit with Rapid Re-Housing clients every 30 days
 - At minimum, a home visit should be completed every 90 days as part of the quarterly recertification.
 - All Rapid Re-Housing participants will be recertified for program income eligibility every 90 days of participation.
 - The Detroit written standards allow for households over income (30% AMI) at 90-day recertification to remain in the program until the annual recertification. At that time, rental assistance must be terminated.
 - Engagement in services is voluntary (except for monthly check in)

- Providers should utilize progressive engagement to provide the fullest extent of services necessary to help participants reach identified goals.
- Initial housing plan will be drafted with client at project entry.
 - Housing plans will be updated within 30 days of moving into housing.
- The role of Rapid Re-Housing staff in case management services is as follows:
 - Be an active partner in housing search, providing the level of support necessary to help participant household obtain housing.
 - Understand and help remove barriers to housing
 - Removing barriers to housing
 - Design a housing plan
 - Meet with tenant least once per month
 - Complete home visits at least every 90 days
 - Connect to mainstream resources
 - Employment support
 - Review and update housing plan monthly
 - HCV recertification to maintain eligibility
 - Upon notification of that client has been pulled from the HCV waitlist, assist in obtaining and completing HCV and transition from RRH subsidy to HCV.
- If the tenant is facing a threat of eviction, creation of a Tenant/Landlord Mediation Plan/Stabilization plans using form 23

Expectations for Rapid Re-Housing Staff Training

In order to ensure high quality service provision for those receiving Rapid Re-Housing, agencies administering Rapid Re-Housing programs within the Detroit CoC will document Rapid Re-Housing staff participation in training and stay current on relevant topics, including:

- HUD Regulatory Requirements
- ESG Regulatory Requirements
- Housing First
- Motivational Interviewing
- Fair Housing/ Equal Access/ Housing Law
- Safety Protocol

During the monitoring process, organizations will be asked to provide the detail of their annual staff training policy and protocol as well as information on the on-boarding process for new employees.

The City of Detroit strongly encourage organizations to utilize any and all available training provided via the Continuum of Care to meet these training expectations.

Rental Assistance for Rapid Re-Housing

Program participants may receive up to 24 months of rental assistance during any 3-year period, according to Federal regulation. However, it is important to note that **the City of Detroit's ESG program has limited the length of Rapid Re-Housing financial assistance to a maximum of 18 months.** This assistance may be short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance.

Rental assistance may be tenant-based or project-based.

1. Short-term rental assistance is assistance for up to 3 months of rent.
2. Medium-term rental assistance is assistance for more than 3 months but not more than 18 months of rent. **However, beginning January 1, 2020 households entering into City of Detroit RRH programs will be limited to no more than 12 months RRH services.**
3. Payment of rental arrears consists of a one-time payment for up to 6 months of arrears, including any late fees.



NEW

NOTE: Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance or living in a housing unit receiving project-based rental assistance or operating assistance through other public sources (such as Housing Choice Voucher/Section 8 or other public housing).

Documentation of Income - Rapid Re-Housing

For clients receiving Rapid Re-Housing, documentation of income *at intake* is not required. However, it is required for recertification every 3 months (90 days).

For FY2017, income limits for ESG (30% Income Limit) can be found on the [HUD Exchange](#) website (do not use HUD's Extremely Low Income Limit; this is different than the 30% Income Limit). These income limits are updated annually (typically in the spring of each year) and take effect as soon as they are announced by HUD.

Subrecipients must calculate the annual income of the individual or family (as described in [24 CFR 5.609](#)). These regulations are summarized in the following charts.

When calculating income, subrecipients should note the following:

- All adults (persons 18 and over) must have documentation of income (even if there is no income).
- One or more of the below documents must be kept in the client/household file.
- If there are more than one adult in a household, documentation must be provided for each adult household member.
- If an adult has more than one income source or job, each source of income should have its own documentation (i.e., paystubs for employment & TANF benefit letter).

Documentation Options by Income Types				
Income Source	Include in Income Calculation?	Third-Party Verification	Oral Verification	Self-Declaration
No Income Reported	Yes	Copy of Social Security Statement obtained through http://www.socialsecurity.gov/mystatement/ AND Signed Declaration of No Income	N/A	Client completes Self Declaration of No Income
Wages and Salary	Yes GROSS Pay (Not Net Pay)	Copy of Recent Paystubs OR Signed Letter from Employer (including gross pay amount, frequency, average hours, and contact information)	Staff contacts employer and completes Oral Verification of Income	Client completes Self Declaration of No Income
Self-Employment/ Business Income	Yes NET Income (Not Gross Pay)	Copy of most recent federal or state tax return showing net business income	N/A	Client completes Self Declaration of No Income
Interest and Dividend Income	Yes GROSS Pay (Not Net Pay)	Copy of most recent interest or dividend income statement OR Copy of most recent federal or state tax return showing interest, dividend, or other net income	N/A	Client completes Self Declaration of No Income
Pension/ Retirement Income	Yes GROSS Pay (Not Net Pay)	Copy of most recent payment statement or benefit notice from Social Security Administration (SSA), pension provider, or another source	Staff contacts provider and completes Oral Verification of Income	Client completes Self Declaration of No Income

Unemployment Income	Yes GROSS Pay (Not Net Pay)	Copy of most recent unemployment or severance payment statement notice	Staff contacts provider and completes Oral Verification of Income	Client completes Self Declaration of No Income
Disability Income	Yes GROSS Pay (Not Net Pay)	Copy of most recent worker's compensation, SSI, or SSDI payment	Staff contacts provider and completes Oral Verification of Income	Client completes Self Declaration of No Income
Temporary Assistance for Needy Families (TANF) or other Cash Public Assistance	Yes GROSS Pay (Not Net Pay)	Copy of most recent payment statement or benefit notice	Staff Contacts Provider and completes Oral Verification of Income	Client completes Self Declaration of No Income
Alimony, Child Support, Foster Payment	Yes GROSS Pay (Not Net Pay)	Copy of most recent alimony, foster care, child support or other contributions or gift payment statements, notices, or orders	Staff contacts provider, family member, or court, and completes Oral Verification of Income	Client completes Self Declaration of No Income
Armed Forces Income	Yes GROSS Pay (Not Net Pay)	Copy of payment statement or other government issued statement indicating income amount	Staff contacts provider and completes Oral Verification of Income	Client completes Self Declaration of No Income

The following table describes the types of income that are not counted when calculating gross income for purposes of determining ESG eligibility and documentation.

Income Exclusions by Income Types	
General Category	Description
1. Income of Children	Income from employment of children (including foster children) under the age of 18 years.
2. Inheritance and Insurance Income	Lump-sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains and settlement for personal or property losses (except as provided in Pension/Retirement Income).
3. Medical Expense Reimbursements	Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member.
4. Income of Live-in Aides	Income of a live-in aide (as defined in 24 CFR 5.403).
5. Disabled Persons (only in HOME Properties)	Certain increases in income of a disabled member of qualified families residing in HOME-assisted housing or receiving HOME tenant-based rental assistance (24 CFR 5.617).
6. Student Financial Aid	The full amount of student financial assistance paid directly to the student or to the educational institution.
7. Armed Forces Hostile Fire Pay	The special pay to a family member serving in the Armed Forces who is exposed to hostile fire.
8. Self-Sufficiency Program Income	a. Amounts received under training programs funded by HUD.
	b. Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS).
	c. Amounts received by a participant in other publicly assisted programs that are specifically for, or in reimbursement of, out-of-pocket expenses incurred (special equipment, clothing, transportation, childcare, etc.) and which are made solely to allow participation in a specific program.

	<p>d. Amounts received under a resident service stipend. A resident service stipend is a modest amount (not to exceed \$200 per month) received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to: fire patrol, hall monitoring, lawn maintenance, resident initiatives coordination, and serving as a member of the PHA's governing board. No resident may receive more than one such stipend during the same period of time.</p>
	<p>e. Incremental earnings and benefits received by any family member for participation in qualifying state or local employment training programs (including training not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives and are excluded only for the period during which the family member participates in the employment training program.</p>
9. Other Non-recurring Income	Temporary, nonrecurring, or sporadic income (including gifts). Sporadic wages or employment income should be included in the income calculation.
10. Reparations	Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era.
11. Income from Full-time Students	Annual earnings in excess of \$480 for each full-time student 18 years old or older (excluding the head of household or spouse).
12. Adoption Assistance	Adoption assistance payments in excess of \$480 annually per adopted child.
13. Deferred/Lump Sum Social Security & SSI Income	Deferred periodic amounts from SSI and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts.
14. Income Tax and Property Tax Refunds	Amounts received by the family in the form of refunds or rebates under state or local law for property taxes paid on the dwelling unit.
15. Home Care Assistance	Amounts paid by a state agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep this developmentally disabled family member at home.

16. Other Federal Exclusions

Amounts specifically excluded by any other federal statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under any program to which the exclusions of [24 CFR 5.609\(c\)](#) apply, including:

- The value of the allotment made under the Food Stamp Act of 1977;
- Payments received under the Domestic Volunteer Service Act of 1973 (employment through VISTA, Retired Senior Volunteer Program, Foster Grandparents Program, youthful offender incarceration alternatives, senior companions);
- Payments received under the Alaskan Native Claims Settlement Act;
- Income derived from the disposition of funds to the Grand River Band of Ottawa Indians;
- Income derived from certain submarginal land of the United States that is held in trust for certain Indian tribes;
- Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program;
- Payments received under the Maine Indian Claims Settlement Act of 1980 (25 U.S.C. 1721);
- The first \$2,000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the U.S. Claims Court and the interests of individual Indians in trust or restricted lands, including the first \$2,000 per year of income received by individual Indians from funds derived from interests held in such trust or restricted lands;
- Amounts of scholarships funded under Title IV of the Higher Education Act of 1965, including awards under the Federal work-study program or under the Bureau of Indian Affairs student assistance programs;
- Payments received from programs funded under Title V of the Older Americans Act of 1985 (Green Thumb, Senior Aides, Older American Community Service Employment Program);
- Payments received on or after January 1, 1989, from the Agent Orange Settlement Fund or any other fund established pursuant to the settlement in the In Re Agent Orange product liability litigation, M.D.L. No. 381 (E.D.N.Y.);
- Earned income tax credit refund payments received on or after January 1, 1991, including advanced earned income credit payments;
- The value of any child care provided or arranged (or any amount received as payment for such care or reimbursement for costs incurred for such care) under the Child Care and Development Block Grant Act of 1990;
- Payments received under programs funded in whole or in part under the Job Training Partnership Act (employment and training programs for Native Americans and migrant and seasonal farm workers, Job Corps, state job training programs and career intern programs, AmeriCorps);
- Payments by the Indian Claims Commission to the Confederated Tribes and Bands of Yakima Indian Nation or the Apache Tribe of Mescalero Reservation;
- Allowances, earnings, and payments to AmeriCorps participants under the National and Community Service Act of 1990;
- Any allowance paid under the provisions of 38 U.S.C. 1805 to a child suffering from spina bifida who is the child of a Vietnam veteran;
- Any amount of crime victim compensation (under the Victims of Crime Act) received through crime victim assistance (or payment or reimbursement of the cost of such assistance) as determined under the Victims of Crime Act because of the commission of a crime against the applicant under the Victims of Crime Act.

Documentation of Lack of Resources at Recertification

When providing Homelessness Prevention assistance, subrecipients must demonstrate that the program participant does not have sufficient resources or support networks (e.g., family, friends, faith-based, or other social networks) immediately available to prevent them from moving to an emergency shelter or an unsheltered destination. Acceptable documentation generally includes:

- Notice of termination from employment
- Unemployment compensation statement
- Bank statement
- Health-care bill showing arrears
- Utility bill showing arrears
- Other third-party documentation illustrating lack of resources
- Written statement by the relevant third party (e.g., former employer, public administrator, relative)
- Written statement of program staff of phone call or other verbal communication with relevant third-party source (if written documentation is unavailable)

Calculating Rental and Program Assistance Payments

Subrecipients are expected to adhere to the following rent payment and schedule guidance:

- Rapid Re-Housing providers should pay 100% the first month's rent regardless of household income.
- Beginning month two, the tenant pays 30% of their adjusted income until the termination of Rapid Re-Housing rental assistance.
-
- Tenants will pay their portion of the rental amount directly to the property owner.

Maximum Rental Assistance Allowed

Subsidy Layering

The City of Detroit will review subsidy layering within Rapid Re-Housing to ensure layered funding is in accordance with ESG standards. Approval from City of Detroit ESG contract manager is required in writing to provide RRH assistance to a household that already receives any other federal housing subsidy.

Leases and Rental Assistance Agreements

Each program participant receiving rental assistance through ESG must have a legally binding, written lease for the rental unit, unless the assistance is solely for rental arrears. The lease must be between the owner and the program participant. Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease if: 1) the agreement gives the program participant an enforceable leasehold interest under state law

and the agreement, and 2) rent owed is sufficiently documented by the owner's financial records, rent ledgers, or canceled checks.

In addition, a rental assistance agreement is required between the subrecipient and the landlord. A subrecipient may make rental assistance payments only to an owner with whom the subrecipient has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements listed in this section. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the subrecipient 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.

The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease. The landlord must agree to enter into the Rental Assistance Agreement every 90 days (upon client recertification).

The rental assistance agreement with the landlord must terminate and no further rental assistance payments under that agreement may be made if:

1. The program participant moves out of the housing unit for which the program participant has a lease.
2. The lease terminates and is not renewed.
3. The program participant becomes ineligible to receive ESG rental assistance.

The subrecipient must make timely payments to each owner in accordance with the lease and rental assistance agreement. The subrecipient is solely responsible for paying late payment penalties that it incurs with non-ESG funds.

Fair Market Rent and Rent Reasonableness Requirements

Rental assistance cannot be provided for a housing unit unless the total rent for the unit does not exceed the fair market rent (FMR) established by HUD, as provided under 24 CFR 982.503. The total rent for the unit must also comply with HUD's standard of rent reasonableness, as established under 24 CFR 982.507. These rent restrictions are intended to ensure that program participants can remain in their housing after their ESG assistance ends.

Rent reasonableness and FMR requirements do not apply when a program participant receives only financial assistance or services under Housing Stabilization and Relocation Services. This includes rental application fees, security deposits, an initial payment of last month's rent, utility payments/deposits, moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, legal services, and credit repair.

Note that this guidance only applies to the Homeless Prevention and Rapid Re-Housing components of ESG. For guidance on CoC rules regarding FMR and rent reasonableness, please consult the following [HUD Exchange resource](#).

For more information about calculating rent reasonableness and FMR, please review this [HUD Exchange Resource](#).

Rent Reasonableness

The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units.

In many areas, the easiest way to determine rent reasonableness is to use a housing database search engine that will compare units and rents against one another. Other local resources may also be used to obtain information, such as market surveys, classified ads, and information from real estate agents. When comparing rent reasonableness, the proposed unit must be compared to at least three other units.

Fair Market Rent (FMR)

FMRs are gross rent estimates. The U.S. Department of Housing and Urban Development (HUD) annually estimates FMRs for 530 metropolitan areas and 2,045 nonmetropolitan county areas. HUD sets FMRs to assure that a sufficient supply of rental housing is available to program participants. By law, HUD is required to publish new FMRs at the start of each federal fiscal year on October 1.

Fair Market Rents are updated by HUD every year and can be found online at: <http://www.huduser.org/portal/datasets/fmr.html>

Inspection Requirements

When available a Housing Inspector will inspect the unit. If a Housing Inspector is not available, a non-assigned case manager will complete the inspection.

HQS will be completed within 7 days of the unit becoming available for inspection ([HQS Inspection form](#)).

Subrecipients cannot use ESG funds to help a program participant remain in or move into housing that does not meet the minimum habitability standards under §576.403(c). This restriction applies to all activities under the Homelessness Prevention and Rapid Re-housing components.

Habitability inspections must be conducted by a qualified ESG recipient or subrecipient staff or contractor. Program participants may not conduct inspections.

In addition:

- If an eligible household needs homelessness prevention assistance to remain in its existing unit, the assistance can only be provided if that unit meets the minimum standards.
- If an eligible household needs homelessness prevention or Rapid Re-Housing assistance to move to a new unit, the assistance can only be provided if the new unit meets the minimum standards.
- Minimum standards must be met even if **one-time** assistance is provided (e.g., rental arrears, security deposit, etc.).
- The subrecipient must be sure to document compliance with the ESG habitability standards in the program participant's file.

ESG habitability standards cover 10 areas of review to ensure that the housing is minimally habitable. These 10 areas are:

- **Structure and materials** - The structures must be structurally sound to protect residents from the elements and not pose any threat to the health and safety of the residents.
- **Space and security** - Each resident must be provided adequate space and security for themselves and their belongings, and an acceptable place to sleep.
- **Interior air quality** - Each room or space must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.
- **Water supply** - The water supply must be free from contamination.
- **Sanitary facilities** - Residents must have access to sufficient sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.
- **Thermal environment** - The housing must have any necessary heating/cooling facilities in proper operating condition.
- **Illumination and electricity** - The structure must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the structure.
- **Food preparation** - All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.
- **Sanitary conditions** - The housing must be maintained in a sanitary condition.
- **Fire safety** - There must be a second means of exiting the building in the event of fire or other emergency. Each unit must include at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit. Smoke detectors must be located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is occupied by hearing impaired persons, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person. The public areas of all housing must be equipped with a sufficient number, but not less than one for each area, of battery-operated or hard-wired smoke detectors. Public areas include, but are not limited to,

laundry rooms, community rooms, day care centers, hallways, stairwells, and other common areas.

A checklist tool for ensuring that emergency shelter and permanent housing standards are met can be found here: <https://www.hudexchange.info/resources/documents/ESG-Emergency-Shelter-and-Permanent-Housing-Standards-Checklists.docx>

Lead-Based Requirements

If a building or unit was built before 1978, there is a possibility it has lead-based paint. In 1978 the federal government banned consumer uses of lead-containing paint, but some states banned it even earlier. Lead from paint, including lead-contaminated dust, is one of the most common causes of lead poisoning.

Organizations that receive funds for Homelessness Prevention **MUST** comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and they must implement regulations in [24 CFR part 35](#), subparts A, B, H, J, K, M, and R.

ESG regulations state that a lead-based paint visual assessment must be completed for all units that meet the three following conditions:

- The household living in the unit is being assisted with ESG financial assistance (rent assistance, utilities assistance, utility/security deposits, or arrears).
- The unit was constructed prior to 1978.
- A child under the age of six or a woman who could become pregnant is or may be living in the unit.

These regulations apply regardless of whether a household is staying in an existing unit or moving to a new unit and they must be complied with prior to providing ESG assistance. They must also be complied with (and assessments completed) annually thereafter.

ESG subrecipients are responsible for ensuring that property owners and managers meet the lead-based paint requirements. It may be helpful for subrecipients to think about the requirements in two categories, outlined below.

1. **Disclosure Requirements** - Disclosure requirements are triggered for ALL properties constructed prior to 1978. These requirements require that lessors (property owners or managers) provide tenants with:
 - [Disclosure form for rental properties disclosing the presence of known and unknown lead-based paint](#)
 - AND**
 - A copy of the [“Protect Your Family from Lead in the Home” pamphlet](#)

This requirement actually relates to property owners/managers but sharing this information with program participants (or ensuring they have received it) is an easy thing to do and is recommended for ESG subrecipients.

2. **The Visual Assessment** - Staff may become a HUD-Certified Visual Assessor by successfully completing a [20-minute online training](#) through HUD's website. Depending on the results of the visual assessment, additional steps may be required before assistance can be provided for that unit. The unit needs to be brought into compliance. There are certain exceptions to the rule. Visual assessments are not triggered under the following circumstances:
 - It is a zero-bedroom or SRO-sized unit.
 - X-ray or laboratory testing of all painted surfaces by certified personnel has been conducted in accordance with HUD regulations and the unit is officially certified to not contain lead-based paint.
 - The property has had all lead-based paint identified and removed in accordance with HUD regulations.
 - The client is receiving federal assistance from another program, where the unit has already undergone a visual assessment within the past 12 months (e.g., if the client has a Section 8 voucher and is receiving ESG assistance for a security deposit or arrears). NOTE: In such cases, ESG staff are required to obtain documentation that a visual assessment has been conducted by the agency administering the other assistance. This documentation should be added to the ESG case file.
 - It meets any of the other exemptions described in [24 CFR Part 35.115\(a\)](#).

If any of the conditions outlined above are met, a staff member simply needs to document the condition and place a copy in the participant's case file.

If a visual assessment reveals problems with paint surfaces, program staff cannot approve the unit for assistance until the deteriorating paint has been repaired. At this point, program staff must make a decision: 1) work with the property owner/manager to complete needed paint stabilization activities and clearance, 2) work with the household to locate a different (lead-safe) unit, or 3) refer the client to a different program if ESG assistance cannot be provided.

Termination from Rapid Re-Housing

To ensure effective communication for both Rapid Re-Housing agencies and program participants, the Detroit CoC requires the following prior to program termination:

- At least one face-to-face meeting with the Rapid Re-Housing participating household discussing program violations
- A written plan for rectifying program violations including action steps for both Rapid Re-Housing agency staff and program participants
- If termination is due to an inability to contact the client, the following must be documented in the file:
 - An attempted home visit, **and**

- A letter to the client and landlord notifying the intent to terminate rental assistance
- A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person who made or approved the termination decision (or a subordinate of that person)
- Prompt written notice of the final decision to the program participant

In any situation, case notes should demonstrate efforts made to contact and connect with the client.

Termination under this section does not bar the recipient or subrecipient from providing further assistance at a later date to the same family or individual as long as that individual has not reached the maximum amount of assistance (18 months of assistance over a three-year period). Those seeking further assistance must be homeless and referred through the CAM system, as outlined in *Section 3 > Coordinated Entry Systems* of this Policies and Procedures Manual.

CoC-funded Rapid Re-Housing programs should refer to [24 CFR § 578.91](#) for further guidance.

Section 11: HMIS

Summary

All projects funded with City of Detroit ESG and/or Detroit Continuum of Care funds, except those that are specifically for survivors of domestic violence, must participate in the Homeless Management Information System (HMIS). An HMIS is a locally managed database covering all HUD-funded homeless-serving programs within the ESG/Continuum of Care geography. Often other programs use HMIS as well. In Detroit, HMIS is administered by the Homeless Action Network of Detroit (HAND). Data from the HMIS is necessary to meet several federal reporting requirements, including the production of Annual Performance Reports for each program as well as system-wide reporting such as the Annual Homeless Assessment Report (AHAR), the bi-annual Point-in-Time count, and other reports. All programs are expected to abide by the Detroit CoC HMIS Policies and Procedures which are published on [HAND'S website](#).

For addition guidance on HMIS see the [HUD exchange](#) resource page.

Please note that domestic violence providers are exempted and prohibited from entering data into HMIS. Domestic violence providers must maintain a comparable database that collects similar information in order to provide aggregate data or reporting purposes. Additionally, some legal service providers may determine that entering client data into HMIS violates the attorney/client privilege of their clients. These providers may decide to use a comparable database for records to maintain attorney/client privilege.

Eligible HMIS Activities

ESG subrecipients may use ESG funds to pay for costs related to contributing data to the HMIS system. Subrecipients using these funds must fully comply with HUD's HMIS standards on participation, data collection, and reporting.

The subrecipients may use ESG funds to:

- Purchase or lease computer hardware
- Purchase software or software licenses
- Purchase or lease equipment, including telephones, fax machines, and furniture
- Obtain technical support
- Lease office space
- Pay charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS
- Pay salaries for HMIS operating activities, including:
 - Completing data entry
 - Monitoring and reviewing data quality
 - Completing data analysis

- Reporting to the HMIS Lead
- Training staff on use of the HMIS or a comparable database
- Implementing and complying with HMIS requirements
- Pay 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
- Pay staff travel costs to conduct intake
- Pay participation fees charged by the HMIS Lead, if the recipient or subrecipient is not the HMIS Lead

Section 12: Eligible Participation and Recordkeeping

Introduction to Determining Eligibility for ESG Programs

The following populations are eligible for ESG programs per HUD's homeless definition:

Category 1: Literally Homeless

An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

1. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings including a car, park, abandoned building, bus or train station, airport, or camping ground.
2. An individual or family living in a supervised publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, State, or local government programs for low-income individuals).
3. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Category 2: Imminent Risk of Homelessness

An individual or family who will imminently lose their primary nighttime residence, provided that:

1. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance
2. No subsequent residence has been identified
3. The individual or family lacks the resources or support networks, e.g., family, friends, faith-based, or other social networks, needed to obtain other permanent housing.

Category 3: Homeless Under Other Federal Statutes

Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

1. Are defined as homeless under other statutes
2. Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance
3. Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance
4. Can be expected to continue in such status for an extended period of time because of special needs or barriers

Category 4: Fleeing/Attempting to Flee Domestic Violence

Any individual or family who:

1. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
2. Has no other residence; and
3. Lacks the resources or support networks, e.g., family, friends, and faith-based or other social networks, to obtain other permanent housing. [24 CFR 578.3](#). Chronically Homeless McKinney-Vento Act.

Eligible populations vary by program type. See *Section 8 > Agency Recordkeeping and Reporting Requirements* for information about which categories are eligible for specific ESG components.

Introduction to Recordkeeping

ESG programs are required to keep both demographic (data elements required by HUD) and service records (e.g., case notes, case plans, bed lists, leases, etc.). Subrecipients are responsible for verifying and documenting the eligibility of all ESG clients prior to providing ESG shelter and/or assistance. This documentation must be maintained in the participant's case file.

Documentation of eligibility is required for all program participants, including those who are literally homeless. However, the absence of third-party documentation should not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or receiving services provided by a victim services provider.

In instances of individuals or families being admitted to emergency shelter, the City of Detroit expects to see certification by the individual or head of household as the primary method of establishing homeless eligibility. In these instances, the City of Detroit would consider a sign-

in sheet, with a certification that the individual or head of household seeking assistance is homeless typed at the top, as meeting this standard.

