



CITY OF DETROIT 2022 ANNUAL ACTION PLAN

**Julie Schneider, Director
Housing and Revitalization Department
Coleman A. Young Municipal Center
2 Woodward Avenue, Suite 908
Detroit, MI 48226**

Mayor, Mike Duggan

THIS DOCUMENT CAN BE PROVIDED IN ALTERNATIVE FORMAT & TEXT IF REQUESTED



Table of Contents

Executive Summary	1
AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)	1
The Process	8
PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)	8
AP-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(l) and 91.315(l)	9
AP-12 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)	37
Action Plan	43
AP-15 Expected Resources - 91.220(c) (1,2)	43
AP-20 Annual Goals and Objectives	57
AP-35 Projects – 91.220(d)	67
Affordable Housing	82
AP-50 Geographic Distribution – 91.220(f)	82
AP-55 Affordable Housing – 91.220(g)	86
AP-60 Public Housing – 91.220(h)	91
AP-65 Homeless & Other Special Needs Activities – 91.220(i)	94
AP-70 HOPWA Goals – 91.220 (l)(3)	101
AP-75 Barriers to affordable housing – 91.220(j)	102
AP-85 Other Actions – 91.220(k)	104
Program Specific Requirements	111
AP-90 Program Specific Requirements – 91.220(l) (1,2,4)	111
Appendices (2022-23 Expenditure Budget, Citizens Participation Plan Responses and Maps)	

Executive Summary

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

1. Introduction

As an “entitlement” jurisdiction, the City of Detroit (the “City”) receives formula grant funds from the U.S. Department of Housing and Urban Development (HUD) and is required to submit a Consolidated Plan (the “Con Plan”) every five years pursuant to Federal Regulations at 24CR Part 91. The Con Plan is implemented through the preparation of an Annual Action Plan each of the five years that describes the use of annual formula grants received from HUD for activities delineated in the Con Plan. The process to develop the Con Plan is a collaborative one. The Con Plan process provides a comprehensive housing and community development vision that includes affordable housing, non-housing community development (public facilities, public improvements, infrastructure, public services, and economic development), fair housing, protection of the environment, and an avenue for extensive citizen engagement and feedback.

According to HUD guidance the overall goal of the 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 strengthening partnerships among all levels of government and the private sector, including for-profit and non-profit entities. The City’s FY 2020-2024 Consolidated Plan is used to assess its housing and community development needs; analyze its housing market; establish housing and community development priorities, goals and strategies to address the identified needs; identify the resources to address them; and to stipulate how funds will be allocated to housing and community development activities. Available resources are from the Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with HIV/AIDS (HOPWA) programs, as well as Program Income received and carry over funds, will be leveraged with private sector and other public sector funds to implement these strategies. The Con Plan is also designed to improve program accountability and support results-oriented management. The Con Plan covers the period from July 1, 2020 through June 30, 2025. The Con Plan was submitted to HUD Jan 2021 and received final approval in May 2021.

The City’s FY 2022-23 (third year) Annual Action Plan includes the strategies, goals, and objectives established in the FY 2020-2024 Consolidated Plan and is the annual funding application for the CDBG, HOME, ESG, and HOPWA programs. In addition to the Con Plan, HUD requires that cities and states receiving federal block grants take actions to “affirmatively further fair housing choice.”

For FY 2022-23, the allocation of available funding for the Annual Action is as follows:

- Community Development Block Grant (CDBG) - \$34,525,687
- HOME Investment Partnership (HOME) - \$7,489,290
- Emergency Solutions Grant (ESG) - \$2,986,626

- Housing Opportunities for Persons with HIV/AIDS (HOPWA) - \$3,239,696

The City also has program income from activities facilitated under prior Neighborhood Stabilization Program (NSP) stimulus grants (NSP1, and NSP3). The NSP allocations were expended but the City has the following amounts of program income on hand as of June 21, 2022:

- NSP1 - \$ 104,068.13
- NSP3 - \$ 9,750.88

The City of Detroit applied for and received the Neighborhood Revitalization Strategy Area (“NRSA”) designation from HUD for the 2020-2024 Consolidated Plan. Based on the most recent American Community Survey data, there have been some adjustments to the NRSA boundaries. As a result, the City amended the strategy including eligible activities that are new and others that are incomplete from the previous NRSA designation with a new term.

In 2015, to supplement the benefits of the NRSA in assisting some homeowners with incomes above 80% AMI and removing blighted conditions, the City of Detroit also established three Slum/Blight areas. CDBG funded home repair activities will continue in these three areas to take advantage of activities that aid in the prevention or elimination of slums or blight.

The City of Detroit serves its homeless population through its participation in the Detroit Continuum of Care (CoC). Since 1996, the Homeless Action Network of Detroit (HAND) is the lead agency for services, programs, and data for the Detroit CoC and was consulted as a part of this process