Written Standards Requirements for Subrecipients

Subrecipients must develop policies and procedures to ensure appropriate documentation is obtained and included in clients' files. In accordance with [24 CFR 576.401\(a\)](#), subrecipients must conduct an initial evaluation to determine 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 local CoC's written standards, including the processes for coordinated entry.

Detailed Documentation Options and Types

Specific information about documentation requirements for client files is provided in the sections below.

Intake/Discharge Forms

Subrecipients are required to collect basic demographic data on persons served with ESG funds. This data includes but is not limited to the information outlined in HUD's Homeless Management Information System (HMIS) Data Standards. Subrecipients can review the HMIS Data Standards online at <https://www.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual-2017.pdf>.

- Clients should be referred to ESG providers/services through Detroit CoC's coordinated entry system.
- Subrecipients should use the intake/discharge forms required by the Detroit CoC.
- CoC and ESG subrecipients are responsible for ensuring that required intake/discharge forms collect the information needed and are in compliance with HUD regulations/policies.
- Clients have the right to decline to answer any questions on an intake/discharge form or decline to have their data entered into HMIS and/or a comparable database.

The following charts summarize ESG HMIS data collection requirements. Subrecipients should reference the [HMIS Data Standards Manual](#) and [HMIS ESG Program Manual](#) for more information about HMIS requirements.

HUD Universal Data Elements (as of September 2017) <i>Required of All ESG Programs</i>	
3.1 Name	3.10 Project Start Date
3.2 Social Security Number	3.11 Project Exit Date
3.3 Date of Birth	3.12 Destination
3.4 Race	3.15 Relationship to Head of Household
3.5 Ethnicity	3.16 Client Location
3.6 Gender	3.20 Housing Move-in Date
3.7 Veteran Status	3.917 Living Situation
3.8 Disabling Condition	

Program Specific Data Elements (as of September 2017)						
#	Element	Street Outreach	Emergency Shelters and Services (Entry/Exits)	Emergency Shelters (Night by Night Shelters Only)	Homelessness Prevention	Rapid Re-Housing
4.2	Income and Sources	X	X	Optional	X	X
4.3	Non-Cash Benefits	X	X	Optional	X	X
4.4	Health Insurance	X	X	Optional	X	X
4.5	Physical Disability	X	X	X	X	X
4.6	Developmental Disability	X	X	X	X	X
4.7	Chronic Health Condition	X	X	X	X	X
4.8	HIV/AIDS	X	X	X	X	X
4.9	Mental Health Problem	X	X	X	X	X
4.10	Substance Abuse	X	X	X	X	X
4.11	Domestic Violence	X	X	X	X	X

4.12	Contact	X		X		
4.13	Date of Engagement	X		X		
4.14	Bed Night			X		
4.17	Housing Assessment Disposition	CA	CA	CA	CA	CA
W5	Housing Assessment at Exit				X	

X= Data collection is required

CA = Data collection is determined by how the CoC has structured the coordinated assessment in their area. Placement of the element would be required for any project that is conducting a coordinated assessment. This may be across multiple projects or sited in a central access point or coordinated intake center.

Case/Service Notes

Subrecipients must document the services provided to program participants using case notes.

Case notes must:

- Be legible and securely stored in the client file (either electronically in HMIS or in a paper file),
- Sufficiently detail the services provided, including the date, time, type of service, and staff member(s) assisting,
- Spell out the client’s housing plan (to leave or avoid shelter) and any goals they might have set for themselves, and
- Include any other relevant information.

See *Section 8 > Agency Recordkeeping and Reporting Requirements* for more information about documentation requirements.

HMIS/Comparable Database Release

In compliance with [24 CFR 576.400](#) (f), all data on all persons served under ESG must be entered into HMIS or a comparable database (if a subrecipient is a Domestic Violence services agency). If data is entered into an HMIS or comparable database where data is shared between providers (also known as an open system), there must be a signed consent to input information into the database. Subrecipients should use the Detroit CoC HMIS release form.

Section 13: Grant Administration

Agency Recordkeeping and Reporting Requirements

Subrecipients must implement appropriate recordkeeping and reporting procedures to document that ESG funds are used in accordance with the requirements. These records must allow the City of Detroit and HUD to determine whether ESG requirements are being met.

Subrecipients are required to keep records of the following:

- Coordinated entry system procedures, including written intake procedures developed by the Continuum of Care in accordance with the requirements established by HUD
- Rental assistance agreements and payments, including copies of all leases and rental assistance agreements for the provision of rental assistance, documentation of payments made to owners for the provision of rental assistance, and supporting documentation for these payments including dates of occupancy by program participants
- The monthly allowance for utilities (excluding telephone) used to determine compliance with the rent restriction
- Compliance with the shelter and housing standards in [24 CFR 576.403](#), including inspection reports
- Types of services provided under ESG, including rental assistance, housing stabilization, and relocation services, and the amounts spent on these services and assistance
- Compliance with the requirements of [24 CFR 576.400](#) for consulting with the Continuum of Care and coordinating and integrating ESG assistance with programs targeted toward homeless people and mainstream service and assistance programs
- Participation in HMIS or a comparable database
- Records of the source and use of contributions made to satisfy the matching requirement
- Compliance with organizational conflicts-of-interest requirements in [24 CFR 576.404\(a\)](#), a copy of the personal conflicts of interest policy or codes of conduct developed and implemented to comply with the requirements in [24 CFR 576.404\(b\)](#), and records supporting exceptions to the personal conflicts of interest
- Compliance with the homeless participation requirements under [24 CFR 576.405](#)
- Compliance with faith-based activities requirements under [25 CFR 576.407](#)
- Compliance with the nondiscrimination and equal opportunity requirements under [24 CFR 576.407\(a\)](#)
- Compliance with the uniform administrative requirements in [24 CFR part 84](#)
- Compliance with the environmental review requirements, including flood insurance requirements
- Certifications and disclosure forms required under the lobbying and disclosure requirements in [24 CFR part 87](#)
- Compliance with the displacement, relocation, and acquisition requirements in [24 CFR 576.408](#)

- Documentation of how ESG funds were spent on allowable costs in accordance with the requirements for eligible activities
- Receipt and use of program income
- Procurement contracts and documentation of compliance with the procurement requirements
- Written confidentiality procedures to ensure:
 - All personally identifying information of any individual or family who applies for and/or receives ESG assistance will be kept secure and confidential.
 - The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter.
 - The address or location of any housing of a program participant will not be made public, except as provided under a pre-existing privacy policy of the subrecipient and consistent with state and local laws regarding privacy and obligations of confidentiality.
- Program participant records that include the following:
 - Documentation of homeless or at risk of homelessness status
 - Compliance with regulations related to providing program services in accordance with program components and eligible activities, determining eligibility and amount and type of assistance, and using appropriate assistance and services (see [24 CFR 576.101](#), [24 CFR 576.106](#), [24 CFR 576.401](#)(a) and (b), and [24 CFR 576.401](#) (d) and (e)).
 - Initial consultation form and case notes
 - Intake and certification form
 - Follow-up case manager/client meetings and at least monthly case notes
 - Documented individualized housing and service plan, including a path to permanent housing stability
 - Documentation of financial assistance payment (must include the type of assistance, payee name, client name, check number, and amount paid using ESG funds)
 - Documentation of services and assistance provided to the program participant, including, as applicable, the security deposit, rental assistance, and utility payments made on behalf of the program participant
 - Determinations of ineligibility or termination of assistance (if applicable)
 - For each individual and family determined ineligible to receive ESG assistance, the client file must include documentation of the reason for that determination.
 - Documentation of termination of assistance must comply with the requirements in [24 CFR 576.402](#).
 - Documentation of the HMIS household number or a documented reason why the number is not available

Additional documentation requirements for each type of assistance provided and homelessness category are listed below.

Street Outreach: Category 1 Literally Homeless Clients

1. For applicants who lack a fixed, regular, and adequate nighttime residence, meaning nightly residence may be in: car; park; abandoned building; bus or train station; airport; camping ground; or hotel and motels paid for by charitable organizations or federal, state or local government programs. For these applicants, any of the following forms of documentation may be used:
 - Written observation by the outreach worker
 - Written referral by another housing or service provider
 - Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter
2. For an individual who is exiting an institution where he/she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution, any of the following forms of documentation may be used:
 - Written observation by the outreach worker
 - Written referral by another housing or service provider
 - Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter
 - and
 - Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution. All oral statements must be recorded by the intake worker, or
 - Written record of intake worker's due diligence in attempting to obtain the evidence described above and certification by the applicant that states he/she is exiting or has just exited an institution where he/she resided for 90 days or less.

Street Outreach: Category 4 Fleeing/Attempting to Flee Domestic Violence Clients

For Victim Service Providers:

1. An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

For Non-Victim Service Providers:

1. An oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the care worker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified.

2. Certification by the individual or head of household that no subsequent residence has been identified
3. Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Documenting Emergency Shelter Homeless Status

Eligibility for Emergency Shelter

- All persons served by Emergency Shelter Program services must meet either Category 1 or Category 4 of HUD's definitions of homelessness as defined in [24 CFR 577](#) at time of acceptance into an emergency shelter program. Refer to the glossary of terms in the beginning of this document for additional guidance on the definitions.
- There is no income limitation for entry into Emergency Shelter.
- While shelters may ask for identification for all members of the households, inability to produce this documentation is **NOT** a barrier for entry or reason for denial.

Documenting Homeless Status

Recipients and subrecipients operating emergency shelters can document homeless status through a certification by the individual or head of household as the primary method of establishing homeless eligibility. In these instances, one method of meeting this standard would be to require households to complete a sign-in sheet, with a statement at the top informing the individual or head of household that by signing, they certify that they are homeless. *Note: Under no circumstances must the lack of third-party documentation prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to receive shelter or services provided by a victim service provider.*

- Shelters **cannot** require the following documentation as a condition of admission: (list include but not limited to.)
 - Proof of citizenship
 - Marriage Certificates
 - Medical and Mental Health diagnosis and medication compliance
 - Vital documents such as ID, birth certificate, or social security cards

Emergency Shelter: Category 1 Literally Homeless Clients

1. For applicants who lack a fixed, regular, and adequate nighttime residence, meaning nightly residence may be in: car; park; abandoned building; bus or train station; airport; camping ground; or hotel and motels paid for by charitable organizations or federal, state or local government programs. For these applicants, any of the following forms of documentation may be used:
 - Written observation by the outreach worker
 - Written referral by another housing or service provider

- Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter
- 2. For an individual who is exiting an institution where he/she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution, any of the following forms of documentation may be used:
 - Written observation by the outreach worker
 - Written referral by another housing or service provider
 - Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter
 - and
 - Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution. All oral statements must be recorded by the intake worker, or
 - Written record of intake worker's due diligence in attempting to obtain the evidence described above and certification by the applicant that states he/she is exiting or has just exited an institution where he/she resided for 90 days or less.

Emergency Shelter: Category 4 Fleeing/Attempting to Flee Domestic Violence Clients

For Victim Service Providers:

1. An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

For Non-Victim Service Providers:

1. An oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the care worker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified.
2. Certification by the individual or head of household that no subsequent residence has been identified
3. Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Documenting Homeless Prevention

Homeless Prevention: Category 2 Imminent Risk of Homelessness Clients

1. Verification of at-risk of homelessness status, which may include:
 - A court order resulting from an eviction action notifying the individual or family that they must leave their residence within 14 days after the date of their application for homeless assistance; or the equivalent notice under applicable state law; or a Notice to Quit, or a Notice to Terminate issued under state law.
 - For individuals and families whose primary nighttime residence is a hotel or motel room not paid for by charitable organizations or federal, state, or local government programs for low-income individuals, evidence that the individual or family lacks the resources necessary to reside there for more than 14 days after the date of application for homeless assistance.
 - An oral statement by the individual or head of household that the owner or renter of the housing in which they currently reside will not allow them to stay for more than 14 days after the date of application for homeless assistance.
 - The intake worker must record the statement and certify that it was found credible. To be found credible, the oral statement must either:
 - Be verified by the owner or renter of the housing in which the individual or family resides at the time of application for homeless assistance and documented by a written certification by the owner or renter or by the intake worker's recording of the owner or renter's oral statement; or
 - Be documented by a written certification by the intake worker of his/her due diligence in attempting to obtain the owner or renter's verification and the written certification by the individual or head of household seeking assistance that his/her statement was true and complete.
2. Certification that and no subsequent residence has been identified
3. Self-certification or other written documentation that the individual lacks the financial resources and support necessary to reside there for more than 14 days after the date of application for homeless prevention

Homeless Prevention: Category 4 Fleeing/Attempting to Flee Domestic Violence Clients

For Victim Service Providers:

1. An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

For Non-Victim Service Providers:

1. An oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the care worker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified.
2. Certification by the individual or head of household that no subsequent residence has been identified
3. Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Homeless Prevention: Additional Limitations on Eligibility

Providers must only serve individuals and families that have an annual income below 30% of annual area median income (AMI).

Homeless Prevention: At Risk of Homelessness

Where the program participant qualified as at-risk of homelessness under paragraph (1) of the definition, the records should reflect that the household's income is below 30 percent of the area median income as evidenced by an income evaluation form containing HUD's minimum requirements and at least one of the following:

1. Source documents for the assets held by the program participant and source documents of the income received over the most recent period for which representative data is available before the date of intake.
Written statement by the relevant third party (e.g., employer) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party of the income of the program participant received over the most recent period for which representative data are available.
2. Written certification by the program participant of the amount of income the program participant received for the most recent period representative of the income that the program participant is reasonably expected to receive over the 3-month period following the evaluation.
3. Where the program participant qualified as at-risk of homelessness under paragraph (1) of the definition, do the records reflect the program participant's written certification that the program participant has insufficient financial resources and support networks immediately available to attain housing stability and meets one or more of the conditions under paragraph (1)(iii) of the "at risk of homelessness" definition?
4. Where the program participant qualified as at-risk of homelessness under paragraph (1) of the definition, do the records show reasonable efforts to verify that the program participant did not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the homeless definition, as evidenced by one of the following:

- a. Source documents (e.g., notice of termination from employment, bank statement, or health care bill showing arrears)
 - b. A written verification by the relevant third party or written certification by the recipient's/subrecipient's intake staff of the oral verification by the relevant third party; or
 - c. A written statement by the recipient's/subrecipient's intake staff of the efforts taken to obtain verification through source documents and relevant third parties
5. Where the program participant qualified as at-risk of homelessness under paragraph (1) of the definition, do the records show reasonable efforts to verify that the program participant met one of the seven conditions under paragraph (1)(iii), as evidenced by one of the following:
- a. Source documents that evidence one or more of the conditions.
 - b. A written statement by the relevant third party or the written certification by the recipient's/subrecipient's intake staff of the oral verification by the relevant third party that the applicant meets one or more of the conditions
 - c. A written statement by the recipient's or subrecipient's intake staff that the staff person has visited the applicant's residence and determined that the applicant meets one or more of the conditions. If a visit is not feasible or relevant to the determination, a written statement by the recipient's/subrecipient's staff describing the efforts taken to obtain the required evidence.
- NOTE:** The conditions are: (1) has moved because of economic reasons two or more times during the 60 days immediately preceding the application for assistance; (2) is living in the home of another because of economic hardship; (3) has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of the application for assistance; (4) lives in a hotel or motel and the cost is not paid by charitable organizations, federal, state, or local government programs for low-income individuals; (5) lives in an SRO or efficiency apartment in which there resides more than two persons, or lives in a larger housing unit in which there resides more than 1.5 persons per room, as defined by the U.S. Census Bureau; (6) is exiting a publicly-funded institution, or system of care, or (7) otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness as identified in the ESG recipient's Consolidated Plan.
6. Where the program participant qualified as at-risk of homelessness under paragraph (2), do the records reflect that the program participant met the definition of homeless under one of the following Federal statutes, as evidenced by a certification of the child's or youth's homeless status by the agency or organization responsible for administering assistance under the statute:
- d. Runaway and Homeless Youth Act
 - e. Head Start Act
 - f. Subtitle N of the Violence Against Women Act of 1994

- g. Section 330 of the Public Health Service Act
 - h. The Food and Nutrition Act of 2008
 - i. Section 17 of the Child Nutrition Act of 1966
7. Where the program participant qualified as at-risk of homelessness under paragraph (3), the records should reflect that the child or youth in the household qualified as homeless under subtitle B of title VII of the McKinney-Vento Homeless Assistance Act, as evidenced by certification of the child or youth's homeless status from an agency or organization that administers assistance under the Education for Homeless Children and Youth Program.
- NOTE:** Under this paragraph of At-Risk of Homelessness the certification need only specify that the child meets the definition under subtitle B of title VII of the McKinney-Vento Homeless Assistance Act.

Rapid Re-Housing: Category 1 Literally Homeless Clients

1. For applicants who lack a fixed, regular, and adequate nighttime residence, meaning nightly residence may be in: car; park; abandoned building; bus or train station; airport; camping ground; or hotel and motels paid for by charitable organizations or federal, state or local government programs. For these applicants, any of the following forms of documentation may be used:
 - Written observation by the outreach worker
 - Written referral by another housing or service provider
 - Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter
2. For an individual who is exiting an institution where he/she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution, any of the following forms of documentation may be used:
 - Written observation by the outreach worker
 - Written referral by another housing or service provider
 - Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter

and

 - Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution. All oral statements must be recorded by the intake worker, or
 - Written record of intake worker's due diligence in attempting to obtain the evidence described above and certification by the applicant that states he/she is exiting or has just exited an institution where he/she resided for 90 days or less.

Rapid Re-Housing: Category 4 Fleeing/Attempting to Flee DV

For Victim Service Providers:

3. An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

For Non-Victim Service Providers:

1. An oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the care worker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and
2. Certification by the individual or head of household that no subsequent residence has been identified; and
3. Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing. Documentation of compliance with the applicable requirements for providing service and assistance ([24 CFR 576.104](#)) includes:
 - Monthly case manager meeting case notes
 - Documented individualized plan to help retain permanent housing after the ESG assistance ends
 - Verification of income - not required for Rapid Re-Housing until recertification at the one-year mark

Period of Record Retention

Records related to each fiscal year of ESG funds must be retained for the greater of five years or the period specified below:

- Documentation of each program participant's qualification as a family or individual at risk of homelessness or as a homeless family or individual as well as other program participant records must be retained for 5 years **after** the expenditure of all funds from the grant under which the program participant was served.
- Where the ESG funds that are used for the renovation of an emergency shelter exceed 75 percent of the value of the building before renovation, records must be retained until 10 years after the date that ESG funds are first obligated for the renovation.
- Where the ESG funds that are used to convert a building into an emergency shelter exceed 75 percent of the value of the building after conversion, records must be retained until 10 years after the date that ESG funds are first obligated for the conversion.

Access to Records

Subrecipients must comply with the requirements for access to records which establish that HUD, the HUD Office of the Inspector General, and the Comptroller General of the United

States, or any of their authorized representatives, and the City of Detroit, must have the right of access to all documents, papers, or other records kept by the subrecipient relevant to the ESG award. This also includes access to subrecipients' staff for the purpose of interview and discussion of documents. These rights last as long as the records are retained.

Conflict of Interest

For the procurement of goods and services, subrecipients must comply with the codes of conduct and conflict of interest requirements under [2 CFR 200.112](#) . For all other activities, the ESG Interim Rule establishes that any employee, agent, consultant, officer, or elected or appointed official of the subrecipient who has functions or responsibilities related to the ESG program and its activities or who is in a position to participate in a decision-making process or gain inside information about the program, may not:

- Obtain a financial interest or benefit from an ESG-assisted activity
- Have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity
- Have a financial interest in the proceeds derived from an ESG-assisted activity, either for themselves or those with whom they have family or business ties

This applies during the person's tenure with the program and for the one-year period following their tenure.

In addition, a subrecipient may not condition any type or amount of ESG assistance on an individual's or family's acceptance or occupancy of emergency shelter or housing owned by the City of Detroit, the subrecipient, or a parent or subsidiary of the subrecipient. For individuals or families occupying housing that is owned by the subrecipient (or a parent or subsidiary of the subrecipient), the subrecipient may not complete the initial evaluation required under [24 CFR 576.401](#) (i.e., the evaluation of program participant eligibility and needs) or administer homelessness prevention assistance.

Exceptions

Subrecipients may submit a written request for an exception to the conflicts of interest provisions. This request should be submitted to the City of Detroit, which will then submit the request to HUD. HUD will only consider the exception request if all of the following documentation is submitted:

- A 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
- An opinion of the subrecipient's and City of Detroit's attorneys that the interest for which the exception is sought would not violate state or local law.

Please see [24 CFR 576.404](#) for more information.

Non-Discrimination, Equal Opportunity, and Affirmative Outreach

Subrecipients are required to ensure that ESG-funded services are made available to all on a nondiscriminatory basis, and to publicize this fact. This availability must reach persons of any particular race, color, religion, sex, age, familial status, national origin, or disability within the agency's service area. If it is unlikely that the procedures that the subrecipient intends to use to make known the availability services will reach persons of any particular race, color, religion, sex, age, familial status, national origin, or disability who may qualify for those facilities and services, the subrecipient must establish additional procedures that ensure that those persons are made aware of the services. Subrecipients must take appropriate steps to ensure effective communication with persons with disabilities including, but not limited to adopting procedures that will make available to interested persons information concerning the location of assistance, services, and facilities that are accessible to persons with disabilities. Consistent with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, subrecipients are also required to take reasonable steps to ensure meaningful access to programs and activities for limited English proficiency (LEP) persons.

Uniform Administrative Requirements

The requirements of 24 CFR Part 84, except 24 CFR 84.23 (i.e., cost sharing or matching) and 24 CFR 84.53 (i.e., property standards) do not apply, and program income is to be used as the nonfederal share under 24 CFR 84.24(b). These regulations include allowable costs and non-federal audit requirements. See [24 CFR Part 84](#) for more information.

Environmental Review Responsibilities

ESG activities are subject to environmental review by HUD under [24 CFR Part 50](#). The City of Detroit is responsible for supplying all available, relevant information necessary for HUD to perform for each property any environmental review required by [24 CFR Part 50](#). The City of Detroit is also required to carry out mitigating measures required by HUD or select an alternate eligible property. HUD may eliminate from consideration any application that would require an Environmental Impact Statement (EIS).

The City of Detroit and ESG subrecipients, including any contractors of subrecipients, may not acquire, rehabilitate, convert, lease, repair, dispose of, demolish, or construct property for an ESG project, or commit or expend HUD or local funds for eligible ESG activities, until HUD has performed an environmental review under [24 CFR Part 50](#). The City of Detroit must have received HUD approval of the property prior to any ESG activities beginning.

The City of Detroit's application for an environmental review is in Appendix G.

Davis-Bacon Act

The Davis-Bacon Act (40 U.S.C. 276a to 276a-5) does not apply to the ESG program.

Procurement of Recovered Materials

The City of Detroit and its contractors must comply with Section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. The requirements of Section 6002 include procuring only items designated in guidelines of the Environmental Protection Agency (EPA) at [40 CFR part 247](#) that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the items exceeds \$10,000 or the value of the quantity acquired by the preceding fiscal year exceeded \$10,000; procuring solid waste management services in a manner that maximizes energy and resource recovery; and establishing an affirmative procurement program for procurement of recovered materials identified in the EPA guidelines.

Section 504 of the Rehabilitation Act of 1973

Subrecipients must comply with Section 504 of the Rehabilitation Act of 1973 (The Act). Pursuant to the requirement of The Act, subrecipients must ensure that no otherwise qualified disabled person shall, solely by reason of their disability, be excluded from the participation in, be denied the benefits of, or be subject to discrimination (including discrimination in employment) in, any program or activity that receives or benefits from Federal financial assistance. The subrecipient must also ensure that requirements of The Act shall be included in the agreements with and be binding on all of its subrecipients, contractors, subcontractors, assignees, or successors.

Faith-Based Activities

Organizations that are religious or faith-based are eligible, on the same basis as any other organization, to receive ESG funds. Neither the federal government nor a state or local government receiving funds under ESG shall discriminate against an organization based on the organization's religious character or affiliation.

Faith-based organizations are eligible to receive ESG funds per [24 CFR 576.406](#) under the following conditions:

1. Organizations that are directly funded under the ESG program may not engage 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.

2. Any religious organization that receives ESG funds retains its independence from federal, state, and local governments, and may continue to carry out its mission, including the definition, practice, and expression of its religious beliefs, provided that the religious organization does not use direct ESG funds to support any inherently religious activities (such as worship, religious instruction, or proselytization). Among other things, faith-based organizations may use space in their facilities to provide ESG-funded services, without removing religious art, icons, scriptures, or other religious symbols. In addition, an ESG-funded religious organization retains its authority over its internal governance and the organization may retain religious terms in its organization's name, select its board members on a religious basis, and include religious references in its organization's mission statements and other governing documents.
3. An organization that receives ESG funds shall not, in providing ESG assistance, discriminate against a program participant or prospective program participant based on their religion or religious beliefs.
4. ESG funds may not be used for the rehabilitation of structures to the extent that those structures are used for inherently religious activities. ESG funds may be used for the rehabilitation of structures only to the extent that those structures are used for conducting eligible activities under the ESG program. Where a structure is used for both eligible and inherently religious activities, ESG funds may not exceed the cost of those portions of the rehabilitation that are attributable to eligible activities in accordance with the cost accounting requirements applicable to ESG funds. Sanctuaries, chapels, or other rooms that an ESG-funded religious congregation uses as its principal place of worship, however, are ineligible for funded improvements under the program. Disposition of real property after the term of the grant, or any change in use of the property during the term of the grant, is subject to government-wide regulations governing real property disposition (see [2 CFR 200](#)).
5. If the recipient or a subrecipient that is a local government voluntarily contributes its own funds to supplement federally-funded activities, the subrecipient has the option to segregate the federal funds or commingle them. However, if the funds are commingled, this section applies to all of the commingled funds.

Lobbying Requirements

Subrecipients must include Lobbying Policies in their program policies and procedures that summarize the community or subrecipient's policy on employee contacting or communicating with a federal agency, member of congress, or congressional staff member as an advocate for funding of any program.

Financial Management and Procurement Requirements

Subrecipients must comply with applicable requirements outlined in [2 CFR 200](#) and based on their grant award year and contract.

Section 14: Program Monitoring

Summary

The City of Detroit has a duty to ensure that all ESG funds are spent in a timely, correct fashion according to the federal and state regulations that guide the ESG program. Monitoring has proven an effective tool for improving subrecipient performance, establishing community best practices, and avoiding problems and challenges that subrecipients may encounter.

Subrecipients will be monitored by the City of Detroit on a regular basis. They may also be monitored by HUD, either as a part of the recipient, the City of Detroit, being monitored, or they may be directly monitored by HUD.

The City of Detroit seeks to ensure that monitoring is as positive of an experience as it can be. The overall goal is to improve the provision of service for people who experience homelessness, within the constraints of the regulations. The City of Detroit undertakes not to use the monitoring compliance process in a punitive, negative way.

Monitoring Process

Each year, the City of Detroit will draft a plan to determine which agencies and programs will be monitored. This determination is based on determined financial and programmatic risk. If an agency or program is among those the City of Detroit determined to be monitored, the City of Detroit will reach out and inform that agency at least three weeks before they begin the monitoring process. (In rare circumstances, such as responding to a serious complaint, the City of Detroit reserves the right to monitor with no notice.) The City of Detroit Housing and Revitalization Department conducts all programmatic monitoring. Based on the City of Detroit HRD's established policies for homeless programs, programmatic monitoring will occur on site at least bi-annually. The determination of frequency is based on assessed risk. Financial monitoring by the City of Detroit Office of the Controller.

On-Site Monitoring

On-site monitoring involves staff from the City of Detroit working on-site at the agency or project. The monitoring will usually involve some or all of the following activities:

- Interviews with staff and residents that either work at or use the project
- A review of financial and project materials related to the project
- A physical inspection of the project

On-site monitoring can take anywhere from half a day to several days, depending on the activities reviewed and the size of the project.

If the City of Detroit monitors on-site, City staff will need access to a quiet space (such as a table and chair) where they can work and review materials, as well as a confidential space where they can speak to managers, staff, and clients.

Remote Monitoring

Remote monitoring can take place at any time during the year. The City of Detroit reserves the right to request materials that include but are not limited to: client files, program resources, policies and procedures, and financial back up materials.

If the City of Detroit requests that the program or agency submits materials to be reviewed remotely, the agency will need to submit the information to the City of Detroit electronically. It is the agency's responsibility to submit data in a secure, encrypted way or to agree with the City of Detroit on a mutually acceptable way to transmit the data that redacts all personal identifiable information.

The Monitoring Visit

The City of Detroit will communicate with an agency at least 3 weeks in advance to give them time to make preparation for the visit. The agency has the right to request a different date, if the agency or program has another significant event at that time. The City of Detroit will follow up with an email outlining the monitoring schedule, the activities to be reviewed, and the names of the City staff who will be conducting the monitoring visit.

The City of Detroit may request information from a program or agency in advance of the visit as part of its preparation. This will help staff to have a fuller understanding of the goals and objectives of the program.

Entrance Conference

At the beginning of the monitoring visit, the City of Detroit staff will conduct an entrance conference with agency and program managers and staff. The purpose of this meeting will be to communicate the objectives, scope, and focus of the monitoring visit. During this meeting City of Detroit staff will:

- Explain how the monitoring visit will be conducted
- Establish key points of contact within the agency that can assist during the monitoring
- Confirm activities that will be reviewed and make arrangements for files and materials to be made available
- Identify key staff and clients to be interviewed
- Schedule a physical inspection of the building (as needed)

During the Visit

The City of Detroit staff will spend the monitoring visit carrying out the activities listed above. They will evaluate the data that an agency provides and draw conclusions. The conclusions will be supported by documentation, particularly if these conclusions become findings or concerns.

During the visit, the City of Detroit reserves the right to request additional files, materials, or people to be interviewed.

Exit Conference

At the end of the visit, City of Detroit staff will meet with the agency to provide a short, verbal summary of the conclusions that they have drawn.

An agency will have the opportunity to comment on any problem areas that City of Detroit staff found during the visit, so that program staff have the opportunity to correct perceived deficiencies or noncompliance at the time of the visit.

After the Monitoring Visit

Within 30 days, the City of Detroit will send a letter summarizing the monitoring activities and any conclusions that may have been drawn from these.

This will include one or more of the following:

- That there were areas of concern (deficiencies in performance that are not based on a regulatory or statutory requirement, but nevertheless should be brought to the attention of the agency)
- That there were findings (deficiencies that are not in compliance with regulatory or statutory requirements)
- That there were no areas of concern or findings noted during the monitoring visit

If the letter outlines a finding, it will also include a summary of the reason that the City of Detroit has classified the issue as a finding, and how the agency or program can correct the finding. The City of Detroit will also establish a timeframe on when the corrective action should be completed by.

It is important to remember that until the agency can conclusively show that each finding has been corrected, and that the City of Detroit has acknowledged this in writing, that each finding will remain open. This may have implications for future application for ESG funding.

Appendices Index

Rapid Rehousing Forms can be found [here](#).

Appendix A-Reimbursement Checklist and Supporting Documents

Appendix B-ESG Match Documentation Form

Appendix C-Shelter Residents' Rights

Appendix D-Self-Statement of Homelessness

Appendix E-Missing Documentation Form

Appendix F-HQS Inspection Form

Appendix G-Environmental Review Form

Appendix H: Housing Plan

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Detroit Homeless System Written Standards

Introduction:

This document is an outline of the programs that comprise Detroit’s Homeless System. The purpose of this document is to establish policies and procedures for evaluating eligibility for program types, prioritization guidelines for persons entering into a homeless assistance program, duration of assistance, and to determine the minimum or maximum contribution of households receiving rental assistance. This document also includes overarching *Essential Elements* that apply to all programs within the system either current or in the future.

Definitions:

Chronically Homeless: To be considered chronically homeless, an individual or head of household must meet the definition of “homeless individual with a disability” from the McKinney-Vento Act, as amended by the HEARTH Act and have been living in a place not meant for human habitation, in an emergency shelter, or in a safe haven for the last 12 months continuously or on at least four occasions in the last three years where those occasions cumulatively total at least 12 months.¹ An in-depth definition is available in the [Final Rule](#) “Chronically Homeless.”

Contact: A contact is defined as an interaction between a worker and a participant. Contacts may range from simple a verbal conversation between the street outreach worker and the participant about the participant’s well-being or needs or may be a referral to service.

Continuum of Care (CoC): The group organized to carry out homelessness planning for a community under the HEARTH Act. Responsibilities of the CoC include the operation of the CoC; designating and operating an HMIS; and Continuum of Care planning.

Coordinated Assessment Model (CAM): CAM serves as Detroit’s coordinated entry process that serves persons at risk for or experiencing homelessness in Detroit. The process includes standardized structures and protocols that streamline screening, assessment and referral processes for those experiencing homelessness.

Documented Offer of Permanent Housing: A documented offer of a permanent housing intervention is where the subsidy or rental assistance is immediately available at the time the offer is made, i.e. a person can immediately be issued a voucher or subsidy and begin the housing search process. The documented offer should include the following information:

- Type of permanent housing intervention
- Date of offer
- Participants’ response to the offer (accept or decline)

Engagement: Engagement is defined as the date on which an interactive participant relationship results in a deliberate participant assessment or beginning of a case plan.

¹ U.S. Department of Housing and Urban Development. April 2016. [CoC FAQ](#).

Enrollment: The point at which a client has formally consented to participate in services.

Homeless: The HEARTH definition of “homeless” consists of four categories. The categories are: (1) Individuals and families who lack a fixed, regular, and adequate nighttime residence and includes a subset for an individual who resided in an emergency shelter or a place not meant for human habitation and who is exiting an institution where he or she temporarily resided; (2) individuals and families who will imminently lose their primary nighttime residence; (3) unaccompanied youth and families with children and youth who are defined as homeless under other federal statutes who do not otherwise qualify as homeless under this definition; and (4) individuals and families who are fleeing, or are attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member.² A more in-depth definition is available within the HEARTH “Homeless” [Final Rule](#).

Homeless Management Information System (HMIS): A database that allows agencies within the homeless system to collect basic demographic information, track services, update case plans, and track outcomes at the project and participant level.

Housing Case Management: Housing Case Management is a collaborative process that assesses, plans, implements, coordinates, monitors, and evaluates the options and services required to meet the client's housing and human service needs. It is characterized by advocacy, communication, and resource management and promotes quality and cost-effective interventions and outcomes. The case management services are comprehensive in nature to ensure a more effective service delivery but are tailored to the varying needs of the individual &/or family.

The process includes identifying the individual & /or family's strengths and goals determined in the Individualized Housing Assistance Plan (IHAP) developed before/ & or during housing navigation. The case manager &/or Housing Navigator works with the individual &/or family to achieve short- and long-term goals, helping them access the necessary services. Although locating and obtaining housing is usually the primary goal, this cooperative relationship addresses the following:

- Provide housing stabilization services that include arranging, coordinating, linking and monitoring the delivery of services that assist participants to obtain and sustain housing stability
- Monitoring program participant progress
- Assuring that the rights of participants are protected
- Development of individualized housing plans for each program participant
- Counseling, education, employment, and life skills goals

Housing First: Housing First is an approach to homeless assistance that prioritizes rapid placement and stabilization in permanent housing and does not have service participation requirements or preconditions such as sobriety or a minimum income threshold. Projects using a housing first approach often have supportive services; however, participation in those services is based on the needs and desires of the program participant. The Detroit CoC should review system- and project-level eligibility criteria to identify and remove barriers to accessing services and housing that are experienced by homeless individuals and families.³

² U.S. Department of Housing and Urban Development. December 2011. [HEARTH “Homeless” Final Rule](#).

³ U.S. Department of Housing and Urban Development, Office of Community Planning and Development. September 17, 2015. [Notice of Funding Availability for the Continuum of Care \(CoC\) program. Pg. 10 – 11.](#)

Navigation: Housing Navigators will serve as the main point of contact for homeless households determined to be eligible for Permanent Supportive Housing, per outcome score on the Full SPDAT assessment. The Coordinated Assessment Model (CAM) Navigator’s primary responsibility is to provide case management services, at the level and intensity required to ensure the household is “housing ready.” *Housing Navigation* should include the following activities:

- Provide the CAM Lead (Intake Team) with Navigation appointment time slots. The CAM External Intake team will schedule appointments for consumers assessed in shelter that score PSH on the Full SPDAT in designated appointment slots. (CHS Only)
- Assess consumers referred to Navigation for PSH eligibility (i.e., presence of HUD approved disability). A Housing Choice Voucher (HCV) pre-application, and CAM HMIS referral should be completed for consumers with no verified disability
- Develop a client-centered Individualized Housing Assistance Plan to address/remove PSH eligibility barriers. The IHAP should be completed in person, and at the initial Navigation meeting with consumer and monitored bi-weekly
- Provide community resources/referrals to address barriers identified in the IHAP, and provide direct assistance with helping the household access these resources and benefits (i.e., mainstream and entitlement benefits, linking/coordinating mental health services, follow-up with primary care physician, legal services, etc.)
- Provide in-person housing case management and supports coordination to assist households in obtaining all necessary basic eligibility documentation required for housing
- Explain PSH CoC Prioritization, as stated in Policy & Procedures
- Provide consumer with bi-weekly PSH Match status updates following the bi-weekly PSH Match meetings
- Ensure consumer’s Verification of Homelessness documentation is within 30 days, prior to PSH Match
- Provide any necessary support to PSH provider/consumer, post PSH Match, to facilitate a successful housing placement
- Complete required documentation in HMIS

SPDAT and VI-SPDAT: The SPDAT is an evidence-informed approach to assessing an individual’s or family’s acuity. The tool, across multiple components, prioritizes who to serve next and why, while concurrently identifying the areas in the person/family’s life where support is most likely necessary in order to avoid housing instability. While the SPDAT is an assessment tool, the VI-SPDAT is a survey to help prioritize participants.⁴

Federal Regulations:

All projects must comply with the [Fair Housing Act](#) (including [Equal Access and Family Separation](#)), the [Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity](#) regulations, and the [Americans with Disabilities Act](#) regulations.

Overall Essential Elements:

All programs within the Detroit Homeless System, current or future, will adhere to the following *Essential Elements*:

- All programs will participate in HMIS (participation is defined in the [HMIS Policies and Procedures](#))

⁴ OrgCode Consulting, Inc.
Version 1

- All programs will participate in CAM and adhere to its policies and procedures (participation is defined in the [CAM Policies and Procedures](#))
- All agencies operating programs will be, at a minimum, a non-voting member of the Continuum of Care ([Continuum of Care Governance Charter](#))
- All programs will utilize a Housing First approach
- All programs will utilize all CoC-standardized forms and other types of documentation in order to facilitate agencies' ability to successfully comply with HUD requirements. The number of these forms and other types of documentation will remain as minimal as possible
- All programs will operate within a philosophy of providing Client/Participant Choice
- All programs abide by and adopt HUD/CoC Policies related to: ADA, Fair Housing, Equal Access & Family Separation, Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity
- All programs agree to abide by and consistently apply these Written Standards

Program Policies

The Detroit Continuum of Care will establish and approve policies on:

- Avoiding family separation (for family shelter) regardless of head of household age
- Program entry criteria
- Program discharge
- Accessibility accommodations (shelters should have some capacity to serve participants that need accessibility accommodations, including serving transgender persons in single sex shelters and individuals with a disability)

Engagement Programs/Services:

Engagement Programs/Services are those services provided to participants before they reach the front door of the homeless services system (the front door being the shelter system). This may include services to both those already homeless as well as to those at imminent risk of losing their housing.

OUTREACH:

Program Description	Essential Program Elements	Time Frame	Population	Measurement
Low barrier/Low demand street outreach or engagement that provides basic needs assistance and linkage to permanent housing.	<ul style="list-style-type: none"> • Develop trust to engage hard to reach homeless • Have dedicated staff to complete VI-SPDATs with all outreach participants, then to complete full SPDATs with anyone scoring on the VI-SPDAT for Permanent Housing • Provides contact, engagement and enrollment services as defined by these standards • Provide navigation services to link those served with housing • Provide access to basic needs including identification; health care services, etc. • Coordination with other outreach teams to avoid duplication of services and optimize coverage • Engage in efforts to determine participants' eligibility • Hours of Operation include business and non-business hours 	None	<p>Individuals and families experiencing homelessness who are not linked to other services.</p> <p>Service preference should be given to the unsheltered.</p>	<ul style="list-style-type: none"> • % of participants enrolled in the program will meet the definition of unsheltered • VI-SPDAT are completed on % of enrolled participants • % of all enrolled participants develop a housing goal • % of those who develop a housing goal exit homelessness to permanent housing • % retaining housing at one month and two year intervals • The extent to which persons who exit homelessness to Permanent Housing destinations return to homelessness within 6 and 24 months • Increase in placements to permanent housing destinations, temporary destinations (except for a place not meant for human habitation), and some institutional destinations

PREVENTION:

	Program Description	Essential Program Elements	Time Frame	Population	Measurement
Services Only	<p>Stabilization services to prevent shelter entrance and promote housing retention.</p> <p>Expanded coordination of legal services programs to cover more tenants facing eviction and more cooperation from the City & Court to allow for on-site counseling.</p>	<ul style="list-style-type: none"> • Have dedicated staff to complete an individualized assessment that assesses household needs, financial needs (including job training and placement), and eligibility for mainstream resources • Creates a housing stabilization plan with project participants • Provides needed housing stabilization services • Provides linkages to mainstream resources based on eligibility and need • Coordinates with DHHS and organizations daily for diversion program • Services include: mediation, legal services and utility financial assistance, relocation assistance 	<p>Services for up to 18 months for legal and mediation</p> <p>Utility and Relocation assistance once every 12 months</p>	<p>Those at imminent risk of being homeless (exact documentation needed to determine eligibility is based on programs' funding sources)</p>	<ul style="list-style-type: none"> • % of household that receive assistance will not become literally homeless within 6 months • % of household that receive assistance will not become literally homeless within 12 months • % of household that receive assistance will not become literally homeless within 2 years • Reduce the number of bailiff evictions by providing greater opportunities for legal representation in court, and expansion of eviction diversion program. Set a specific numeric goal once 36th District Court data is obtained, for baseline. • Expand the 36th District Court Eviction Diversion program to more than one management company. Better coordination and support for relocation before eviction.

	Program Description	Essential Program Elements	Time Frame	Population	Measurement
Financial Assistance and Services	<p>Short to medium term financial assistance and stabilization services to prevent shelter entrance and promote housing retention.</p> <p>Expanded coordination of legal services programs to cover more tenants facing eviction and more cooperation from the City & Court to allow for on-site counseling.</p>	<ul style="list-style-type: none"> • Have dedicated staff to complete an individualized assessment that assesses household needs, financial needs (including job training and placement), and eligibility for mainstream resources • Provides housing stabilization plan • Provides needed housing stabilization services including both financial and supportive services • Provides linkages to mainstream resources based on eligibility and need • Coordinates with DHHS and organizations daily for diversion program. • Services include: mediation, legal services, relocation assistance and utility financial assistance • Financial Assistance includes: 6 months of rental and/or utility arrears; 1-time security deposit and/or utility deposit; 12 months of rental assistance 	<p>Financial assistance up to 18 months based on need and one-time assistance for security and/or utility deposit if needed (need for these services determined by case managers utilizing a risk matrix).</p>	<p>Those at imminent risk of being homeless as defined in the Risk Matrix. Financial Assistance is prioritized through the scoring framework of the Risk Matrix.</p>	<ul style="list-style-type: none"> • % of household that receive assistance will not become literally homeless within 6 months. • % of household that receive assistance will not become literally homeless within 12 months. • % of household that receive assistance will not become literally homeless within 2 years. • Reduce the number of bailiff evictions by providing greater opportunities for legal representation in court, and expansion of eviction diversion program. Set a specific numeric goal once 36th District Court data is obtained, for baseline. • Expand the 36th District Court Eviction Diversion program to more than one management company. Better coordination and support for relocation before eviction.

DIVERSION:

Program Description	Essential Program Elements	Time Frame	Population	Measurement
<p>A program that diverts homeless families from entering shelter by helping them to identify immediate alternate housing arrangements and connecting them with services and financial assistance, if necessary.</p>	<ul style="list-style-type: none"> • Completes housing barrier needs assessment • Creates a housing stabilization plan with the participant • Provides conflict mediation • Provides housing location services • Provides housing stabilization services • Provides linkages to mainstream resources • Provides flexible financial assistance to maintain or obtain housing (car repairs, food cards, bus tickets, etc.). 	<p>Financial assistance in a 12 month period not to exceed \$1000</p>	<p>Homeless or “at-risk” families presenting for shelter</p>	<ul style="list-style-type: none"> • % of households that receive assistance will not enter into the homeless system • % of household that receive assistance will not become literally homeless within 6 months • % of household that receive assistance will not become literally homeless within 12 months • % of household that receive assistance will not become literally homeless within 2 years

Temporary Housing:

Time-limited temporary housing where individuals experiencing homelessness may stay and receive supportive services that are designed to enable individuals to move into permanent housing.

EMERGENCY SHELTER:

	Program Description	Essential Program Elements	Time Frame	Population	Measurement
Site-Based Emergency Shelter	<p>Low barrier, site based, temporary shelter to deal with an individual's or family's immediate housing crisis.</p> <p>The project must meet the following guidelines:</p> <ul style="list-style-type: none"> the primary intent of the project is to serve homeless persons, the project verifies homeless status as part of its eligibility determination, and the actual project participants are predominantly homeless 	<ul style="list-style-type: none"> Low programmatic barriers to entry and shelter stay Operates 24 hours a day / 7 days a week Accessed through CAM during CAM Business Hours; accessed directly via the shelter provider during non-CAM business hours Sobriety is not a condition for entry Identification is not a condition for entry Safe physical environment Completes VI-SPDATs (as noted in the CAM Policies and Procedures) Creates a housing stabilization plan with the participant Provides housing case management Provides at least one meal per day per participant Provides linkages to mainstream resources and services, including TANF, SNAP, SSI/SSDI, Medicaid/ Medicare, Children's Protective Services (CPS) etc. (case managers expected to help participants apply for benefits and navigate systems as needed). Cooperatively works with service providers within the system to provide needed services to consumers to quickly move them to permanent housing 	Average length of stay under 90 days	All literally homeless who meet Categories 1, 2, or 4 of HUD's definition of homeless	<ul style="list-style-type: none"> % of those served will receive a VI/SPDAT Of those who stay in shelter more than 14 days, % will establish a housing goal % will exit shelter to a permanent housing destination. This percentage should increase each year. The extent to which persons who exit homelessness to permanent housing destinations return to homelessness within 6 to 24 months <p>*Shelters targeting special populations, such as youth or those fleeing domestic violence, may have different outcomes, with exits to transitional housing as an acceptable and appropriate outcome</p>

	Program Description	Essential Program Elements	Time Frame	Population	Measurement
Warming Centers	<p>Low barrier, site based, temporary shelter to deal with an individual's or family's immediate housing crisis.</p> <p>Services are typically provided during cold weather months, with the primary purpose being to provide safe shelter to protect against the elements.</p>	<ul style="list-style-type: none"> • Low programmatic barriers to entry and shelter stay • As funding allows, operates 7 days a week from evening to morning. Ideally, open during the day when there is inclement weather • Can be accessed through CAM during CAM Business Hours; can always be accessed directly via the Warming Center provider • Sobriety is not a condition for entry • Identification is not a condition for entry • Safe physical environment • Access to sleeping space, bathing opportunities, and food items • Case management is provided to the extent that funding and staffing capacity allows. • Referrals should be made to CAM and or Outreach for clients utilizing services for 14 consecutive days 	Average length of stay under 90 days	All literally homeless who meet Categories 1, 2, or 4 of HUD's definition of homeless	<ul style="list-style-type: none"> • % of participants served will be entered into HMIS in accordance with the HMIS Policies & Procedures.

	Program Description	Essential Program Elements	Time Frame	Population	Measurement
Hotel/Motel Vouchers	Hotel or motel vouchers meant to address individuals' or families' immediate housing crises, should no appropriate emergency shelter be available.	<ul style="list-style-type: none"> ● To be used on an emergency basis when no other emergency shelter or safe housing options are available ● Low programmatic barriers for receiving vouchers ● Sobriety is not a condition for receiving vouchers ● Identification is not a condition for entry ● Safe physical environment ● Completes VI-SPDATs (as noted in the CAM Policies and Procedures) ● Creates a housing stabilization plan with the participant ● Provides housing case management ● Provides linkages to mainstream resources and services, including TANF, SNAP, SSI/SSDI, Medicaid/ Medicare, Children's Protective Services (CPS) etc. (case managers expected to help participants apply for benefits and navigate systems as needed). ● Cooperatively works with service providers within the system to provide needed services to consumers to quickly move them to permanent housing 	Length of stay should not exceed 30 days, except for rare and extreme circumstances	All literally homeless who meet Categories 1, 2, or 4 of HUD's definition of homeless	<ul style="list-style-type: none"> ● % of participants served will be entered into HMIS in accordance with the HMIS Policies & Procedures. ● % of participants who exit to permanent housing.

TRANSITIONAL HOUSING:

	Program Description	Essential Program Elements	Time Frame	Population	Measurement
Bridge Housing	Short-term temporary housing to facilitate the movement to permanent housing for an individual or family who has accepted an offer of permanent housing (that has been documented) but has not moved in yet.	<ul style="list-style-type: none"> • Temporary Housing is provided • Participants are required to pay 30% of their adjusted gross income towards their rent. • Services are not required • Access to Permanent Housing Service Provider is allowed for each participant/ family in bridge housing 	Average length of stay under 90 days	<p>Literally Homeless that meet Category 1 or 4 of HUD's definition of homeless AND</p> <p>Has accepted an offer of Permanent Housing but is awaiting housing location or approval</p>	<ul style="list-style-type: none"> • % of participants who move into permanent housing within 90 days

	Program Description	Essential Program Elements	Time Frame	Population	Measurement
Service-Intensive Transitional Housing	<p>Time-limited (up to 24 months) housing program intended to facilitate the movement of homeless individuals and families to permanent housing. Homeless persons may live in transitional housing programs for up to 24 months and receive supportive services that enable them to live more independently.</p> <p>Settings for TH: Transition in Place, scattered site, or project-based</p> <p>Limited to serving:</p> <ul style="list-style-type: none"> Youth ages 13 to 24 Persons fleeing/attempting to flee domestic violence Persons seeking substance abuse treatment <p>The project must meet the following guidelines:</p> <ul style="list-style-type: none"> the primary intent of the project is to serve homeless persons, the project verifies homeless status as part of its eligibility determination, and the actual project participants are predominantly homeless 	<ul style="list-style-type: none"> Household holds lease and/or occupancy agreement. Occupancy agreement must comply with HUD requirements. Participants are required to pay 30% of their adjusted gross income towards their rent. Barriers to entry should be low, but a project may require specific eligibility criteria to effectively serve priority populations (e.g., willingness/desire to participate in services). If Project-based: 24-hour residential environment (safe/structured setting, provision of meals or cooking space, access to laundry, storage, etc.) Participants supported to establish and implement housing stabilization plan to secure permanent housing upon program exit. Services that are tailored to the target population may include: <ul style="list-style-type: none"> Employment assessment and connection to employment services and/or education/GED services (as directed by the assessment) Financial counseling to help resolve rental arrears and/or debt, to establish budgeting skills, to establish savings plan, and /or other money management skills needed. Connections to mainstream benefits and services, including TANF, SNAP, SSI/SSDI, Medicaid/ Medicare, CPS, etc. (case managers expected to help participants apply for benefits and navigate systems as needed). Housing search assistance (either directly or through coordination with a partner). Assistance building (re-building) family and community support networks. 	<p>Up to 2 years of housing subsidy and case management</p> <p>Up to 6 months of follow-up services provided after exit</p>	<p>Literally Homeless that meet Category 1 or 4 of HUD's definition of homeless AND</p> <ul style="list-style-type: none"> Household is not able to be diverted Household is not initially slated for PSH Household does not meet the definition for being chronically homeless <p>Household has a score of 40-67 on the full F-SPDAT</p> <p>Individual has a score of 29-50 on the full SPDAT</p>	<ul style="list-style-type: none"> % households that exit to permanent housing % of all participants that gain employment income % of all participants that gain non-employment cash income % of participants that obtain mainstream benefits The extent to which persons who exit homelessness to permanent housing destinations return to homelessness within 6 to 24 months

Permanent Housing

Housing that is safe and stable where the household has a lease or sub-lease in their name, a subsidy is provided and voluntary services (as determined by assessment) to help in retaining the housing.

RAPID REHOUSING:

Program Description	Essential Program Elements	Time Frame	Population	Measurement
<p>Short to medium term housing assistance program that rapidly moves homeless individuals and families, regardless of disability or background, into appropriate permanent housing with needed services to maintain stability.</p> <p>The project must meet the following guidelines:</p> <ul style="list-style-type: none"> the primary intent of the project is to serve homeless persons, the project verifies homeless status as part of its eligibility determination, and the actual project participants are predominantly homeless at entry 	<ul style="list-style-type: none"> Individuals and families placed in leased based permanent housing with an initial lease of 12 months. Household holds lease and may remain in unit permanently (i.e., following exit from the program). The units in which rental assistance is provided must comply with HUD's rental reasonableness standards. Participants receiving medium-term rental assistance are required to pay a portion of their income towards their rent according to the following scale: <ul style="list-style-type: none"> Months 4 to 9: participant pays 10% of income towards rent Months 10 to 15: participant pays 20% of income towards rent Months 16 to 18: participant pays 30% of income towards rent Security Deposits: A security deposit may not exceed 1.5 times the rent Utility Deposits, Payments, and/ or Arrearages: Maximum 6 months or \$2,500, whichever comes first An individual or family may receive any combination of the following: short to medium-term rental assistance, and/ or security deposit, and/ or utility deposit, or arrears. Participants that have zero income at any point while receiving RRH assistance will not be denied assistance if they are otherwise eligible for assistance. Participants with zero income will not be required to pay a portion of their income towards rent. If it appears that the participant will need a longer subsidy than can be provided by RRH, all attempts should be made to assist the participant in securing such a subsidy. 	<p>Short-term rental assistance: up to 3 months rental assistance</p> <p>Medium-term rental assistance: 4-18 months of rental assistance. Participants receiving medium term rental assistance will be able to receive rental assistance in 3-month increments, up to a total of 18 months.</p>	<p>Category 1 or 4 homeless with an income of less than 30% of AMI (for ESG funded projects)</p> <p>People coming from street or shelter (for CoC funded projects)</p> <p>Referred and prioritized through appropriate VI/SPDAT Score</p>	<ul style="list-style-type: none"> Referral acceptance within X business days % of households served will achieve permanent housing within 60 days of referral so long as funds are available. "Available" means allocated, under contract and being reimbursed on a timely basis. % of those served are able to maintain housing without RRH assistance by 180 days % of those served are not literally homeless after one year % of those served are placed on the MSHDA Housing Choice Voucher (HCV) Homeless Preference wait list Increase in the percent of adults who gain or increase employment or non-employment cash income over time

	<ul style="list-style-type: none"> • Provision of case management to conduct individualized assessment and develop stabilization plan (which includes support mapping). Case management is required to meet with participants at least once monthly. • Provision of financial assistance (security deposits, utility assistance, short- to medium- term rental assistance) and services (legal assistance, mediation, credit/financial counseling, and connection to mainstream benefits/services). • Provision of housing search assistance (either directly or through a partner). • Provision of employment assistance (either directly or through a partner). • Connection to benefits and other mainstream resources. • Serves as liaison to landlords for the program. 			
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PERMANENT SUPPORTIVE HOUSING:

Program Description	Essential Program Elements	Time Frame	Population	Measurement
<p>Permanent Housing that is coupled with supportive services that are appropriate to the needs and preferences of residents. Individuals have leases, must abide by rights and responsibilities, and may remain with no program imposed time limits. Majority of projects serve households with a disabled head of household, but disability requirement will be based on subsidy source requirement.</p> <p>Settings for PSH: Project-Based, Tenant-Based</p> <p>Type of PSH: Leasing (Master Lease for those with high barrier, hard to lease populations) or Rental Assistance (Participant holds the lease directly with the landlord)</p> <p>The project must meet the following guidelines:</p> <ul style="list-style-type: none"> • the primary intent of the project is to serve homeless persons, • the project verifies homeless status as part of its eligibility determination, and • the actual project participants are predominantly homeless at entry 	<ul style="list-style-type: none"> • Household holds a lease. An initial lease of 1 year is required and may change to a month to month lease after the initial year. • If projects elect to charge rent, participants will pay no more than 30% of their monthly income toward rent • Subsidy can be deep or shallow subsidy and change over time based on the needs of the participant. • Assessment is conducted to determine service needs (this assessment is not used for eligibility but to develop the service plan). • Services are intensive, flexible, tenant-driven, voluntary, and offered in the participant’s housing if they so choose. • Primary focus of services is tenancy supports that help people access and remain in housing. • Additional focus of services is to connect tenants to or directly provide tenant-driven supportive services, including mental health services, substance abuse services, physical health services, benefits assistance, employment assistance, etc. • Providers should only use funder eligibility to screen participants, reducing barriers to entry (i.e., housing should be provided without clinical prerequisites for sobriety or completion of treatment, and reduced barriers for credit history and minor criminal convictions). • Annual reassessment using common assessment tool to determine ongoing services needed by the households and/or to determine the household’s readiness to “move-on” from PSH. • Coordinate with landlords/property managers to support tenancy and prevent evictions. 	<p>No time limits</p>	<p>Chronically homeless individuals and families and other highly vulnerable individuals and families (as determined by full SPDAT assessment and Score)</p>	<ul style="list-style-type: none"> • % of slots will be filled via coordinated entry • % who exit PSH project avoid subsequent homelessness at 6, 12, and 24 months • % of all participants gain non-employment cash income • % of all participants gain employment income • % who retain permanent housing (either retaining PSH or moving to other permanent housing)

SAFE HAVEN:

Program Description	Essential Program Elements	Time Frame	Population	Measurement
<p>A form of supportive housing that serves hard-to-reach homeless persons with severe mental illness who come primarily from the streets and have been unable or unwilling to participate in housing or supportive services.</p> <p>The project must meet the following guidelines:</p> <ul style="list-style-type: none"> • Must be located in a facility, meaning a structure, or structures, or clearly identifiable portion of a structure or structures; • Must have private or semi-private accommodations; • Must limit overnight occupancy to no more than 25 persons; • Must prohibit the use of illegal drugs in the facility; • Must provide access to needed services in a low demand facility, but cannot require program participants to utilize them; and • May include a drop-in center as part of outreach activities. 	<ul style="list-style-type: none"> • 24 hour site coverage by supportive staff • Linkage to treatment centers, both residential and outpatient. Treatment may include (but not necessarily be limited to) substance abuse, mental health, and/or physical rehabilitation treatment as per the needs and desires of the client. • Outreach and engagement services, as appropriate • Daily living services provided (e.g. meals, grocery shopping) • Low threshold admittance 	<p>No time limits</p>	<p>CoC funded Safe Havens are limited to serving individuals coming directly from the streets</p> <p>Literally homeless, hard to engage persons with serious mental illness or dual diagnosis (MI/SA) who are not currently engaged in housing or systems of care</p>	<ul style="list-style-type: none"> • % of participants will exit to more independent permanent housing at program exit • % of all participants exit with employment income • % of all participants exit with non-employment cash income • % of participants exit with non-cash benefits

AP-90 Program Specific (HOPWA)

I. Identify the method of selecting project sponsors and describe the one year goals for HOPWA funded projects:

A. Selection of Project Sponsors

The City of Detroit Health Department manages the HOPWA Program. The Health Department follows the City's procurement policy from the Office of Contracts and Procurement Department. The summary of the procurement process of selecting program sponsors for the HOPWA program are as follows:

"Request For Proposal" (RFP) application is issued for potential program sponsors based on the contract cycle. The RFP is open and available to the community, including grassroots, faith-based and all other community organizations for proposal bids. All RFP's are advertised on community websites, local and minority newspapers such as the Detroit News/Free Press and discussed at coalition and committee meetings. The evaluation and scoring for the proposals are based on an independent review panel made up of representatives of the community. Last cycle, there were only three proposals submitted and of the three, two were selected.

B. Goals for HOPWA funded projects

HOPWA's goals are based on community need and prior year activities.

GOAL: *"To connect HIV positive Detroit and Wayne County residence with Tenant Based Rental Assistance (TBRA), Community Residential/Transitional Housing, and Coordinated Supportive Services."*

1. Tenant Based Rental Assistance (TBRA)

- HOPWA's one year goal under TBRA is to assist 250 eligible individuals and their beneficiaries with Housing assistance which include, subsidized rental payments and Case Management services.

2. Community Residential/Transitional Housing

Two funded Agency's. One for HIV positive Men (including Transgender) and the other for HIV positive Women (including Transgender)

- a) Women: Goal, 15
- b) Men: Goal- 15

C. Supportive Services

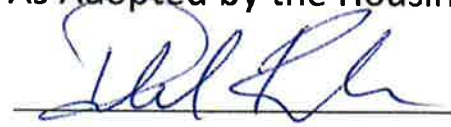
Client enrolled in the HOPWA program are provided Case Management services and through individualized Case Plans, support services are identified and managed.




CITY OF DETROIT
HOUSING & REVITALIZATION DEPARTMENT

RESIDENTIAL ANTI-DISPLACEMENT &
RELOCATION ASSISTANCE PLAN

As Adopted by the Housing and Revitalization Department


Director


Date

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I. Introduction

This Residential Anti-Displacement and Relocation Assistance Plan (the “Plan”) is prepared by the City of Detroit’s Housing and Revitalization Department (the “City”) in accordance with the Housing and Community Development (HCD) Act of 1974, as amended; and HUD regulations at 24 CFR 42.325 and is applicable to the CDBG, UDAG, HOME, Section 108 Loan Guarantee programs and such other grants as HUD may designate as applicable to City projects. These guidelines support compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (the “URA”) and section 104(d) of the Housing and Community Development Act of 1974 (the “HCDA”) where those acts apply. These guidelines also outline the City’s strategies for preventing displacement of residents in developments not receiving federal assistance, where the URA and the HCDA do not apply. The Plan outlines measures to be taken by the City to minimize displacement and describes the actions to be taken if and when displacement occurs, including steps for relocation assistance, notice for residents, and one-for-one replacement of lower-income dwelling units.

II. Minimizing Displacement

The City is committed to a policy of inclusive growth that minimizes displacement of families and individuals from their homes and neighborhoods as a result of any development activity. This policy is consistent with the goals and objectives of activities assisted under the URA and the HCDA as well as the City’s guiding principles. The City is committed to the following actions in support of this policy:

- Implementing steps outlined in the City’s Preservation Action Plan to preserve affordable housing units and prevent displacement of current residents
- Prioritizing affordable housing preservation projects in requests for *City support* and applications through the City’s Affordable Housing Leverage Fund¹
- Encouraging phased rehabilitation that allows tenants to remain in the building / complex during construction
- Requiring development partners receiving *City support* for any redevelopment project containing occupied units to submit relocation plans, affirming that all reasonable efforts have been made to avoid displacement of tenants (see Section IV)¹
- Providing relocation services through nonprofit partners as needed for persons who must be temporarily relocated during rehabilitations
- Limiting acquisition of residential properties to unoccupied structures or only to protect the health, safety, or welfare of residents, should a structure be occupied

III. Relocation Assistance

A residential occupant is considered to be *displaced* if he or she is permanently relocated, or temporarily relocated for over one year. Note that residential occupants will be considered *not displaced* if he or she will either (a) remain in his or her unit while work is being completed or (b) be temporarily relocated for less than one year. If and when displacement or temporary relocation occurs in *federally assisted* projects, the City will

¹ *City support* is defined as investment of federal housing development funds, investment of City funds, or sale of public land at below market value.

ensure that relocation assistance is provided for tenants in accordance with 24 CFR 42.350.² In addition, the City may choose to provide optional relocation assistance in the case where low-income tenants are displaced from non-federally assisted projects.

Required Relocation Assistance

Compliance with the URA is required in all occupied developments receiving federal assistance in order to minimize displacement of persons. When a lower-income person is displaced in connection with an assisted activity that results of the demolition of any dwelling unit or the conversion of a lower- income dwelling unit, the person is eligible for all relocation assistance required by the URA, including but not limited to:

- Advisory services as per 49 CFR 24
- Moving expenses as per 49 CFR 24
- Security deposits and credit checks as per 24 CFR 42.350(c)
- Interim living costs as per 24 CFR 42.350(d)
- Replacement housing assistance as per 24 CFR 42.350(e)

A displaced person who is not a lower-income tenant will be provided relocation assistance in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR Part 24. The City's Notice of Funding Availability (NOFA) requires owners and sponsors of all federally assisted developments to ensure compliance with all requirements of the URA and HCDA at their sole cost and expense.

The City will determine what relocation assistance is required, the relevant costs, and party responsible for identified costs. A written agreement will be made between sponsors, developers and the City prior to any displacement, stating who will be responsible for each portion of implementing the actions outlined in this Plan, and who will undertake the relocation duties. Payments for tenants will be paid following the review of monthly reimbursement documentation and the City will oversee the work to ensure that relocation payments to persons are provided in a timely manner.

Optional Relocation Assistance

In line with its policy of minimizing displacement due to development citywide, the City may opt to use CDBG or HOME Investment Partnership program funds to support relocation assistance for low to moderate income residents in non-federally assisted projects who are at risk of displacement. This investment can minimize the effects of displacement for occupants in formerly Low Income Housing Tax Credit (LIHTC) properties without HUD assistance following the three-year decontrol period, or in naturally occurring affordable housing³, through the provision of temporary and/or permanent relocation assistance.⁴ In the case of redevelopment to preserve existing affordable housing that requires substantial renovation, low to moderate income occupants may face the need for temporary relocation. In the case of substantial rent increases, foreclosure, sale to new owner, and/or exit of LIHTC affordability restrictions, low to moderate income occupants may face the need for

² Federally assisted projects or activities are assisted by HUD program funds subject to 24 CFR Part 570, Community Development Block Grant (CDBG), and/or 24 CFR Part 92, HOME Investment Partnerships (HOME) Program.

³ The City defines naturally occurring affordable housing as non-rent restricted housing that is priced affordably to households earning up to 60% of Area Median Income (AMI), however the City may provide relocation assistance to households earning up to 80% of AMI.

⁴ Affordability is based on standard of households spending less than or equal to 30% of gross income on housing expenses.

permanent relocation services. The provision of relocation services meets the CDBG national objective of providing benefit to low to moderate income persons (LMH, 3.2.3). Relocation services for lower income tenants meet the criteria for eligible activities serving eligible beneficiaries of HOME funds, as long as they apply to projects that create or preserve affordable housing units (24 CFR 92.205, 24 CFR 92.216).⁵ This assistance may include but is not limited to:

- Advisory services, including:
 - Assessment of client needs and development of individual case plans for temporary and/or permanent relocation as needed
 - Assistance in finding suitable and comparable temporary or permanent replacement housing
 - Review of leases or rental agreements as needed
 - In the case of temporary relocation, ongoing case management services to resolve conflicts and help tenants remain in temporary housing
- Payment of packing and reasonable moving expenses
 - Payment of late fees and/or costs associated with court cases
 - Payment of fees associated with obtaining birth certificates and other required identification
 - Payment of tenant back rent and/or utility bill clearance
 - Payments to clear outstanding balances with subsidized housing providers
 - Reasonable storage costs
- Payment of application fees, security deposits, pet fees, and cost of credit checks
- Interim living costs
- Replacement housing assistance
 - Replacement housing expenses covering rent and utility costs in excess of tenants' previous costs, up to 150% of tenants' previous costs

The City may provide program funds to a subrecipient, such as a nonprofit experienced in tenant relocation, to execute these services. These funds can be used to cover the cost of personnel performing services, or to cover direct tenant expenses. The scope of services will be detailed in a written subrecipient agreement, which will include requirements and tools for verifying eligibility of program participants. Agreements will also specify that subrecipients collect and submit performance monitoring data to assist the City in meeting its recordkeeping and reporting requirements per 24 CFR 507.503(b)(2), including:

- the number of qualified individuals served through temporary and permanent relocation assistance (including a breakdown by income level)
- For tenants served by temporary relocation, the length of stay, location, cost, and number of residents returned to original housing
- For tenants served by permanent relocation, the number relocated within a twenty-minute pedestrian radius and the number of residents relocated in Detroit
- Total cost and number of individuals served by type of relocation service

Payments for relocation assistance will be made either to an agency designated by the City to provide services, or may be made directly to landlords, utility or moving companies, etc. Expenses incurred by service

⁵ Where HOME funds are used, at least 90% of units are serving households with incomes at or below 60 percent of the HUD-adjusted median family income, and for projects with five or more units, at least 20% of units will serve households, in accordance with 24 CFR 92.216.

organizations will be reimbursed monthly upon submission of supporting documentation.

IV. Additional requirements

Relocation Plan

The City requires developers to submit relocation plans for any project involving acquisition and/or rehabilitation of occupied units in which the developer requests City support through federal programs or other City funds, or below market value land sale. The City will review all projects applying for funds in response to the City's Notice of Funding Availability (NOFA), and notify owner/sponsor when relocation plan is required. Relocation plans must include an inventory of current tenants by income; detailed project phasing; location, size and evidence of quality of temporary housing, where required; and a timeline for relocation.

Notice

For federally assisted projects where displacement is anticipated, owners and sponsors must provide general notice, notice of relocation eligibility and 90-day notice to each tenant as per 49 CFR 24.203.

For all projects where owner seeks to terminate existing affordability covenants, the owner must file notices with individual tenants at least 12 months and 6 months prior to the exit of affordability restrictions, per the City's municipal ordinance No. 25-1 (26-3), including owner contact information, details on the subsidy program to terminate, date of expected termination, and a description of tenants' legal rights. Owners must also file notice with the Director of the Housing and Revitalization Department providing details on underlying subsidy, total units, occupancy by elderly, disabled and family status, and current and anticipated rent schedules.

Recordkeeping

Owners and sponsors must maintain case files for displaced persons that include documentation sufficient to demonstrate that the owner verified an occupant's relocation needs, current situation, and eligibility for URA and HCDA assistance and payments. Case files should include adequate documentation to support owner determinations. The City may, if deemed necessary, request an additional evidence of compliance from owners and sponsors.

V. One-For-One Replacement of Lower-Income Dwelling Units

The City is committed to a strategy of preservation of existing lower-income dwelling units, and does not support the demolition or conversion of these units with HUD funds or other City resources. If occupied and vacant occupiable lower-income dwelling units were demolished or converted to a use other than lower-income housing in connection with a project assisted with funds provided under the CDBG and/or HOME Programs, the City would replace these units in accordance with 24 CFR 42.375. All replacement housing would be provided within three years of the commencement of the demolition or rehabilitation relating to the conversion and would meet the following requirements:

- Units located within the city
- Units meet all applicable City housing, building and zoning ordinances
- Units designed to remain low to moderate income dwelling units for at least 10 years from the date of initial occupancy

- Units meet the criteria of 49 CFR 24.2(d)(1) for *comparable replacement dwelling unit*.

If the City were to enter into a contract committing to provide funds for a project that would directly result in demolition or conversion of lower-income dwelling units, the City would make the plans public by publication in the locally circulated newspaper, Detroit Free Press, and submit to the HUD Field Office the following information in writing:

- A description of the proposed assisted project;
- The address, number of bedrooms, and location on a map of lower-income dwelling units that will be demolished or converted to a use other than as lower-income dwelling units as a result of an assisted project;
- A time schedule for the commencement and completion of the demolition or conversion;
- To the extent known, the address, number of lower-income dwelling units by size (number of bedrooms) and location on a map of the replacement lower-income housing that has been or will be provided.
- The source of funding and a time schedule for the provision of the replacement dwelling units;
- The basis for concluding that each replacement dwelling unit is designated to remain a lower-income dwelling unit for at least 10 years from the date of initial occupancy; and
- Information demonstrating that any proposed replacement of lower-income dwelling units with smaller dwelling units (e.g., a 2-bedroom unit with two 1-bedroom units), or any proposed replacement of efficiency or single-room occupancy (SRO) units with units of a different size, is appropriate and consistent with the housing needs and priorities identified in the HUD-approved Consolidated Plan and 24 CFR 42.375(b).

To the extent that the specific location of the replacement dwelling units and other data in items 4 through 7 were not available at the time of the general submission, the City would identify the general location of such dwelling units on a map and complete the disclosure and submission requirements as soon as the specific data is available.

Under 24 CFR 42.375(d), the City may submit a request to HUD for a determination that the one-for-one replacement requirement does not apply based on objective data that there is an adequate supply of vacant lower-income dwelling units in standard condition available on a non-discriminatory basis within the area.

VI. Appeals

Any displaced person who disagrees with a determination of eligibility for benefits or the amount of relocation assistance for which the person is eligible may file a written appeal to the City. Appeals will be promptly reviewed in accordance with the requirements of applicable law and 49 CFR Part 24.10. Further appeal, in writing, may be submitted to the HUD Detroit Field Office. If not satisfied with the HUD review, person has right to seek judicial review of that determination.

CITY OF DETROIT

RESOURCES FOR AFFIRMATIVELY FURTHERING FAIR HOUSING

RESOURCE	FUNDING AMOUNT
Community Development Block Grant (CDBG)	
Delray United Action Council	\$61,507
Legal Aid and Defender	\$75,000
Michigan Legal Services	\$150,000
Neighborhood Legal Services (Wayne County)	\$220,878
United Community Housing Coalition	\$369,589
Total	\$876,974

RESOURCE	FUNDING AMOUNT
City Of Detroit General Fund	
Civil Rights Inclusion & Opportunity (CRIO) (Fair Housing complaints & outreach)	\$173,945

Compliance with Section 106 of the National Historic Preservation Act of 1966

Every year, the U.S. Department of Housing and Urban Development (HUD) may allocate funds to the City of Detroit or other organizations or agencies which operate within the City of Detroit. Examples of HUD funding programs administered by the City may include, but are not limited to, the following: the Community Development Block Grant (CDBG) Program, the CDBG-Disaster Recovery (CDBG-DR) Program, the CDBG-Declared Disaster Recovery (CDBG-DDR) Program, the Self-Help Homeownership Opportunity Program (SHOP), the Housing Opportunities for Persons With AIDS (HOPWA) Program, the HOME Investments Partnerships (HOME) Program, the Lead Hazard Reduction Demonstration Grant (LHRDG) Program, the Special Purpose Grants Program, the Emergency Shelter Grant (ESG) Program, the Neighborhood Stabilization Program (NSP1 & NSP3), and the Public and Indian Housing Program. These funding programs support a broad range of housing and community development activities and projects. Examples of these projects include single-family and multi-family rehabilitation, property acquisition, property relocation, handicapped accessibility improvements, demolition, new construction, lead hazard reduction and redevelopment projects.

These activities or projects may affect historically- or culturally-significant buildings, properties or sites. The City of Detroit is responsible for ensuring that the activities or projects supported by these funds comply with all applicable historic preservation laws and regulations, one of them being Section 106 of the National Historic Preservation Act of 1966 (NHPA). The City ensures compliance through coordination and consultation with the appropriate regulatory authority per the Section 106 implementation regulations found in 36 CFR Part 800. For HUD-funded activities or projects within the City of Detroit, this authority is the Michigan State Historic Preservation Office (SHPO). However, the SHPO has delegated certain aspects of its authority to the City of Detroit through the use of a Programmatic Agreement (PA). The PA is the legal document that allows the City of Detroit to expedite the review of its HUD-funded activities or projects. This review process is facilitated and managed by the Preservation Specialist who is housed within the City of Detroit Housing & Revitalization Department. A copy of the PA, including a description of the review process, can be found in the attachment.

PROGRAMMATIC AGREEMENT
AMONG
THE MICHIGAN STATE HISTORIC PRESERVATION OFFICER,
THE CITY OF DETROIT, MICHIGAN AND
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING ADMINISTRATION OF THE
HOUSING AND COMMUNITY DEVELOPMENT PROGRAMS
FUNDED BY THE U. S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

WHEREAS, the U.S. Department of Housing and Urban Development (HUD) provides formula grant funding to the City of Detroit (City); and

WHEREAS, the City, by and through its Housing & Revitalization Department (HRD), now or may in the future, establish a program (Program) to administer HUD grant and/or entitlement programs with funds from HUD. Such HUD programs to be administered by the City through its Program may include but are not limited to the following programs: the Community Development Block Grant (CDBG) Program, the CDBG-Disaster Recovery (CDBG-DR) Program, the CDBG-Declared Disaster Recovery (CDBG-DDR) Program, the Self-Help Homeownership Opportunity Program (SHOP), the Housing Opportunities for Persons With AIDS (HOPWA) Program, the HOME Investments Partnerships (HOME) Program, the Lead Hazard Reduction Demonstration Grant (LHRDG) Program, the Special Purpose Grants Program, the Emergency Shelter Grant (ESG) Program, the Neighborhood Stabilization Program (NSP1 & NSP3), and the Public and Indian Housing Program, each as described in Appendix A of this Agreement; and

WHEREAS, the City's Program may encompass any of the following activities, each of which may constitute an Undertaking: single-family and multi-family rehabilitation, property acquisition, property relocation, handicapped accessibility improvements, demolition, new construction, lead hazard reduction and redevelopment projects; and

WHEREAS, for each of the HUD programs included in the City's Program, HUD is authorized to provide for the assumption of environmental review responsibilities by recipients of funding through each of the HUD programs to be administered by the City through its Program in accordance with HUD's environmental review procedures as set forth in 24 C.F.R. Part 58; and

WHEREAS, as a recipient of funding, the City has accepted responsibility of federal environmental review responsibility for the HUD programs to be administered by the City through its Program; and

WHEREAS, the City may assist the Detroit Housing Commission (DHC) as the Responsible Entity (RE) for projects that fall under the Public and Indian Housing Program; and

WHEREAS, due to the City's acceptance of federal environmental review responsibility, in accordance with section 104(g) of the Housing and Community Development Act of 1974, 42 U.S.C. 5304(g), the City, by and through its Planning & Development Department (PDD) has assumed federal agency responsibility for compliance with Section 106 of the National Historic Preservation Act of 1966 (NHPA), 54 U.S.C. § 306108, (Section 106); and

WHEREAS, the City has determined that the administration of its Program may have an effect on properties included in or eligible for inclusion in the National Register of Historic Places (NRHP) and has consulted with the Michigan State Historic Preservation Officer (SHPO) pursuant to Sections 106 and 110(f) of the NHPA and associated regulations contained in 36 CFR § 800.14(b); and

WHEREAS, the City, by and through its Historic Designation Advisory Board (HDAB), is responsible for the identification, documentation and surveying of all historic resources to determine their eligibility for the NRHP; and

WHEREAS, the City recognizes that the Bay Mills Indian Community, the Grand Traverse Bay Band of Ottawa and Chippewa Indians, the Hannahville Indian Community, the Ketegitigaaning Ojibwe Nation THPO / Lac Vieux Desert Band of Lake Superior Chippewa Indians, the Keweenaw Bay Indian Community of the Lake Superior Band of Chippewa Indians, the Little River Band of Ottawa Indians, the Little Traverse Bay Bands of Odawa Indians, the Mish-e-be-nash-she-wish Band of Potawatomi Indians of Michigan, the Nottawaseppi Huron Band of the Potawatomi, the Pokagon Band of Potawatomi Indians, the Saginaw Chippewa Indian Tribe, and the Sault Ste. Marie Tribe of Chippewa Indians (Tribes) may have sites of religious and cultural significance off Tribal lands, and therefore the City has invited the Tribes to engage in government-to-government consultation and, pursuant to 36 C.F.R. § 800.2(c)(2)(ii)(E), has invited the Tribes to enter into this Agreement to specify how the City and the Tribes will carry out Section 106 responsibilities; and

WHEREAS, the Bay Mills Indian Community, the Grand Traverse Bay Band of Ottawa and Chippewa Indians, the Hannahville Indian Community, the Keweenaw Bay Indian Community of the Lake Superior Band of Chippewa Indians, the Mish-e-be-nash-she-wish Band of Potawatomi Indians of Michigan, the Nottawaseppi Huron Band of the Potawatomi, and the Saginaw Chippewa Indian Tribe have not responded to the City's invitation to engage in government-to-government consultation on this Agreement; and

WHEREAS, the Little Traverse Bay Bands of Odawa Indians have declined the City's invitation to engage in government-to-government consultation, but have elected to consult on this Agreement as a consulting party and to enter into this Agreement as a concurring party; and

WHEREAS, the Ketegitigaaning Ojibwe Nation THPO / Lac Vieux Desert Band of Lake Superior Chippewa Indians, the Little River Band of Ottawa Indians, the Pokagon Band of Potawatomi Indians, and the Sault Ste. Marie Tribe of Chippewa Indians have accepted the City's invitation to engage in government-to-government consultation on this Agreement and to enter into this Agreement as a concurring party; and

WHEREAS, in accordance with 36 C.F.R. § 800.14(b)(2), the City has elected to develop this Programmatic Agreement (PA or Agreement) to govern the implementation of its Program, and on March 12, 2015, the Advisory Council on Historic Preservation (ACHP) chose to participate in consultation; and

WHEREAS, the Michigan Historic Preservation Network (MHPN), the National Trust for Historic Preservation (NTHP), and Preservation Detroit have been invited and agreed to provide comment to this Agreement.

NOW, THEREFORE, in consideration of the foregoing recitals, all of which are incorporated into this Agreement, and subject to the definitions provided in Appendix B, all of which are applicable throughout this Agreement, the City shall ensure that its Program is administered in accordance with the following

stipulations, which the City, the SHPO, and the ACHP (collectively, the Parties) agree shall satisfy the City's Section 106 responsibilities for all individual Undertakings administered under its Program:

STIPULATIONS

The City shall ensure that the following measures are carried out:

I. APPLICABILITY

- A. This Agreement shall apply only to those Undertakings funded, in part or in whole, by the Program, as set forth in 24 C.F.R. § 58.1(b), for which the City has assumed the authority of the Responsible Entity, as further specified in the Stipulations of this Agreement. Any Undertaking not governed by this Agreement shall be subject to compliance with the Section 106 review process as defined in 36 C.F.R. Part 800, Subparts A and B. This Agreement shall become effective only upon its execution by all Parties, pursuant to Stipulation XX of this Agreement.
- B. If a Federal agency or other entity acting under another Federal program has previously completed a Section 106 review and approved an Undertaking within the past five (5) years, the City has no obligation to complete a Section 106 review regarding that Undertaking, provided that the City:
 - 1. Adopts the findings and determinations of the previous Section 106 review;
 - 2. Confirms that the scope and effect, as defined by 36 C.F.R. § 800.16(i), of its Undertaking are the same as the scope and effect of the previous Undertaking; and
 - 3. Determines that the previous review was completed in compliance with Section 106.
 - 4. Document its findings and determinations in its project file that all requirements of Section 106 for the Undertaking have been satisfied.

If the City, in consultation with the SHPO, determines that the previous Section 106 review was insufficient or involved interagency disagreements about eligibility, effect, and/or treatment measures, the City shall conduct a new Section 106 review in accordance with the Stipulations of this Agreement.

II. QUALIFIED PERSONNEL

- A. The City shall employ a staff person or contract with a consultant who shall have professional qualifications in architectural history, historic architecture, or related fields in accordance with the Secretary of the Interior's Professional Qualification Standards, as set forth in 36 C.F.R. Part 61 (Qualification Standards). Such person (Preservation Specialist) will be responsible for administering those Stipulations of this Agreement requiring their particular expertise and for coordinating with appropriate City departments, authorities, and agencies regarding Undertakings included in the City's Program.
 - 1. If the Preservation Specialist vacates, is removed from, or otherwise leaves his or her position as Preservation Specialist, the City will employ a replacement staff person or contract with a replacement consultant who meets the Qualification

Standards to serve as the Preservation Specialist, and will notify the SHPO within fifteen (15) calendar days of the change, including submission of the replacement Preservation Specialist's qualifications.

2. If the City determines that it cannot secure a replacement Preservation Specialist, it shall comply with regulations contained in 36 C.F.R. Part 800, and forward documentation to the SHPO for review.
- B. The HDAB staff person(s) meeting the Qualification Standards will assist the Preservation Specialist in the identification and evaluation of Historic Properties covered under the Stipulations of this Agreement.

III. SURVEY AND EVALUATION

- A. Survey and evaluation of properties will be conducted using a two-tiered approach.
1. *Tier I: Survey*, will include a survey of Detroit guided by the implementation of a Historic Preservation Plan, described in Stipulation XIII of this Agreement.
 2. *Tier II: Evaluation*, will include the review of individual Undertakings included in the City's Program as such Undertakings are submitted to the Preservation Specialist.

B. TIER I: SURVEY

1. Through the HDAB, the City will conduct a survey of Detroit to identify districts, sites, buildings, structures, and objects that meet the criteria for listing in the NRHP. This survey will be guided by the City's implementation of a Historic Preservation Plan, described in Stipulation XIII of this Agreement.
2. The City will reach out to other public and private agencies who may have their own information regarding previously surveyed areas of the city. This information will help to inform survey decisions within the Preservation Plan. Agencies included, but are not limited to the following: Michigan Department of Transportation (MDOT), U.S. Treasury Department, and the Detroit Land Bank Authority (DLBA).
3. The first survey will commence within six (6) months after the implementation of the Historic Preservation Plan. All surveys will be planned in coordination with PDD and the SHPO and will be conducted and/or supervised by HDAB staff.

C. TIER II: EVALUATION

Properties forty-five (45) years of age or older within the Area of Potential Effects (APE) of an Undertaking covered by this Agreement shall be evaluated by the Preservation Specialist.

1. The Preservation Specialist will evaluate properties located within the APE for NRHP eligibility within seven (7) calendar days following the receipt of adequate documentation, as identified in Stipulation IV.B, from the City department,

agency, or authority requesting the review.

2. The Preservation Specialist will consult with HDAB staff to determine if the property meets the criteria for listing in the NRHP, either individually or as contributing to a historic district. HDAB staff will provide its determination within seven (7) calendar days of receipt of a written review request from the Preservation Specialist.
3. If the Preservation Specialist and the HDAB staff do not reach an agreement regarding the eligibility of a property for listing in the NRHP, the Preservation Specialist will submit documentation to the SHPO regarding the eligibility of the property. The SHPO will provide written comments within thirty (30) calendar days following the receipt of adequate documentation which, at a minimum, will include the following:
 - a. **For Individual Properties** - A completed SHPO "Historical Significance Response Sheet", a survey card, photographs of the property as well as streetscape views, a map indicating the property's exact location, and a brief history, including when the structure was constructed, the name of the architect or builder, the names of early and subsequent occupants of the structure and any history associated with those occupants.
 - b. **For Districts** - Maps, photographs, a statement of significance, a physical description, a listing of all the addresses of the properties within the district, and whether or not they are contributing or non-contributing.
4. If the City, through the Preservation Specialist, and the SHPO disagree about the eligibility of a property for listing in the NRHP, the City will request a formal determination of eligibility in accordance with the procedures set forth in 36 C.F.R. § 800.4(c)(2).

IV. PROJECT REVIEW PROCESS

- A. **Programmatic Exemptions.** The Parties agree that the following types of Undertakings have limited potential to affect Historic Properties and do not require further review from the SHPO.
 1. Undertakings, the effects of which are limited to properties that are less than forty-five (45) years old, unless the affected properties could meet Criterion Consideration G (A property eligible if it is of exceptional significance).
 2. Undertakings limited exclusively to interior portions of single-family residential properties where the proposed work will not be visible from the property's exterior, unless that building is individually listed or eligible for listing in the NRHP, in accordance with ACHP's *Policy Statement on Affordable Housing and Historic Preservation*, dated November 9, 2006.
 3. Undertakings limited exclusively to the activities listed in Appendix C of this

Agreement.

The Preservation Specialist shall be responsible for determining whether the scope of work of an Undertaking is limited to these types of Undertakings. The City will retain individual project files for each Undertaking reviewed in accordance with this stipulation as verification that the scope of work was limited to these Undertakings.

- B. **Adequate Information for Review Requests.** The Preservation Specialist shall ensure that Undertakings reviewed under Stipulation V.B of this Agreement and determined to affect one or more Historic Properties will be treated in accordance with Stipulation V and Stipulation VI of this Agreement. The City department, agency, or authority responsible for the administration of the HUD funded program (i.e. PDD, HRD, DBA) and/or HUD program fund recipients shall submit, at a minimum, a review request to the Preservation Specialist with all appropriate information necessary to perform a project review prior to commencing any work on Undertakings covered by this Agreement as follows:

1. For all Undertakings covered by this Agreement, information shall include:
 - a. Address of property or properties, including Parcel ID Number(s);
 - b. Name of City department/agency/authority making the request;
 - c. Type of Undertaking (demolition, rehabilitation, etc.);
 - d. Name of HUD program (CDBG, HOME, etc.), and;
 - e. At least two (2) photographs of the subject property taken in the past thirty (30) calendar days.
2. **Historic Property Rehabilitation Projects.** Information for rehabilitation Undertakings affecting Historic Properties shall include project specifications and detailed photographs of all work items.
3. **Site Improvement Projects.** Information shall include a description of the work to be completed and maps showing the location of the work.

The City will detail further any additional requirements for project review requests in accordance with Stipulation XII of this Agreement. These procedures will outline how historic preservation reviews are to be coordinated and identify the documentation that the City departments, agencies, and authorities must retain in individual project files.

- C. **Eligibility Determination.** The Preservation Specialist shall determine, in consultation with HDAB staff, if the project APE contains any Historic Properties.

1. In making the determination, the Preservation Specialist will review existing literature, including the following resources:
 - a. City-generated maps of properties and districts previously listed in the NRHP;
 - b. City-generated maps of properties and districts previously determined eligible for the NRHP;

- c. City-generated maps of properties and districts designated as Local Historic Districts; and
 - d. Mapping and data collected in the Tier I Survey as detailed in Stipulation III of this Agreement.
2. The Preservation Specialist will also follow the protocol delineated in the *Tier II Evaluation* section in Stipulation III of this Agreement.
 3. If the Preservation Specialist determines that the APE of the Undertaking includes no Historic Properties, the Preservation Specialist will provide written notification to the City department, agency, or authority that the project may proceed without further coordination.
 4. If the Preservation Specialist determines that the APE of the Undertaking includes one or more Historic Properties, the Preservation Specialist shall provide written notification to the City department, agency, or authority that implementation of the Undertaking shall be in accordance with Stipulation V of this Agreement.

V. TREATMENT OF HISTORIC PROPERTIES

The City shall ensure that Historic Properties are treated in accordance with the following Stipulations:

A. Property Acquisitions

1. Upon the acquisition of a Historic Property using Program funds, the City will secure, stabilize and preserve the Historic Property pending its disposal. The methods used to secure and stabilize these properties shall adhere to the Secretary of the Interior's *Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* (the *Secretary's Standards*) and *Preservation Brief 31, Mothballing Historic Buildings* (U.S. Department of the Interior, National Park Service, September 1993).
2. Prior to the transfer or lease of Historic Properties acquired with Program funds, the City shall consult with the SHPO to determine the need for a preservation easement. If it is determined that a preservation easement is necessary, the City shall submit the proposed preservation easement to the SHPO for review and approval. If the SHPO does not approve of the proposed preservation easement, the City shall request the ACHP's comments pursuant to Stipulation XVII of this Agreement.

B. Rehabilitation and Public Improvement Projects

1. **Residential and Commercial Rehabilitation Projects.** The City shall ensure that all Undertakings involving residential rehabilitation and commercial rehabilitation projects funded by the Program involving Historic Properties are carried out in accordance with the *Secretary's Standards*. The Preservation Specialist will review and approve all plans and specifications or work write-up prior to the initiation of Program activities.

2. **Site Improvement Projects.** The City shall ensure that Undertakings involving site improvement projects funded by the Program that might impact one or more Historic Properties include sidewalk improvement projects, re-paving of streets, installation of landscaping, street lighting and street furniture and other infrastructure improvements, and adhere to the *Secretary's Standards*. Site improvement projects affecting historic parks shall meet the standards in "Guidelines for Treatment of Cultural Landscapes" (National Park Service, 1996).
3. If the *Secretary's Standards* cannot be met, or if the contemplated action could otherwise have an adverse effect on Historic Properties, the City will consult with the SHPO as per Stipulation XVII.
4. The City will retain work descriptions, before and after photographs of the Historic Properties proposed for or impacted by either rehabilitation or site improvement projects funded by the Program, and the comments of the Detroit Historic District Commission (HDC) when applicable in individual project files. Before and after photographs may be used as evidence of the City's proper application of the *Secretary's Standards*. All files shall be retained for a minimum of three (3) years following project implementation.

C. Relocation of Historic Properties

1. Prior to the relocation of a Historic Property using Program funds within, into or out of a listed or eligible historic district, or the relocation of individual buildings listed on or eligible for listing on the NRHP, the City shall consult with the SHPO to identify an acceptable alternative site, preferably within the same district.
2. If the SHPO approves the alternate site, the City shall ensure that the Historic Property is moved by qualified movers in accordance with approaches recommended in *Moving Historic Buildings* (John Obed Curtis, 1979). Once the property is relocated, the City, in consultation with HDAB staff, will re-evaluate the eligibility of the Historic Property for listing in the NRHP.
3. If the SHPO objects to the alternate site, the City and the SHPO shall consult, pursuant to Stipulation XVII of this Agreement.

D. Accessibility for Disabled Persons

1. The City shall explore alternative methods for providing accessibility to Historic Properties in accordance with the Americans with Disabilities Act (ADA) and its implementing regulations, as well as other local and federal requirements for accessibility. To the extent feasible, accessible features will be placed on secondary elevations of Historic Properties and will not result in the removal of a Historic Property's significant architectural features. The design of accessible features shall be consistent with the *Secretary's Standards*, National Park Service Preservation Brief No. 32 entitled *Making Historic Properties Accessible* (1993), and the Department of Interior report entitled, *Access to Historic Buildings for the Disabled: Suggestions for Planning and Implementation* (1980).
2. The City will retain documentation regarding alternatives as part of the individual project files.

3. The City will consult with the SHPO, including submitting documentation of alternate methods of creating access for Disabled Persons, when such projects will have an adverse effect on the historic and/or architectural character of a Historic Property.

E. Demolition

1. The City may proceed with the demolition of properties determined ineligible for listing on the NRHP or Historic Properties that have lost their integrity as determined by the Preservation Specialist, subject to concurrence by HDAB, without further review.
2. The City shall submit adequate documentation to the SHPO for review and comment regarding the proposed demolition of a Historic Property. The exact requirements of the submittal to the SHPO are provided in Appendix D of this Agreement.

F. New Construction and Additions

1. Proposals for new construction and additions using Program funds within or adjacent to a historic district, or adjacent to properties listed in or eligible for listing in the NRHP, will be developed in accordance with the guidelines for new construction contained in the *Secretary's Standards*.
2. The City shall ensure that the design of infill construction on vacant parcels within historic districts adheres to the *Secretary's Standards* and is developed in consultation with the SHPO. If the SHPO approves a prototype design for infill construction within a neighborhood or historic district, the City may request review and approval of Undertakings involving construction projects using the prototype design without further review of the design documents. If the prototype design cannot be adhered to, the City shall submit a modified design to the SHPO for review and approval.
3. Preliminary plans will be developed in consultation with the SHPO. Final plans and specifications will be submitted to the SHPO for review and comment prior to initiation of construction activities. The SHPO will have thirty (30) calendar days from the date of the receipt to review and comment on the final plans and specifications.

G. Redevelopment Projects

1. The City will consult with the SHPO during the preparation of redevelopment or urban renewal plans for neighborhood, historic district, or target areas using Program funds. The City will afford the SHPO an opportunity to comment on the document during the draft stages. The SHPO will evaluate the potential effect that the goals, objectives and implementation strategy of the plan will have on Historic Properties. The SHPO's comments will be integrated into the plan or referenced in the document before it is submitted for required local administrative reviews.
2. The City, in consultation with the SHPO, will determine whether the

redevelopment or urban renewal plan should be implemented under the terms of this Agreement or whether a project-specific MOA should be developed in accordance with 36 C.F.R. § 800.6. The City will notify the ACHP of the SHPO's determination and, if appropriate, provide the ACHP with background documentation to initiate the consultation process.

VI. ARCHEOLOGICAL RESOURCES

- A. All Undertakings located within the geographic area described and delineated in Appendix E of this Agreement shall be reviewed for archeological resources by the SHPO's archaeologist, subject to the following exclusions:
1. Building rehabilitation projects that require no ground disturbing activities.
 2. Programmatic exemptions listed in Appendix C of this Agreement.
- B. All Undertakings using Program funds and involving sites ½-acre or larger and located outside of the geographic area described in Stipulation VI.A of this Agreement shall be reviewed for archeological resources by the SHPO's archaeologist, subject to the following exclusions:
1. Building rehabilitation projects that require no ground disturbing activities.
 2. Programmatic exemptions listed in Appendix C of this Agreement.
- C. When an undertaking qualifies for review by the SHPO as described in Stipulations VI.A and VI.B of this Agreement, the City shall consult with the SHPO's archaeologist to determine whether archeological resources, including human remains, are present at those project locations. The City will submit the following information via electronic mail to the SHPO's archaeologist with a request for comments from the SHPO's archaeologist within fourteen (14) calendar days:
1. Address of property or properties to be reviewed;
 2. USGS 7.5' Quadrangle with the project location(s) clearly marked;
 3. Project type (demolition, rehabilitation, etc.);
 4. Brief description of the project site including size (acres) and any previous ground disturbance; and,
 5. Brief description of the Undertaking, including the length, width, and depth of any ground disturbing activities.
- D. If the SHPO's archaeologist determines that an archeological monitoring is required, the City shall employ archeologists or contract with a consultant who shall meet the Qualification Standards to assist in the identification and evaluation of potentially eligible archeological sites and their recommended treatments. The City may also notify Tribes following the protocol delineated in Stipulation VII of this Agreement. If archeological resources are identified that meet the NRHP criteria, they will be avoided or preserved in

place, if feasible.

- E. If the City determines that it is not feasible to preserve or avoid NRHP-eligible or listed archeological resources, the City shall consult with the SHPO's archaeologist to develop a treatment plan consistent with the ACHP's publication, *Treatment of Archeological Properties: A Handbook* (1980). The City shall ensure that the plan is implemented by a qualified archaeologist once it is approved by the SHPO archaeologist.
- F. The City shall hold a meeting between the PDD staff, SHPO archaeologist, and the Preservation Specialist one (1) calendar year from the execution of this Agreement. In addition to providing an opportunity for the Parties to review the specific information described in Stipulations VI.A-E of this Agreement, such meeting will also provide an opportunity to assess the overall effectiveness of the archaeology review procedures adopted by the City.
- G. If, during the first year of implementation, the following conditions are found to exist within the geographic area defined in Appendix E of this Agreement, then the demolition of any single-family residential structures within this area will be excluded from further review by the SHPO archaeologist:
 - 1. The total number of single-family residential demolition reviews is equal-to or less-than ten (10); and/or,
 - 2. Reviews of single-family residential demolition projects conducted by the SHPO archaeologist have not resulted in the identification of NRHP-eligible or listed sites.

VII. TRIBAL CONSULTATION

- A. The City will notify Tribes that are concurring parties to this Agreement and that have an interest in Program Undertakings located in Detroit and have concurred on the Agreement, if the Undertaking qualifies for review by the SHPO's archaeologist as stated in Stipulation VII of this Agreement.
- B. The City will notify these Tribes of these Undertakings and provide these Tribes an opportunity to:
 - 1. Identify concerns about Historic Properties;
 - 2. Advise on the identification and evaluation of Historic Properties, including those of traditional religious and cultural importance to them, and articulate their views of the Program's effects on such properties;
 - 3. Participate in the resolution of adverse effects, and indicate any areas of concern with which they wish to be advised of any individual Undertakings.
- C. The City shall submit the following information via electronic mail to these Tribes with a request for Tribal comments within fourteen (14) calendar days:

1. Address of property or properties to be reviewed;
 2. USGS 7.5' Quadrangle with the project location(s) clearly marked;
 3. Project type (demolition, rehabilitation, etc.);
 4. Brief description of the project site including size (acres) and any previous ground disturbance;
 5. Brief description of the undertaking, including the length, width and depth of any ground disturbing activities; and,
 6. Copies of any project-related correspondence the City has received from the SHPO.
- H. If within fourteen (14) calendar days there is no response or if no objections are raised by any of these Tribes, the City may proceed with the proposed Undertaking. If any of these Tribe objects to the proposed Undertaking, the City will work with the Tribe to resolve its objections.
- D. The City shall ensure, to the extent allowed by applicable laws, including Section 304 of the National Historic Preservation Act, as amended, and Section 13(1)(o) of the Michigan Freedom of Information Act, M.C.L. § 15.243 (2)(o), that its consultation with other consulting parties shall not include the dissemination of information that might risk harm to a Historic Property or that might impede the use of any site by these Tribes.

VIII. PUBLIC PARTICIPATION

- A. Each year the City will notify the public of the City's current HUD-funded Program Undertakings and make available for public inspection documentation about the City's Program. Available in this documentation will be general information on the type(s) of Undertakings supported by HUD funds; information on identified Historic Properties in communities that might be affected by such Undertakings; the amount of HUD funds available in the current program year; how interested persons can advise the City of any comments or concerns they may have about the HUD program, and its effect on Historic Properties. A copy of said notice shall be posted in the Michigan Chronicle and on the City of Detroit website. A copy of the notice will also be provided to the Department of Neighborhoods (DONs), Preservation Detroit, the MHPN, the ACHP, the NTHP, the Detroit Historic Neighborhood Coalition, historic district neighborhood associations, and the SHPO.
- B. The City's Housing & Revitalization Department (HRD) annual Consolidated Plan for HUD-funded Programs shall include, at a minimum, a summary of the Section 106 process and a description of this Agreement and the City's requirements hereunder.
- C. **Public Objections and Disputes.** At any time during the implementation of the measures stipulated in this Agreement, if a member of the public raises an objection to any such measure or the manner of its implementation, the City shall take the objection into account and consult as necessary with the objecting party, the SHPO, or the ACHP to resolve the

objection.

1. Subject to all applicable requirements of the Michigan Open Meetings Act, P.A. 267 of 1976, the City may request the member of the public raising the objection to submit in writing, either by mail or electronic mail, a letter to the Preservation Specialist with the following information:
 - a. Contact information (Full Name, Address, Phone Number, Email);
 - b. Address or location of the project; and,
 - c. A summary of the objection.
2. Upon receipt of a written objection, the City will proceed to consider the objection and consult, as necessary, with the objecting party and the SHPO to resolve the issue, for a period of time not to exceed fifteen (15) calendar days.
3. If the City is unable to resolve the objection to the satisfaction of the objecting party, the Preservation Specialist will forward all relevant documentation to the ACHP. The City will consider any ACHP comments in reaching a final decision regarding the objection.

IX. UNANTICIPATED DISCOVERIES

If previously unidentified Historic Properties, or unanticipated effects, are discovered after the City has completed its review under this Agreement, no further work will proceed in the area of the discovery until the requirements of 36 C.F.R. § 800.13 have been satisfied. The City shall consult with the SHPO and appropriate consulting parties to record, document, and evaluate the eligibility of the Historic Property for the NRHP and the project's effect on the Historic Property. The City will consult with any participating Tribes that may attribute traditional cultural or religious significance to an affected Historic Property. If neither the SHPO, consulting parties, or Tribes submit any objection to the City's plan for addressing the discovery within 48 hours, the City may carry out the requirements of 36 C.F.R. § 800.13, and must notify the ACHP only if there is an adverse effect.

X. DISASTERS AND EMERGENCY REVIEW PROCEDURES

A. Determine Expedited Review

1. In response to a disaster or emergency situation declared by the President, a tribal government, or the Governor of a State, or which respond to other immediate threats to life or property, the City may conduct expedited reviews of emergency Undertakings pursuant to 36 C.F.R. § 800.12(c). The time frame for expedited reviews shall be determined between the City and the SHPO following a declared disaster or emergency situation.
2. Should the City determine that it is necessary to extend the expedited review period for emergency Undertakings beyond the initially agreed upon time frame, the City shall, in 30-day increments, as needed, notify in writing the ACHP, SHPO and

participating Tribe(s) pursuant to 36 CFR § 800.12(d) .

B. Conduct Expedited Reviews

1. If the emergency Undertaking is an immediate rescue and salvage operation conducted in response to an event to preserve life and property, the City has no Section 106 consultation responsibilities in accordance with 36 C.F.R. § 800.12(d); or
2. If the emergency Undertaking meets one or more of the Programmatic Exemptions in Appendix C of this Agreement, the City shall complete the Section 106 review process pursuant to Stipulation IV.A of this Agreement.
3. If the City determines that the emergency Undertaking would adversely affect a Historic Property during this expedited review period:
 - a. To the extent practicable, the City will propose treatment measures that would address adverse effects during implementation, and request the comments of the SHPO and participating Tribe(s) within three (3) calendar days of receipt of this information unless the City of Detroit determines the nature of the emergency warrants a shorter time period.
 - b. The City may provide this information through written requests, telephone conversations, meetings, or electronic media. In all cases, the City shall clarify that an "expedited review" is being requested for the Undertaking.
 - c. The City shall take into account comments timely provided by the SHPO and/or participating Tribe(s) in deciding how to proceed.
 - d. If neither the SHPO nor any participating Tribe comments within three (3) calendar days, the City may complete Section 106 review for the Undertaking based on the available information.
 - e. The City shall notify the SHPO and participating Tribe(s) of the final decision, indicating how any comments received were considered in reaching that decision.
 - f. The City shall provide the SHPO, ACHP and/or participating Tribe(s) a narrative report documenting the actions taken in accordance with this expedited consultation process within six (6) months following the initiation of the expedited consultation.

XI. COORDINATION WITH OTHER FEDERAL PROGRAMS

- A. A Federal agency providing permits, licensing, or financial assistance for a Program Undertaking covered under the terms of this Agreement may, with the concurrence of the City and the SHPO, satisfy its Section 106 compliance responsibilities by complying with the terms of this Agreement. In such situation, the City and the Federal agency shall notify the SHPO and ACHP in writing of their intent to use this Agreement to attain compliance with Section 106 requirements.

- B. If neither the SHPO nor the ACHP respond within fourteen (14) calendar days of receipt of such a notice of intent, the City and the Federal agency may assume SHPO and ACHP concurrence, as referenced above. Copies of all such notification letters shall be maintained in the files established by the Preservation Specialist for each such undertaking.
- C. The Federal agency shall make an official determination based on the results of the Section 106 review of the Undertaking conducted under this Agreement. The Federal agency shall notify the SHPO and ACHP in writing of this determination.
- D. For rehabilitation projects subject to Federal Rehabilitation Tax Credit review by the SHPO and National Park Service (NPS) and/or local historical review, the Preservation Specialist will consult with the relevant SHPO staff and Historic District Commission Staff to discuss coordination of compliance requirements.

XII. PROJECT COORDINATION

A. Internal Review Procedures

1. Within ninety (90) calendar days following the execution of this Agreement, the City will fully develop, adopt, and implement internal procedures to ensure that all Program Undertakings that will affect or have the potential to affect Historic Properties are forwarded to the Preservation Specialist for review, pursuant to this Agreement. The procedures will outline how historic preservation reviews are to be coordinated and the documentation the departments are to retain in individual project files. The City will forward a copy of the procedures to the SHPO.
2. The City will ensure that appropriate City department, agency, and authority staff are provided copies of this Agreement and the internal review procedures. The City will ensure all sub-recipients of HUD funding in the City are aware of this Agreement and its requirements, including the requirement to complete the Section 106 review in coordination with the Preservation Specialist prior to the commencement of project activities.
3. The City shall take appropriate measures to ensure that Program Undertakings, including the issuance of Certificates of Appropriateness, Notices to Proceed, BSEED building permits, construction permits, and demolition permits, all as related to Historic Properties, are not implemented until the City department, agency or authority has received written clearance from the Preservation Specialist.

- B. **Training Manual for the Preservation Specialist.** Within six (6) months following the effective date of this Agreement, the City will fully develop and adopt a training manual for the Preservation Specialist. The manual will outline the roles and responsibilities of the Preservation Specialist as they relate to the execution of the terms of this Agreement requiring their particular expertise and for coordinating with appropriate City departments, authorities and agencies regarding Program assisted undertakings. It will also include specific guidance regarding the internal review procedures to be developed in accordance with Stipulation XII.A of this Agreement. The City will forward a copy of the training manual to the SHPO.

XIII. HISTORIC PRESERVATION PLAN

The City, in consultation with the SHPO and local stakeholders, shall develop and implement a comprehensive Historic Preservation Plan for Detroit. The Plan will include, but is not limited to, an analysis of current information related to historic properties, the current role of historic preservation in the City, goals and priorities in regard to the role of historic preservation in Detroit, and specific policy guidance for City officials relating to historic preservation.

XIV. REVISIONS TO THE COMPREHENSIVE MASTER PLAN

Prior to any modification to the City's Comprehensive Master Plan of Policies, the City will provide reasonable notice of the modification, including a copy the proposed modification, to the SHPO. The SHPO may provide comments to the City and the City shall consider those comments as part of the modification.

XV. TECHNICAL ASSISTANCE AND TRAINING

The SHPO staff will provide technical assistance, consultation, and training as requested by the City in order to assist the City in carrying out the terms of this Agreement. The City, assisted by the SHPO, will provide guidance documents to City staff to assist in compliance with the Stipulations of the Agreement.

XVI. IMPLEMENTATION STATUS MEETINGS

A. Meetings and Reports

1. A meeting between the Parties, and including any consulting parties, will be initiated by the City and held one (1) calendar year from the effective date of the Agreement.

In addition to providing the opportunity for the Parties to review the specific information described in Stipulation XI.A.3., the meeting described in this Stipulation will also provide parties an opportunity to assess the Agreement's overall effectiveness in addressing the preservation of Historic Properties located within Detroit. Specifically, the meeting will provide the Parties an opportunity to discuss planning, design review, and implementation of undertakings affecting Historic Properties within Detroit and to discuss and evaluate the following issues:

- a. Whether consultations, when required by this Agreement or carried out pursuant to 36 C.F.R. Part 800, have been initiated early enough in the planning process to ensure consideration of potential alternatives to avoid, minimize, or mitigate harm to Historic Properties.
- b. Whether undertakings affecting Historic Properties within the City have adhered to the *Secretary's Standards*, to the extent that adherence to such Standards are required under this Agreement.

- c. Whether there has been effective coordination between the Preservation Specialist and appropriate project managers and contract personnel assigned responsibilities affecting Historic Properties.
 - d. Whether problems or misunderstandings have arisen in the course of consultations, and if so, how these problems were resolved and how they could be avoided in the future.
 - e. Whether there is a need to hold regularly scheduled implementation status meetings.
2. Participants at the meeting on behalf of the City may include staff from PDD and HDAB, as well as any other City departments, agencies, or authorities that administer HUD funds, and the Preservation Specialist.
3. At least two (2) weeks prior to the meeting, the Preservation Specialist will provide the parties and the consulting parties with the following information:
- a. A summary of actions taken under Stipulations V, VI, and VII of this Agreement since the effective date of the Agreement. The summary shall contain:
 - i. Address and historic categorization. If the Undertaking is located in a historic district, the name of the district shall be included.
 - ii. A brief description of the proposed Undertaking.
 - iii. Determination of effect.
 - iv. Date of project review.
 - v. A list of properties determined in the reporting period to be individually eligible for listing on the National Register of Historic Places.
 - vi. A summary of any training given pursuant to Stipulation XV of this Agreement.
 - vii. Notification of any Preservation Specialist staff changes.
 - b. A summary of any planning activities in the City subject to consultation with the SHPO pursuant to Stipulation XIV of this Agreement.
 - c. A brief summary of any and all areas surveyed since the previous meeting.
 - d. A map indicating the area(s) surveyed since the previous meeting.
 - e. A brief description of any and all historic districts determined eligible for listing in the National Register of Historic Places, including boundaries for those area(s).

- f. A brief description of any and all area(s) determined to be not eligible for listing in the National Register of Historic Places, including boundaries for those areas(s).
 - g. A description and location of any and all local historic districts established by the City since the previous meeting.
4. The parties to this Agreement shall meet at least six (6) months before the expiration of this Agreement to determine whether this Agreement should be extended beyond the expiration date, as established pursuant to Stipulation XX of this Agreement. The Preservation Specialist shall be responsible for convening this meeting. The City shall notify the public of this meeting and shall invite the public to submit comments to the SHPO and ACHP regarding the effectiveness of the Agreement prior to the scheduled meeting.

B. File Retention.

- 1. The City shall retain individual project files containing determinations of eligibility, the comments of the SHPO, if applicable, written authorization from the Preservation Specialist, specifications and work write-ups, "before" and "after" photographs and other pertinent documentation for at least three (3) years following the completion of the Program activity. Individual project files may be retained in hard copy and/or digital format.
- 2. The City, in consultation with the SHPO and local preservation organizations, will work to develop disposition strategy for project files beyond the time period stated in Stipulation XVI.B.1 of this Agreement.

XVII. DISPUTE RESOLUTION

- A. If the SHPO objects to any plans for action proposed pursuant to this Agreement within thirty (30) calendar days, the City shall consult with the SHPO to resolve the objection. If the City determines that the objection cannot be resolved, the City shall forward all documentation relevant to the dispute to the ACHP. Within forty-five (45) calendar days following receipt of the documentation, the ACHP will either:
 - 1. Provide the City with recommendations, which the City will take into account in reaching a final decision regarding the dispute; or
 - 2. Notify the City that it will comment pursuant to this Agreement, and proceed to comment. Any ACHP comment provided in response to such a request will be taken into account by the City with reference to the subject of the dispute.
- B. The City shall consider the any recommendations or comments provided by the ACHP. The City remains responsible for carrying out all actions under this Agreement that are not the subject of the dispute.

XVIII. AMENDMENT

Any Party to this Agreement may notify the other Parties requesting that the Agreement be amended, whereupon all Parties to the Agreement will consult to consider such amendment. The amendment shall be effective on the date that a copy or copies of such amendment, signed by all of the signatories to this Agreement, is filed with the ACHP.

XIX. TERMINATION

Any signatory to this Agreement may terminate the Agreement by providing thirty (30) calendar days' written notice to all other signatories. During such notice period, the signatories will make reasonable effort to consult to determine if amendments or other actions could be taken to avoid termination. In the event of termination, the City will comply with 36 C.F.R. § 800.3 through 800.6 with regard to individual Undertakings covered by this Agreement.

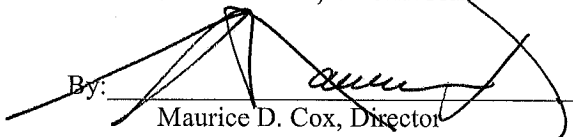
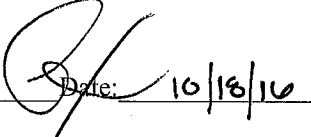
XX. EFFECTIVE DATE AND DURATION

This Agreement shall become effective on the date it is signed by all parties and shall continue in full force and effect until December 31, 2022 unless otherwise terminated or extended. Any extension shall constitute an amendment to the Agreement, and shall be adopted as such, in accordance with Stipulation XVIII of this Agreement.

Execution and implementation of this Agreement evidences that the City has afforded the ACHP a reasonable opportunity to comment on the Program and that the City has taken into account the effects of the Program on Historic Properties.

SIGNATORY PARTY:

CITY OF DETROIT, MICHIGAN

By:  Date: 
Maurice D. Cox, Director
Detroit Planning and Development Department

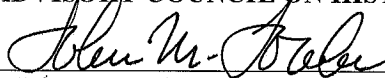
SIGNATORY PARTY:

MICHIGAN STATE HISTORIC PRESERVATION OFFICER

By: Brian D. Conway Date: 10/27/16
Brian D. Conway, SHPO

SIGNATORY PARTY:

THE ADVISORY COUNCIL ON HISTORIC PRESERVATION

By:  Date: 11/9/16
John M. Fowler, Executive Director

CONCURRING PARTY:

**KETEGITIGAANING OJIBWE NATION THPO / LAC VIEUX DESERT BAND OF LAKE
SUPERIOR CHIPPEWA INDIANS**

By: _____ Date: _____
Giiwegiizhigookway Martin, THPO

CONCURRING PARTY:

LITTLE RIVER BAND OF OTTAWA INDIANS

By: _____ Date: _____
Jonnie J. Sam, Director, Historic Preservation Department

CONCURRING PARTY:

POKAGON BAND OF POTAWATOMI INDIANS

By: _____ Date: _____
Jason S. Wesaw, THPO

CONCURRING PARTY:

SAULT STE. MARIE TRIBE OF CHIPPEWA INDIANS

By: _____ Date: _____
Colleen Medicine, Cultural Repatriation Specialist

CONCURRING PARTY:

LITTLE TRAVERSE BAY BANDS OF ODAWA INDIANS

By: _____ Date: _____
Wesley Andrews, THPO

CONCURRING PARTY:

THE DETROIT CITY COUNCIL

By: _____ Date: _____

Brenda Jones, President

CONCURRING PARTY:

CITY OF DETROIT, HOUSING & REVITALIZATION DEPARTMENT

By: _____ Date: _____
Arthur Jemison, Director

CONCURRING PARTY:

THE DETROIT LEGISLATIVE POLICY DIVISION/HISTORIC DESIGNATION ADVISORY BOARD

By: _____ Date: _____
Janese Chapman, Senior Historic Planner

CONCURRING PARTY:

NATIONAL TRUST FOR HISTORIC PRESERVATION

By: _____ Date: _____
Elizabeth Merritt, Deputy General Counsel

CONCURRING PARTY:

PRESERVATION DETROIT

By: _____ Date: _____
Amy Elliott Bragg, President

CONCURRING PARTY:

MICHIGAN HISTORIC PRESERVATION NETWORK

By: _____ Date: _____

Nancy Finegood, Executive Director

APPENDIX A

HUD PROGRAM SUMMARIES

(www.portal.hud.gov)

The following grant programs are authorized under this agreement, however additional HUD programs may be added at a later date. The summaries of each program were obtained from the HUD website.

Community Development Block Grant (CDBG) Program

Web Link:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/communitydevelopment/programs

About the Program

The CDBG program works to ensure decent affordable housing, to provide services to the most vulnerable in our communities, and to create jobs through the expansion and retention of businesses. CDBG is an important tool for helping local governments tackle serious challenges facing their communities. The CDBG program has made a difference in the lives of millions of people and their communities across the Nation.

The annual CDBG appropriation is allocated between States and local jurisdictions called "non-entitlement" and "entitlement" communities respectively. Entitlement communities are comprised of central cities of Metropolitan Statistical Areas (MSAs); metropolitan cities with populations of at least 50,000; and qualified urban counties with a population of 200,000 or more (excluding the populations of entitlement cities). States distribute CDBG funds to non-entitlement localities not qualified as entitlement communities.

HUD determines the amount of each grant by using a formula comprised of several measures of community need, including the extent of poverty, population, housing overcrowding, age of housing, and population growth lag in relationship to other metropolitan areas.

Citizen Participation

A grantee must develop and follow a detailed plan that provides for and encourages citizen participation. This integral process emphasizes participation by persons of low or moderate income, particularly residents of predominantly low- and moderate-income neighborhoods, slum or blighted areas, and areas in which the grantee proposes to use CDBG funds. The plan must provide citizens with the following: reasonable and timely access to local meetings; an opportunity to review proposed activities and program performance; provide for timely written answers to written complaints and grievances; and identify how the needs of non-English speaking residents will be met in the case of public hearings where a significant number of non-English speaking residents can be reasonably expected to participate.

Eligible Activities

Over a 1, 2, or 3-year period, as selected by the grantee, not less than 70 percent of CDBG funds must be used for activities that benefit low- and moderate-income persons. In addition, each activity must meet one of the following national objectives for the program: benefit low- and moderate-income persons, prevention or elimination of slums or blight, or address community development needs having a particular urgency

because existing conditions pose a serious and immediate threat to the health or welfare of the community for which other funding is not available.

Community Development Block Grant – Declared Disaster Recovery (CDBG-DDR) Program

This funding is intended to reduce weaknesses in Detroit’s aging storm water management system that contributed to the 2014 Flood. Proposed projects can establish more resilient, cost effective, and innovative infrastructure systems. These proposed projects are at varying developmental stages. These projects are designed to enhance quality of life by using natural systems to:

1. Manage storm water and reduce flooding
2. Spur economic development and neighborhood vitality
3. Decrease blight through vacant land use and strategic demolition

Proposed projects include the following:

- *Selective demolition, green infrastructure installation, and vacant lot treatment.*
The two areas targeted for this activity are “Aviation Sub” and “Islandview.” Activities would include demolition followed by site treatments that perform green infrastructure function by helping to manage stormwater. Additional vacant parcels will receive landscaping improvements to improve stormwater retention and reduce blight.
- *Westside Green Infrastructure Projects and Planning*
This project area includes the Upper Rouge Sewershed and is a focus of the National Pollutant Discharge Elimination System permit. Green infrastructure here will help meet the City’s combined sewer overflow reduction requirements, with an additional goal of preventing future basement backup flooding and improving neighborhood quality of life. An assessment of ongoing work and coordinated planning will be performed. Areas included in the westside projects and planning area include Rouge Park, Brightmoor, Grandmont-Rosedale, Cody Rouge, Aviation Sub., and others.
- *Eastside Green Infrastructure Projects and Planning*
This project area includes the Near Eastside Drainage District which is a priority area in which to create green infrastructure due to its impact on stormwater management. Green infrastructure here will help meet the City’s combined sewer overflow reduction requirements, with an additional goal of preventing future basement backup flooding and improving neighborhood quality of life. Potential renewable energy projects as a way to improve resiliency and reduce water system costs will be explored. An assessment of ongoing work and coordinated planning will be performed. Areas included in the eastside projects and planning area include McDougall Hunt, Islandview, West Village, Indian Village, and others.

CDBG - Disaster Recovery (CDBG-DR) Assistance Program

Web Link:

<https://www.hudexchange.info/programs/cdbg-dr/>

HUD provides flexible grants to help cities, counties, parishes, and states recover from presidentially declared disasters, especially in low- and moderate-income areas. HUD publishes allocations and program

requirements in notices in the Federal Register. Generally, CDBG requirements apply unless modified by appropriations statute, waived, or supplanted by alternative requirements. CDBG Disaster Recovery Assistance is also subject to requirements of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act).

When major disasters occur, Congress may appropriate additional funding for the CDBG program as Disaster Recovery grants to rebuild the affected areas and bring crucial seed money to stimulate the recovery process. Because CDBG funds a broad range of activities, CDBG Disaster Recovery assistance helps communities and neighborhoods that otherwise might not recover due to limits on other resources. Disaster Recovery grants supplement disaster programs of the Federal Emergency Management Agency (FEMA), the Small Business Administration, and the U.S. Army Corps of Engineers.

Self-Help Homeownership Opportunity Program (SHOP)

Web Link:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/affordablehousing/programs/shop

SHOP authorizes HUD to make competitive grants to national and regional nonprofit organizations and consortia that have experience in providing or facilitating self-help housing opportunities. Grants are to be used by the grantee or its affiliates for eligible expenses in connection with developing non-luxury housing for low-income families and persons who otherwise would be unable to purchase a house. Eligible expenses for grants are limited to land acquisition (including financing and closing costs), infrastructure improvements (installing, extending, constructing, rehabilitating, or otherwise improving utilities and other infrastructure), and administrative costs (up to 20 percent of the grant amount). Homebuyers must contribute a significant amount of sweat equity toward the construction of their homes. SHOP also requires community participation through volunteers who assist the homebuyers on the construction of the homes. Assisted units must be decent, safe, and sanitary non-luxury dwellings that comply with local building and safety codes and standards. These units must be sold to eligible low-income homebuyers at prices below the prevailing market price.

Housing Opportunities for Persons With AIDS (HOPWA)

Web Link:

<https://www.hudexchange.info/programs/hopwa/>

To address housing needs for low-income persons who are living with HIV/AIDS and their families, the Office of HIV/AIDS housing manages the Housing Opportunities for Persons With AIDS (HOPWA) program.

The HOPWA program is the only Federal program dedicated to addressing the housing needs of persons living with HIV/AIDS and their families. Grantees partner with nonprofit organizations and housing agencies to provide housing and support to these beneficiaries.

HOPWA funds are awarded as grants from two programs:

- For the HOPWA Competitive Program priority is given to the renewal of expiring permanent supportive housing grants.

- The HOPWA Formula Program uses a statutory method to allocate HOPWA funds to eligible States and cities on behalf of their metropolitan areas.

HOME Program

Web Link:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/affordablehousing/programs/home/

The HOME Investment Partnerships Program (HOME) provides formula grants to States and localities that communities use - often in partnership with local nonprofit groups - to fund a wide range of activities including building, buying, and/or rehabilitating affordable housing for rent or homeownership or providing direct rental assistance to low-income people. HOME is the largest Federal block grant to state and local governments designed exclusively to create affordable housing for low-income households.

HOME funds are awarded annually as formula grants to participating jurisdictions (PJs). The program's flexibility allows States and local governments to use HOME funds for grants, direct loans, loan guarantees or other forms of credit enhancements, or rental assistance or security deposits.

Participating jurisdictions may choose among a broad range of eligible activities, using HOME funds to provide home purchase or rehabilitation financing assistance to eligible homeowners and new homebuyers; build or rehabilitate housing for rent or ownership; or for "other reasonable and necessary expenses related to the development of non-luxury housing," including site acquisition or improvement, demolition of dilapidated housing to make way for HOME-assisted development, and payment of relocation expenses.

Lead Hazard Reduction Demonstration Grant (LHRDG) Program

Web Link:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/healthy_homes/lbp/lhc

The purpose of the Lead-Based Paint Hazard Control (LHC) and the Lead Hazard Reduction (LHRD) grant programs is to identify and control lead-based paint hazards in eligible privately owned housing for rental or owner-occupants. The Lead-Based Paint Hazard Control Grant program is the largest program in terms of dollar amount and number of grants.

Special Purpose Grants

Web Link:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/economicdevelopment/programs/congressional/special

Congressional Grants are authorized each year in the annual HUD appropriation and accompanying conference report or congressional record. Congress authorizes a specific level of funding to a designated grantee, to undertake a particular activity cited in the appropriation or conference report. Only those entities designated by Congress may apply for funds. Unsolicited applications are not accepted.

Emergency Shelter Grant (ESG) Program

Provides grants by formula to States, metropolitan cities, urban counties and U.S. territories for eligible activities, generally including essential services related to emergency shelter, rehabilitation and conversion of buildings to be used as emergency shelters, operation of emergency shelters, and homelessness prevention services.

Public and Indian Housing (PIH) Program

The Office of Public and Indian Housing (PIH) is responsible for administering and managing a number of programs designed to ensure safe and affordable housing for 1.3 million households nationwide. PIH also works with public housing authorities across the country to help them improve their management and service delivery efforts. The five offices of PIH are:

Office of Native American Programs (ONAP) is responsible for improving housing conditions for Native American families. The office also creates economic opportunities for tribes and Indian housing residents and assists tribes with community development initiatives. The office oversees Code Talk, a federal, interagency web site designed to deliver electronic information from government agencies and other organizations to Native American communities.

The Office of Community Relations and Involvement deals individually with low-income housing communities on the state and local levels.

The Office of Public and Assisted Housing Operations helps to offer and maintain affordable housing options for low-income families by offering vouchers that can be exchanged for rental payments.

The Office of Public Housing Investments oversees outreach and investment opportunities in low-income housing developments. This office also looks for sites to demolish.

The Office of Policy, Program and Legislative Initiatives is responsible for helping create the agency's policy and oversees implementation of any new laws or amendments to existing housing laws.

Neighborhood Stabilization Program (NSP1 & NSP3)

Web Link:

<https://www.hudexchange.info/programs/nsp/>

NSP was established for the purpose of providing emergency assistance to stabilize communities with high rates of abandoned and foreclosed homes, and to assist households whose annual incomes are up to 120 percent of the area median income (AMI).

NSP funds may be used for activities which include, but are not limited to:

- Establish financing mechanisms for purchase and redevelopment of foreclosed homes and residential properties;
- Purchase and rehabilitate homes and residential properties abandoned or foreclosed;
- Establish land banks for foreclosed homes;

- Demolish blighted structures;
- Redevelop demolished or vacant properties

In addition, the use of NSP funds must also meet one of the following CDBG national objectives:

- Housing Activities: Providing or improving permanent residential structures that will be occupied by a household whose income is at or below 120% of area median income.
- Area Benefit Activities: Benefiting all the residents of a primarily residential area in which at least 51% of the residents have incomes at or below 120% of area median income.
- Limited Clientele Activities: Serving a limited clientele whose incomes are at or below 120% of area median income.

NSP grantees develop their own programs and funding priorities. However, grantees must use at least 25% of the funds appropriated to house individuals or families whose incomes do not exceed 50% of the area median income. Activities may not qualify under NSP using the CDBG "prevent or eliminate slums and blight" or "address urgent community development needs" national objectives.

APPENDIX B

DEFINITIONS AND ABBREVIATIONS

ACHP means the Advisory Council on Historic Preservation, an independent Federal agency that advises the President and Congress on historic preservation matters.

Adverse Effect means the altering of a property in a manner that would diminish its integrity or alter the characteristics that qualify the property for inclusion in the National Register of Historic Places.

Area of Potential Effect, as defined in 36 C.F.R. § 800.16(d), means the geographic area or areas within which an Undertaking may directly or indirectly cause alterations in the character or use of Historic Properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.

CDBG means Community Development Block Grant.

Commercial Buildings means any structure with a commercial, industrial, or residential use that has more than four (4) housing units.

Consultation means the process of seeking, discussing, and considering the views of other participants, and, where feasible, seeking agreement with them regarding matters arising in the section 106 process.

Dangerous Building means such buildings as defined by City of Detroit Ordinance 290-H and deemed by the City of Detroit Department of Buildings and Safety Engineering.

DBA means the Detroit Building Authority.

HDAB means the City of Detroit Historic Designation Advisory Board.

Historic Property means any property that is included in or eligible for inclusion in the National Register of Historic Places as set forth in 36 CFR § 800.

HOME means HOME Investment Partnerships Program.

HUD means the United States Department of Housing and Urban Development.

Indian Tribe means an Indian tribe, band, nation, or other organized group or community, including a native village, regional corporation or village corporation, as those terms are defined in Section 3 of the Alaska Native Claims Settlement Act (43 U.S.C. § 1602), which is recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians.

Memorandum of Agreement (MOA) means the document that records the terms and conditions agreed upon to resolve the adverse effects of an undertaking upon historic properties.

National Register of Historic Places (NRHP) refers to the official inventory of historic resources in the United States, authorized by the National Historic Preservation Act of 1966 and maintained by the Secretary of the Interior.

PDD means the City of Detroit Planning and Development Department.

Preservation Specialist means the City employee or consultant who meets the professional qualifications in architectural history, historic architecture or related fields, as specified in the Secretary of the Interior's Professional Qualification Standards, as set forth in 36 CFR Part 61.

Program refers to the City of Detroit's program to administer all Undertakings funded by HUD specifically covered by this Programmatic Agreement and administered by the City of Detroit Planning and Development Department.

Residential Buildings means any structure with a residential use that has four (4) or fewer housing units.

Section 106 refers to Section 106 of the National Historic Preservation Act of 1966 and its resulting review process designed to ensure that impacts on historic properties are taken into account during Federal project planning and execution.

SHPO means the Michigan State Historic Preservation Officer.

Standards means the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings, contained in 36 CFR Part 67.

Tribal Lands means all lands within the exterior boundaries of any Indian reservation and all dependent Indian communities.

Undertaking means a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license or approval.

APPENDIX C

PROGRAMMATIC EXEMPTIONS

The following project activities, which have limited potential to affect Historic Properties and do not require further review from the SHPO when the undertakings are limited solely to these activities:

A. Site Improvements

1. Reconstruction of roads where no change in width, surface materials, surface treatments, or vertical alignments of drainage is to occur.
2. Repair/replacement of existing curbs and sidewalks with identical materials within existing dimensions.
3. Repair/replacement of water, gas, storm, and/or sewer lines if it occurs within the dimensions of the original trench and permanent impacts upon surface treatments or landscape features which contribute to the historic or architectural significance of the resource are avoided.
4. Tree plantings adjacent to right-of-way.
5. Repainting parking spaces or streets.

B. Interior Rehabilitation

The following may proceed without review if permanent impacts upon interior elements or surface treatments that contribute to the historic or architectural significance of the buildings are avoided.

1. All plumbing rehab/replacement - includes pipes and fixtures.
2. Heating, Venting, and Air-conditioning Systems – rehab, replacement, cleaning provided that no new venting or new venting locations are required. If new venting is required, it shall be located on the rear of the structure and shall not be visible from the public right-of-way.
3. Electrical work.
4. Restroom improvements for handicapped access - provided that work is contained within the existing restroom.
5. Interior surface treatments (floors, walls, ceilings, and woodwork) provided the work is restricted to repainting, refinishing, re-papering, or laying carpet or linoleum and the feature is not significant to the integrity of the property.
6. Installation of insulation provided it is restricted to attics and crawl spaces, upper surfaces of existing ceilings and the ceilings are not dropped, and proper vapor barriers are used. Also, wall insulation should not be installed in historic frame buildings unless an adequate vapor barrier can be added to the interior face of the wall. Insulation must be kept dry to function properly, and therefore requires a vapor barrier and some provision for air movement. Introducing insulation in wall cavities without a vapor barrier and some ventilation can lead to problems such as paint failure or the deterioration of wood members.
7. Repair of or pouring of concrete cellar floor.
8. Installation of new kitchen and bath appliances, cabinets, counters, tubs, sinks and toilets.
9. Repair or replacement of concrete basement floors and interior basement walls.
10. Replacement of door locks.

C. Exterior Rehabilitation

1. Caulking, weather stripping and replacement of window glass with glass of the same surface qualities (color, texture, and reflectivity).
2. Installation or replacement of gutters and downspouts (if the color is historically appropriate for the period and style of the historic resource).
3. Flat or shallow pitch roof repair/replacement (shallow pitch is understood to have a rise-to-run ratio equal to or less than 3 inches to 12 inches), with no part of the surface of the roof visible from the ground.
4. New storm windows - provided they conform to shape and size of historic windows and that the meeting rail coincides with that of the existing sash. Color should match trim; mill finish aluminum is not acceptable. Repair or repainting of existing storm windows.
5. In-kind replacement - this is understood to mean that the new features/items will duplicate the material, dimensions, configuration and detailing of the original of the following:
 - a. Porches - railings, posts/columns, brackets, cornices, steps, flooring
 - b. Roofs
 - c. Siding
 - d. Exterior architectural details and features
 - e. Windows - this understood to include both the frame, panes and sash
 - f. Doors
 - g. Cellar/bulkhead doors
6. Painting previously painted surfaces in color(s) historically appropriate for the period and style of the historic resource.
7. Repair of existing wheelchair ramps.
8. Repair, replace, or install new sidewalks or driveways that match the existing sidewalk or driveway in materials and dimensions.
9. Repair or replacement of chimneys with the same material and dimensions.

APPENDIX D

TREATMENT OF HISTORIC PROPERTIES FOR DEMOLITION

The City shall forward documentation to the SHPO for review and comment regarding the proposed demolition of any Historic Property. The form of documentation to be provided to the SHPO will vary depending on the demolition classification as well as building type (Residential or Commercial) and whether it is a single resource or contributes to a district. The guidelines for each submittal are delineated below.

A. Demolition of Vacant and Dangerous Buildings. The City shall forward adequate documentation to the SHPO for review and comment regarding the proposed demolition of a Historic Property under the Vacant and Dangerous Buildings program. Documentation for this category of demolition shall include, at a minimum, the following:

1. Photographs of all elevations and significant features;
2. An explanation of how long the property has been listed on the City's Vacant and Dangerous Buildings list and why demolition is proposed;
3. A structural report by a licensed Structural Engineer with experience with historic building structural systems or a licensed architect meeting the Qualification Standards;
4. A summary of alternatives to demolition that were considered and why they were not used;
5. Copies or summaries of any views provided by consulting parties and the public. Sources may include written or recorded public comment, letters and/or email correspondence; and
6. Proposed mitigation measure(s) selected from Appendix F which shall be forwarded to the SHPO in a "two-party" Memorandum of Agreement (MOA).

Depending on the building type and whether it is a single Historic Property or contributes to a historic district, the following additional pieces of information are also required to be provided to the SHPO for review:

1. **Residential Buildings - Individual.**
 - a. Photographs of the property including interior views (if City-owned), photographs showing details of any character-defining features, and historic photographs, if available; and,
 - b. A completed SHPO inventory card, including a brief history of the property including a statement of the historic and/or architectural significance of the resource meeting the criteria for listing in the NRHP.
2. **Residential Buildings - within a District.**
 - a. Photographs including representative streetscape views showing the surrounding built environment. These photos shall be keyed to a localized map.

- b. A completed SHPO inventory card, including brief history of the district including a statement of the historic and/or architectural significance of the district meeting the criteria for listing in the NRHP.

3. Commercial Buildings - Individual.

- a. Photographs of the property including interior views, photographs showing details of any character-defining features, and historic photographs, if available;
- b. A completed SHPO inventory card, with a brief history of the property including a statement of the historic and/or architectural significance of the resource meeting the criteria for listing in the NRHP; and,
- c. Mapping showing land and building vacancies within 1,500 feet of the property.

4. Commercial Buildings - within a District.

- a. Photographs shall include representative streetscape views showing the surrounding built environment. These photos shall be keyed to a localized map.
- b. A completed SHPO inventory card, with a brief history of the district including a statement of the historic and/or architectural significance of the district meeting the criteria for listing in the NRHP; and,
- c. Mapping showing land and building vacancies within 1,500 feet of the property.

Within thirty (30) calendar days following receipt of adequate documentation, if the SHPO agrees with the proposed demolition of a Historic Property, it shall sign the "two-party" MOA and return it to the City for signature. If the SHPO objects to the proposed demolition, the City and the SHPO shall consult per Stipulation XVII of this Agreement.

B. Routine Demolition Projects. Prior to the demolition of a Historic Property not covered under the Vacant and Dangerous Buildings program, the City shall forward adequate documentation to the SHPO for review and comment. This documentation shall include, at a minimum, the following:

- 1. Photographs of all elevations and significant features;
- 2. A structural report by a licensed Structural Engineer with experience with historic building structural systems or a licensed architect meeting the "Qualification Standards";
- 3. A summary of alternatives to demolition that were considered and why they were not used;
- 4. Copies or summaries of any views provided by consulting parties and the public. Sources may include written or recorded public comment, letters and/or email correspondence; and
- 5. Proposed mitigation measure(s) selected from Appendix F which shall be forwarded to the SHPO in a "two-party" Memorandum of Agreement (MOA).

Depending on the building type and whether it is a single Historic Property or contributes to a historic district, the following additional pieces of information are also required to be provided to the SHPO for review:

1. Residential Buildings - Individual.

- a. Photographs of the property including interior views (if City-owned), photographs showing details of any character-defining features, and historic photographs, if available; and,
- b. A completed SHPO inventory card, with a brief history of the property including a statement of the historic and/or architectural significance of the resource meeting the criteria for listing in the NRHP.

2. Residential Buildings - within a District.

- a. Photographs including representative streetscape views showing the surrounding built environment. These photos shall be keyed to a localized map; and,
- b. A brief history of the district including a statement of the historic and/or architectural significance of the district meeting the criteria for listing in the NRHP.

3. Commercial Buildings - Individual.

- a. Photographs of the property including interior views, photographs showing details of any character-defining features, and historic photographs, if available;
- b. A completed SHPO inventory card, with a brief history of the property including a statement of the historic and/or architectural significance of the resource meeting the criteria for listing in the NRHP; and,
- c. Mapping showing land and building vacancies within 1,500 feet of the property.

4. Commercial Buildings - within a District.

- a. Photographs shall include representative streetscape views showing the surrounding built environment. These photos shall be keyed to a localized map;
- b. A completed SHPO inventory card, with a brief history of the district including a statement of the historic and/or architectural significance of the district meeting the criteria for listing in the NRHP; and
- c. Mapping showing land and building vacancies within 1,500 feet of the property.

Within thirty (30) calendar days following receipt of adequate documentation, if the SHPO agrees with the proposed demolition of a Historic Property, it shall sign the "two-party" MOA and return it to the City for signature. If the SHPO objects to the proposed demolition, the City and the SHPO shall consult per Stipulation XVII of this Agreement.

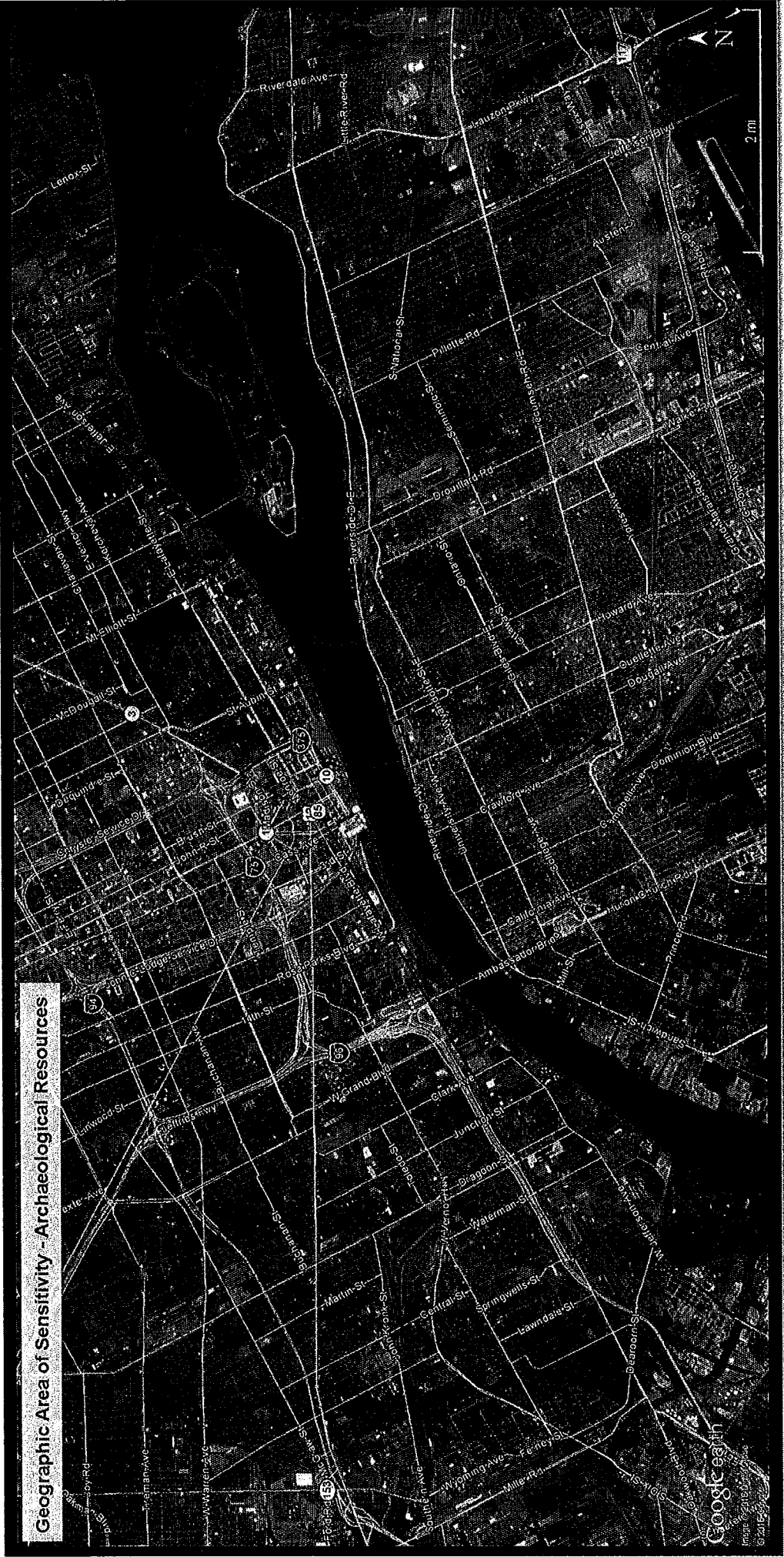
C. Emergency Demolitions Funded by the Program

1. When the City determines that the emergency demolition of Historic Properties, including any property type, is required to comply with Detroit City Ordinance No. 290-H to avoid an imminent threat to the health and safety of residents, and Program funds are used for the demolition, the City shall forward documentation to the SHPO via electronic mail and express mail with a request for comments within three (3) business days. Documentation shall include:
 - a. The address of the property and the nature of the emergency;
 - b. At least two (2) recent photographs of the property;
 - c. A signed copy of the local order requiring that emergency demolition commence within 30 days or less; and
 - d. A SHPO inventory card or other documentation regarding the National Register eligibility of the property.
2. The SHPO will notify the City in writing whether it approves the emergency demolition and what, if any, mitigation measures must be implemented prior to demolition (i.e., recordation, architectural salvage, etc.). The City shall ensure that, to the extent feasible, all mitigation measures are implemented and appropriate documentation forwarded to the SHPO within fourteen (14) business days following the completion of demolition activities.
3. If the SHPO objects to the emergency demolition, the City and the SHPO shall consult per Stipulation XVII of this Agreement.

APPENDIX E

GEOGRAPHIC AREA OF SENSITIVITY ARCHEAOLOGICAL RESOURCES

The City, in consultation with the SHPO's archaeologist, have delineated on the attached map a geographic area of sensitivity for archaeological resources. This area is roughly bounded by the Detroit River to the south, the River Rouge to the west, W. Jefferson Street, W. Fort Street and E. Jefferson Street to the north, and Alter Road to the east.



Geographic Area of Sensitivity - Archaeological Resources

APPENDIX F

MITIGATION MEASURES

If an Undertaking results or will result in one or more adverse effects, the City and SHPO shall develop a treatment measure plan that includes one or more of the following Mitigation Measures, depending on the nature of the Historic Properties affected and the severity of the adverse effects.

A. Recordation Package

1. Digital Photography Package: Prior to project implementation, the City shall oversee the successful delivery of a Digital Photography Package prepared by the Preservation Specialist or contractors having professional qualifications in *Architectural History*, *Historic Architecture*, or related fields in accordance with the Secretary of the Interior's Professional Qualification Standards, 36 C.F.R. Part 61, as published at 48 FR 44716 (1983) ("Qualification Standards"). The Digital Photography Package will meet the standards cited in the National Park Service's *National Register of Historic Places Photographic Policy March 2010* or subsequent revisions (<http://www.nps.gov/nr/publications/bulletins/photopolicy/index.htm>).
 - a. The Digital Photography Package shall include a comprehensive collection of photographs of both interior and exterior views showing representative spaces and details of significant architectural features and typical building materials. Exterior photographs shall include full oblique and contextual images of each elevation. Exterior views shall be keyed to a site plan while interior views shall be keyed to a floor plan of the building/structure. The photographs shall be indexed according to the date photographed, site number, site name, site address, direction, frame number, subject matter and photographer's name recorded on the reverse side in pencil.
 - b. The Digital Photography Package shall include one (1) full set of printed color copies of the digital photographs (on appropriate paper, per NPS Photographic Policy), a CD/DVD of the digital photographs, a completed SHPO inventory form, and a written site history of the Historic Property.
 - c. The City shall submit the Digital Photography Package to the SHPO for review and approval. Once approved by the SHPO, the City shall submit full copies of the approved Digital Photography Package to Burton Historical Collection of the Detroit Public Library for permanent retention.
2. 35 mm Black and White Film Photography Package: Prior to project implementation, the designated City shall oversee the successful delivery of a 35 mm Black and White Film Photography Package prepared by the Preservation Specialist or contractors that meet the "Qualification Standards."
 - a. The 35 mm Black and White Film Photography Package shall include a comprehensive collection of photographs of both interior and exterior views showing representative spaces and details of significant architectural features and typical building materials. Exterior photographs shall include full oblique and contextual images of each elevation. Exterior views shall be keyed to a site plan while interior views shall be keyed to a floor plan of the building/structure. The

- photographs shall be indexed according to the date photographed, site number, site name, site address, direction, frame number, subject matter and photographer's name recorded on the reverse side in pencil.
- b. The 35 mm Black and White Film Photography Package shall include one (1) full set of 35mm film black and white photographs printed on acid free paper, the corresponding 35mm film negatives in acid free sleeves, a completed SHPO inventory form, and a written site history of the Historic Property.
 - c. The City shall submit the 35 mm Black and White Film Photography Package to the SHPO for review and approval. Once approved by the SHPO, the City shall submit full copies of the approved 35 mm Black and White Film Photography Package to Burton Historical Collection of the Detroit Public Library for permanent retention.
3. Large Format Film Photography Package: Prior to project implementation, the designated City shall oversee the successful delivery of a Large Format Film Photography Package prepared by the Preservation Specialist or contractors that meet the "Qualification Standards."
- a. The Large Format Film Photography Package shall include a comprehensive collection of photographs of both interior and exterior views showing representative spaces and details of significant architectural features and typical building materials. Exterior photographs shall include full oblique and contextual images of each elevation. Exterior views shall be keyed to a site plan while interior views shall be keyed to a floor plan of the building/structure. The photographs shall be indexed according to the date photographed, site number, site name, site address, direction, frame number, subject matter and photographer's name recorded on the reverse side in pencil.
 - b. The Large Format Film Photography Package shall include one (1) full set of 4 x 5 or 5 x 7-inch photographs printed on acid free paper, the corresponding 4 x 5 or 5 x 7-inch negatives in acid free sleeves, a completed SHPO inventory form, and a written site history of the Historic Property.
 - c. The City shall submit the Large Format Film Photography Package to the SHPO for review and approval. Once approved by the SHPO, the City shall submit full copies of the approved 35 mm Black and White Film Photography Package to Burton Historical Collection of the Detroit Public Library for permanent retention.

B. Rehabilitation of Historic Properties

Prior to project implementation, the City shall consult with the SHPO to identify individual properties within the historic district that would benefit from a renovation and rehabilitation. Once the parties have agreed to a property or properties, the City shall continue to coordinate with the SHPO through the drafting project plans and specifications. The City shall use the Preservation Specialist or contractors that meet the "Qualification Standards" to provide guidance regarding the development of these plans. All work shall follow the "Secretary of the Interior Standards for Rehabilitation."

C. Design Review by SHPO

Prior to project implementation, City shall consult with the SHPO to develop a historically compatible design. Plans and specifications will, to the greatest extent feasible, preserve the basic character of a building. Primary emphasis shall be given to the major street elevations that are visible. Significant contributing features (e.g. trim, windows, doors, porches) will be repaired or replaced with either in-kind materials or materials that come as close as possible to the original materials in basic appearance. Aesthetic camouflaging treatments such as use of veneers, paints, texture compounds and other surface treatments and/or use of sympathetic infill panels and landscaping features will be employed to the greatest extent feasible. Final construction drawings used in the bidding process will be submitted to the SHPO for review and comment prior to the award of a construction contract and the initiation of construction activities. No photography of Native American human remains or funerary objects will be allowed.

D. Tribal Treatment Plan

The City shall consult with the participating Tribes to develop a plan for the protection and treatment of, including but not limited to, Native American remains, funerary objects, cultural and religious landscapes, ceremonial items, traditional gathering areas and cultural items, for known sites and in the event that any are discovered in conjunction with the Undertaking, including archaeological studies, excavation, geotechnical investigations, grading, and all ground-disturbing activity. The plan will also formalize procedures for Tribal monitoring during archaeological studies, grading, and ground disturbing activities for the Undertaking.

E. Architectural Salvage

The City shall consult with the SHPO to determine whether the property contains significant architectural features that could be reused, displayed, interpreted, or curated. If such features exist, the City in consultation with the SHPO, and the property owner, will develop measures to ensure that the selected features are removed in such a manner that minimizes damage and are delivered to an appropriate party for curation and reuse.

F. Public Interpretation

Prior to project implementation, the City shall consult with the SHPO to design an educational interpretive plan. The plan may include historical markers, plaques, signs, displays, educational pamphlets, websites, workshops and other similar mechanisms to educate the public on historic properties within the local community, state, or region. Once an interpretive plan has been agreed to by the parties, SHPO, participating Tribes, and the City will continue to consult throughout implementation of the plan until all agreed upon actions have been completed by the City.

G. Historical Context Statements and Narratives

Prior to project implementation, the City shall consult with the SHPO to determine the topic and framework of a historic context statement or narrative the City shall be responsible for completing. The statement or narrative may focus on an individual property, a historic district, a set of related properties, or relevant themes as identified in the statewide preservation plan. Once the topic of the

historic context statement or narrative has been agreed to, the City shall continue to coordinate with the SHPO through the drafting of the document and delivery of a final product. The SHPO shall have final approval over the end product. The City shall use the Preservation Specialist or contractors that meet the “Qualification Standards.”

H. Oral History Documentation

Prior to project implementation, the City shall consult with the SHPO to identify oral history documentation needs and agree upon a topic and list of interview candidates. Once the parameters of the oral history project have been agreed upon, the City shall continue to coordinate with the SHPO through the data collection, drafting of the document, and delivery of a final product. The SHPO shall have final approval over the end product. The SHPO shall have final approval over the end product. The City shall use the Preservation Specialist or contractors that meet the “Qualification Standards.”

I. Historic Property Inventory

Prior to project implementation, the City shall consult with the SHPO to establish the appropriate level of effort to accomplish a Historic Property inventory or synthesis of archeological data. Efforts may be directed toward the resurvey of previously designated historic properties and/or districts which have undergone change or lack sufficient documentation, or the survey of new Historic Properties and/or districts that lack formal designation. Once the boundaries of the survey area have been agreed upon, the City shall continue to coordinate with the SHPO through the data collection process. The City will use SHPO standards for the survey of Historic Properties and SHPO forms as appropriate. The City will prepare a draft inventory report, according to SHPO templates and guidelines, and consult with the SHPO until a final property inventory is approved. The City shall use the Preservation Specialist or contractors that meet the “Qualification Standards.”

J. National Register and National Historic Landmark Nominations

Prior to project implementation, the City shall consult with the SHPO, to identify the individual properties that would benefit from a completed National Register or National Historic Landmark nomination form. Once the parties have agreed to a property, the City shall continue to coordinate with the SHPO through the drafting of the nomination form. The SHPO will provide adequate guidance to the City during the preparation of the nomination form and shall formally submit the final nomination to the Keeper for inclusion in the National Register of Historic Places. The City shall use the Preservation Specialist or contractors that meet the “Qualification Standards.”

K. Local Historic District Designation

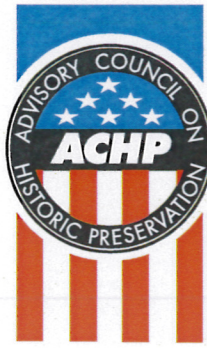
Prior to project implementation, the City shall consult with the SHPO, to assist local interested citizen organization(s) in pursuing local historic district designation of a particular building or district. Once the parties have agreed to a property or properties, the City shall continue to coordinate with the SHPO through the drafting of the designation report. The City shall use HDAB staff that meet the “Qualification Standards.”

L. Geo-References of Historic Maps and Aerial Photographs

Prior to project implementation, the City shall consult with the SHPO to identify the historic maps and/or aerial photographs for scanning and geo-referencing. Once a list of maps and/or aerial photographs have been agreed upon, the City shall continue to coordinate with the SHPO through the scanning and geo-referencing process and shall submit drafts of paper maps and electronic files to them for review. The SHPO shall have final approval on the quality of the documentation provided by the City. The final deliverable shall include a paper copy of each scanned image, a geo-referenced copy of each scanned image, and the metadata relating to both the original creation of the paper maps and the digitization process.

M. Research and Data Recovery Plans for Archaeological Resources

Prior to project implementation, the City shall consult with the SHPO to develop research and data recovery plans for significant archaeological sites.



Preserving America's Heritage

November 8, 2016

Mr. Maurice Cox
Director
Planning and Development Department
2 Woodward Ave, Suite 808
Detroit, MI 48226

Ref: *Programmatic Agreement for HUD-Funded Programs
City of Detroit, Wayne County, Michigan*

Dear Mr. Cox:

Enclosed are two copies of the fully executed referenced Programmatic Agreement. By carrying out the terms of the agreement, you will fulfill your responsibilities under Section 106 of the National Historic Preservation Act and the regulations of the Advisory Council on Historic Preservation, "Protection of Historic Properties" (36 CFR Part 800). An original agreement will remain on file at our office.

We commend the City of Detroit for working closely with the Michigan State Historic Preservation Officer and others toward the consideration of historic properties in these programs. Thank you for your diligence.

If we may be of further assistance as the agreement is implemented, please contact Ms. Jaime Loichinger (202) 517- 0219, or via e-mail at jloichinger@achp.gov.

Sincerely,

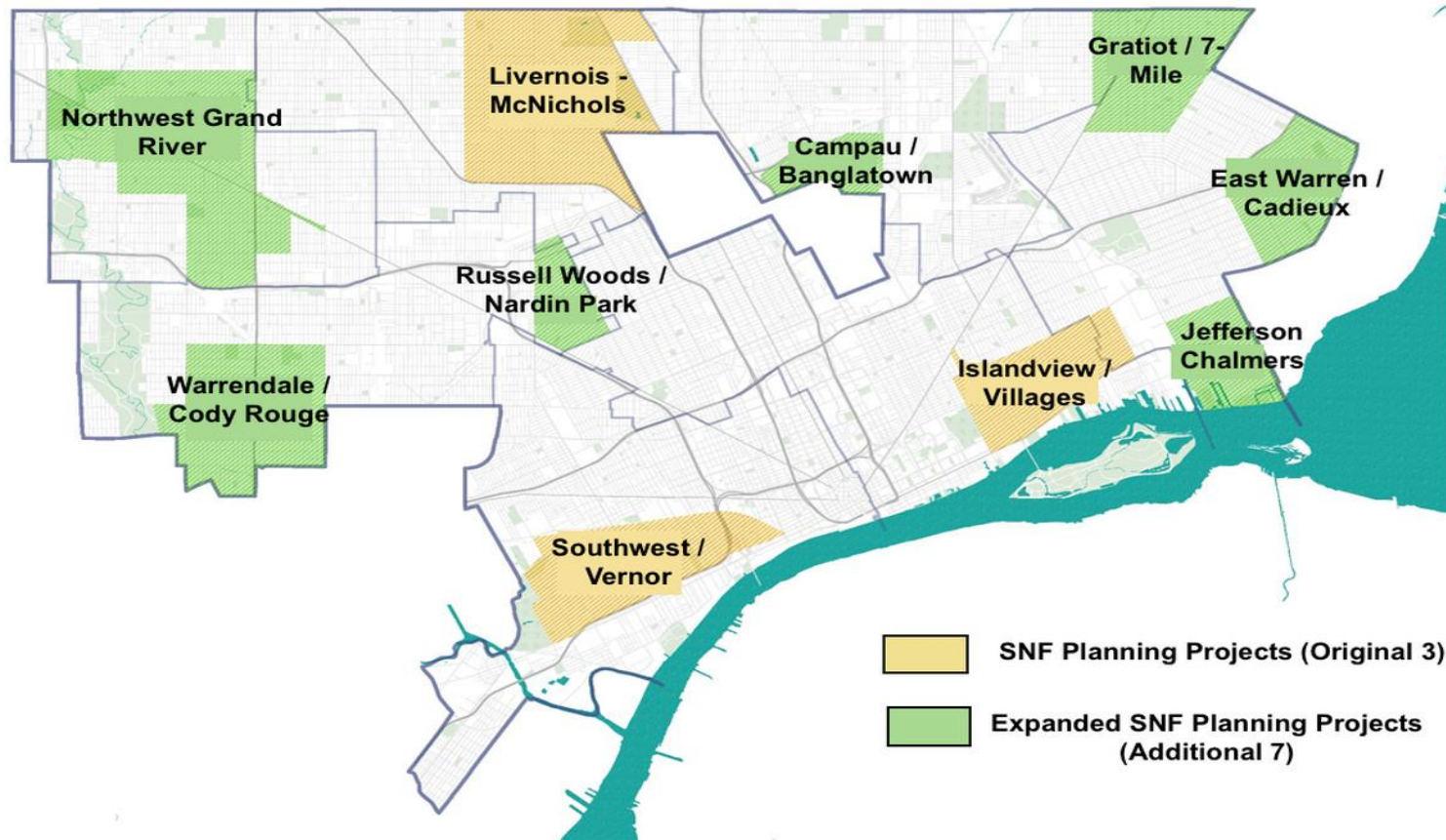
Charlene Dwin Vaughn, AICP
Assistant Director
Office of Federal Agency Programs
Federal Permitting, Licensing, and Assistance Section

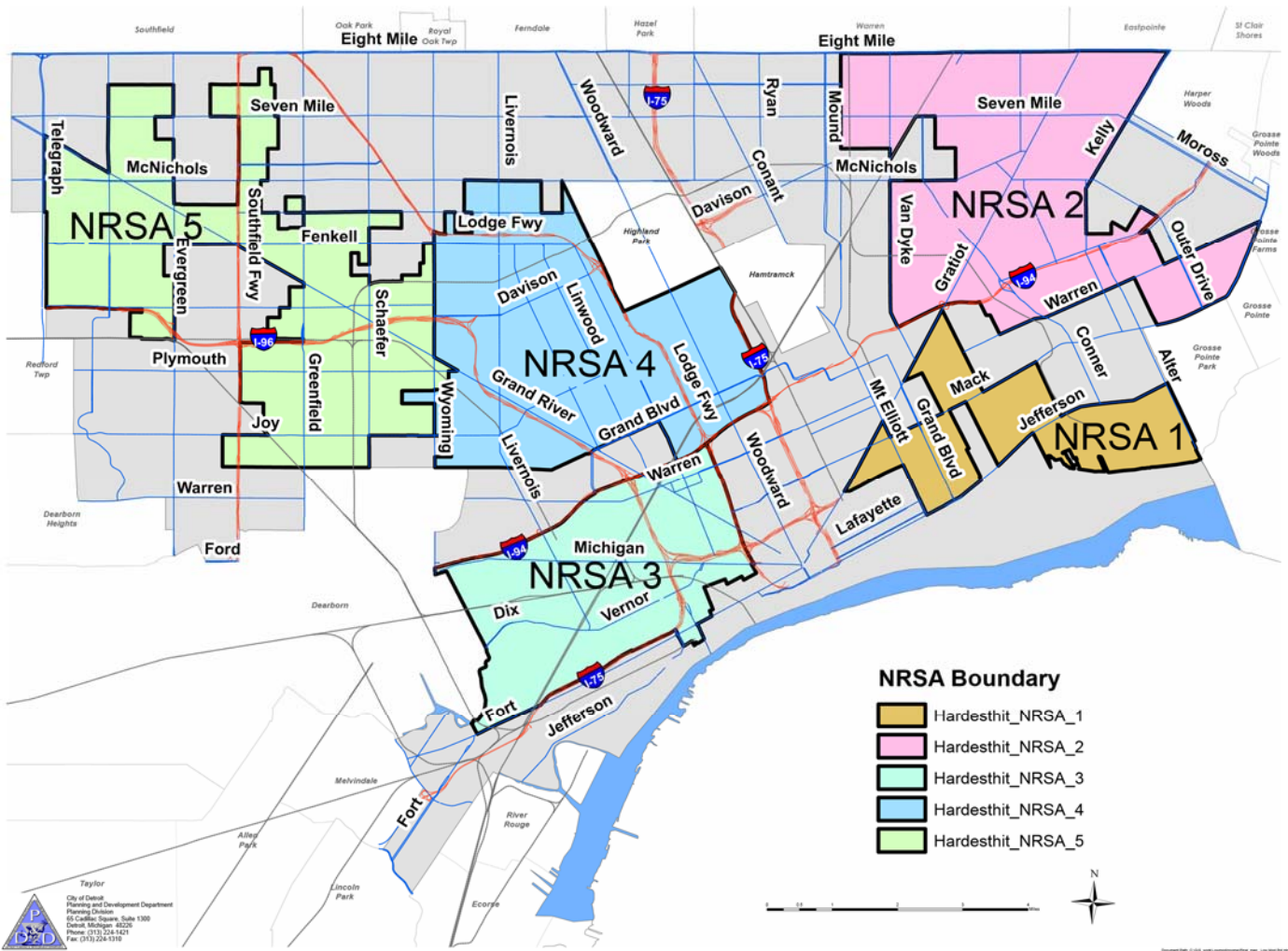
Enclosures

MAPS:

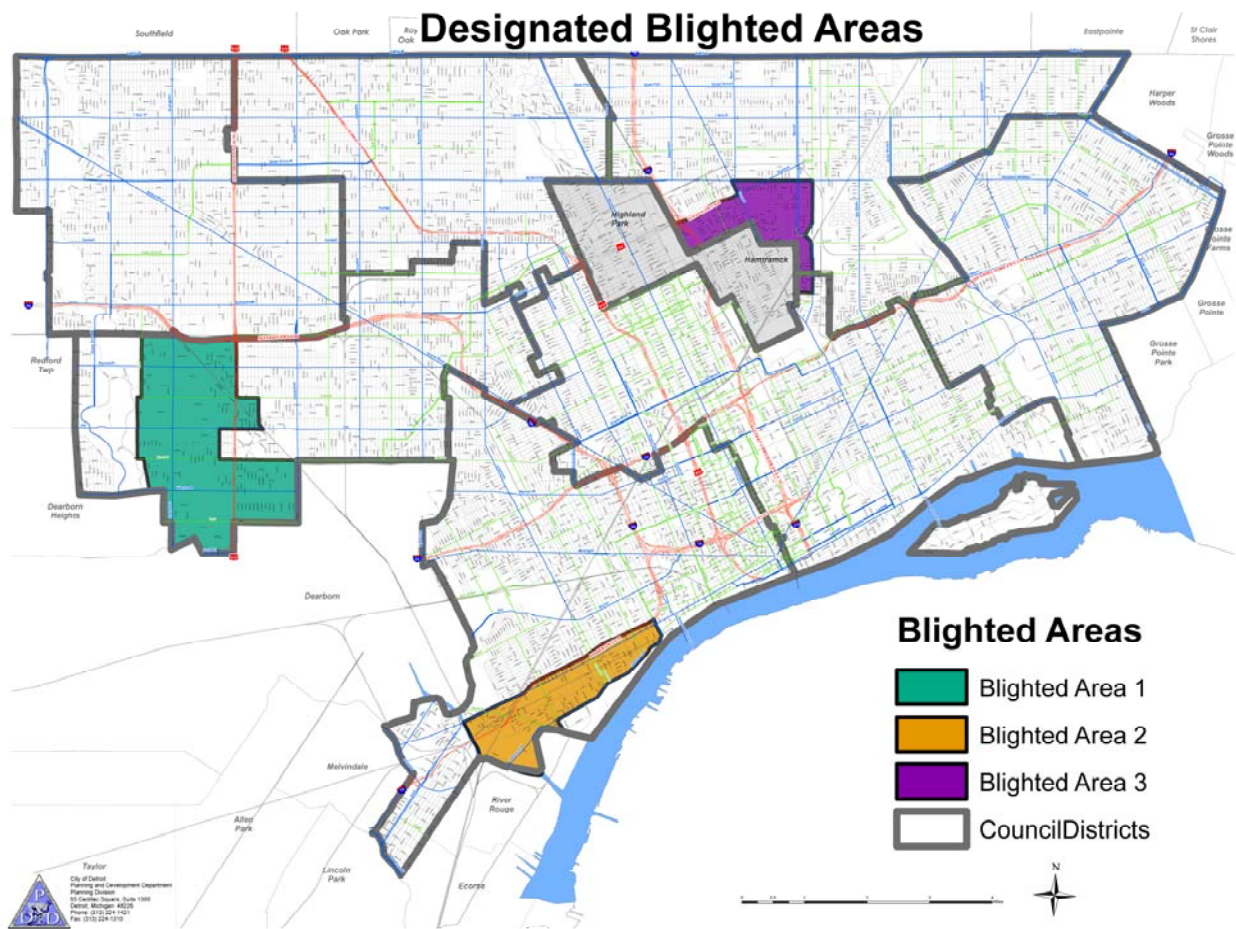
City of Detroit – Master Plan of Policies

10 Neighborhood Clusters targeted through the Strategic Neighborhood Fund (SNF)

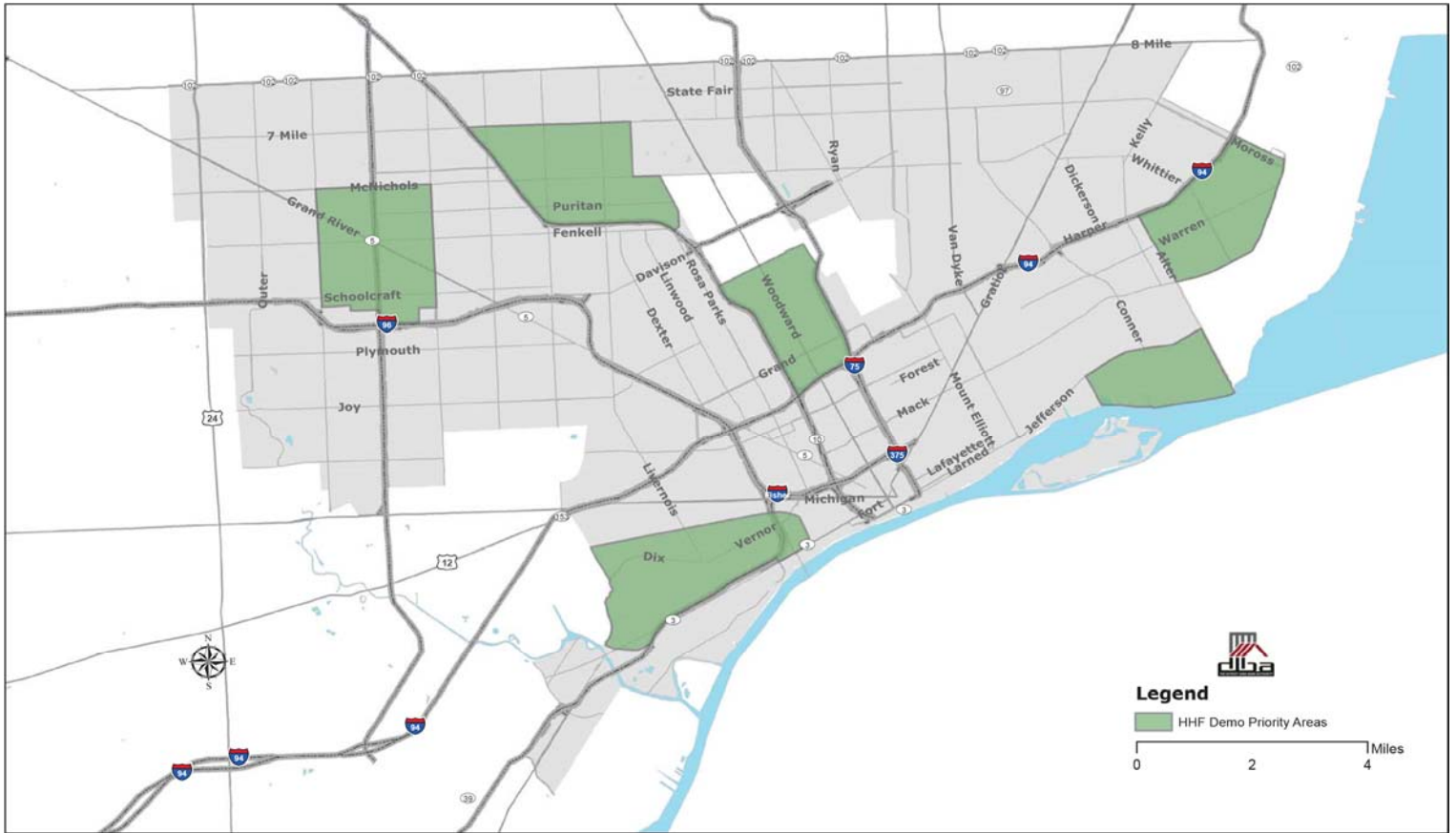




NRSA Boundaries



Slums & Blight Designated Areas



DETROIT LAND BANK AUTHORITY

Source: State of Michigan, City of Detroit
Date: 1/3/2014

Hardest Hit Fund Areas

2,500 units with expiring terms or that are at risk of severe obsolescence that demand more active intervention to preserve affordability. The City is focused on preserving these units as part of the overall preservation goal.

The Development of a Preservation Action Plan

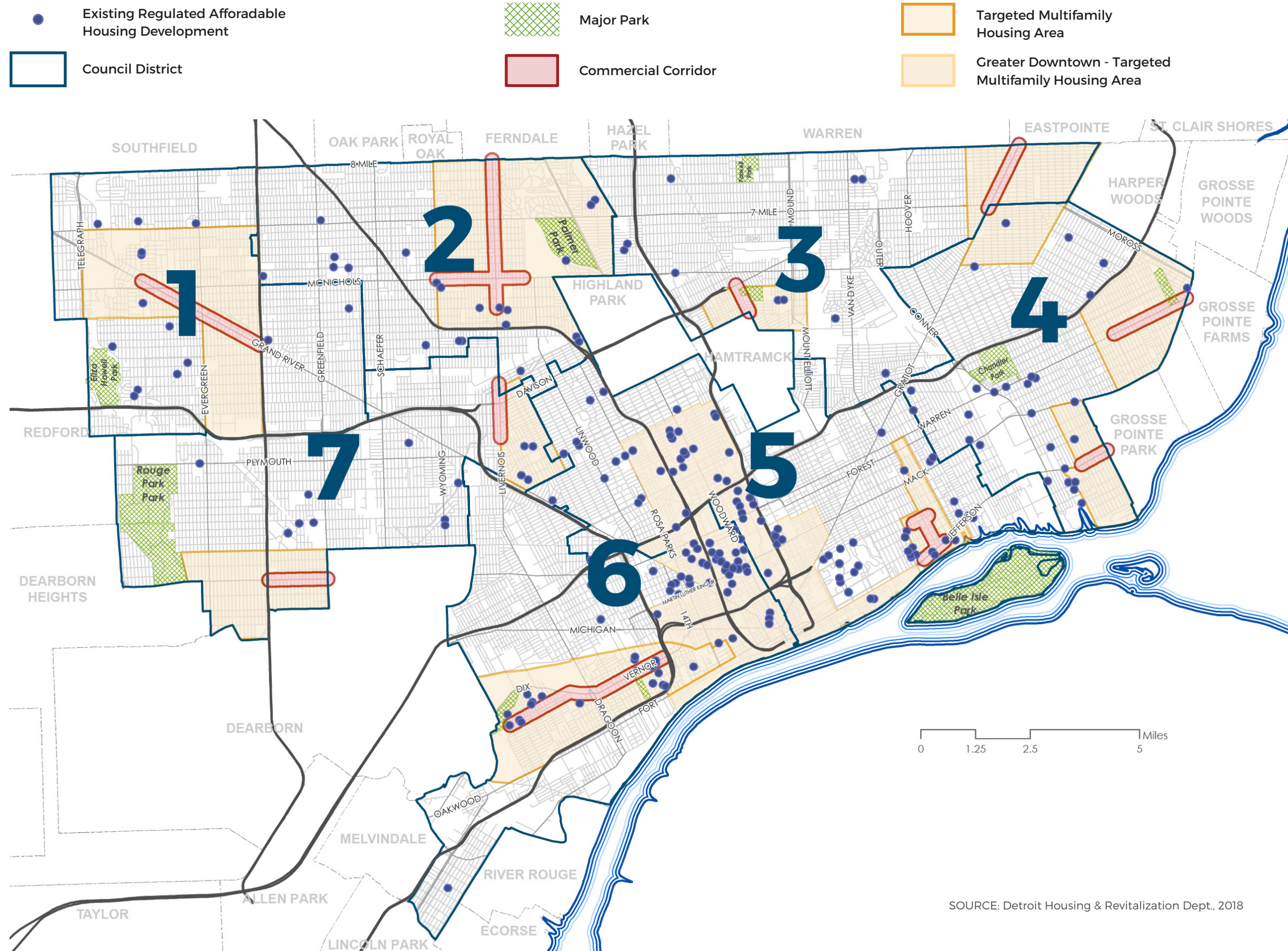
In mid-2017, the City convened and led a task force comprised of community stakeholders to develop a Preservation Action Plan that will guide preservation efforts over the next five years. The creation of this group, known as the Detroit Affordable Housing Preservation Task Force, was modeled on best practices of cities like Chicago, Washington D.C., and Cleveland, which have established task forces to coordinate efforts around securing the long-term affordability and quality of LIHTC properties.

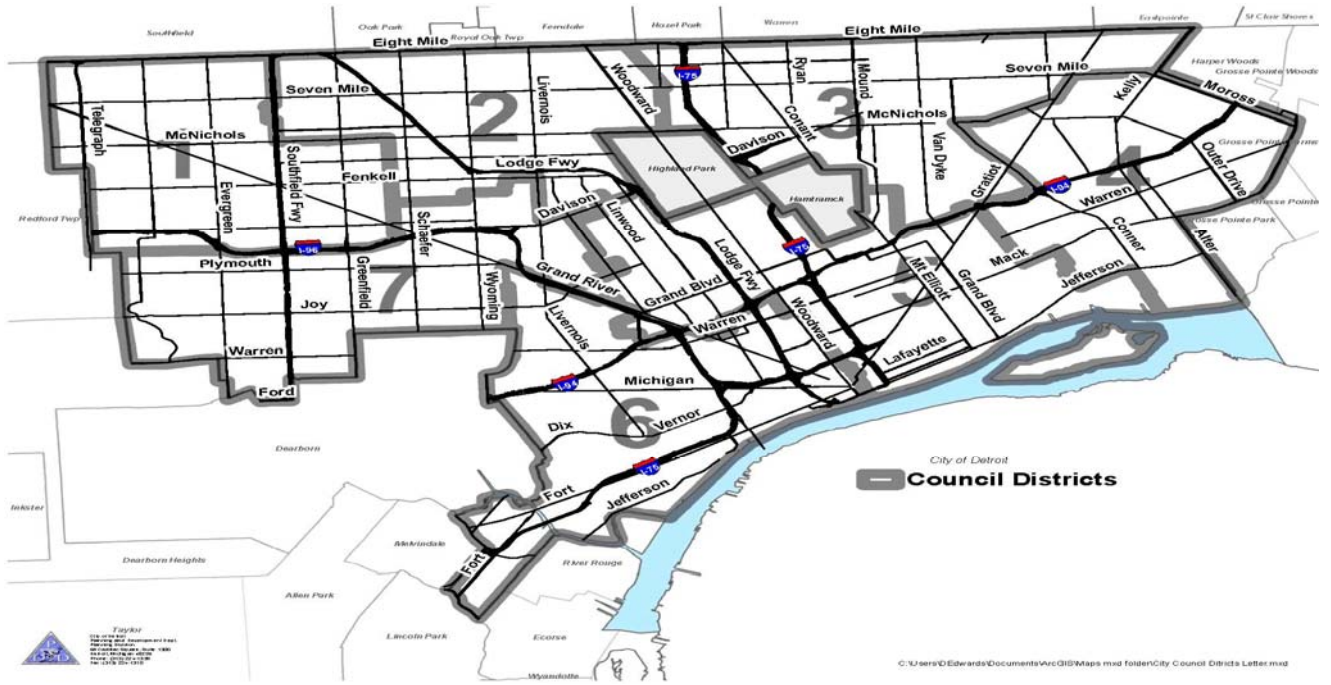
The Task Force's work was informed by previous preservation-focused working groups, including the LIHTC Working Group led by Community Development Advocates of Detroit (CDAD), Senior Housing Preservation-Detroit (SHP-D), the Recapitalization Task Force led by the Detroit Local Initiatives Support Corporation (LISC) office, and the Community Development Financial Institution (CDFI) Coalition of Detroit. The Task Force collaborated on a Preservation Action Plan through four working groups focused on: financially sustainable regulated affordable multifamily housing, financially distressed regulated multifamily housing, naturally occurring affordable multifamily housing, and scattered-site single-family LIHTC developments (not discussed in this document, but an important part of the group's work).

Affordable housing preservation strategies that the City will pursue are based on a shared set of implementation goals:

- Prevent regulated affordable units from converting to market rate.
- Prevent the loss of public investment, specifically HOME investments and rental assistance contracts funded through federal housing assistance programs.

Figure 7: Existing Regulated Affordable Housing Developments





City Council Districts

CENSUS 2010 LOW/MOD MAP

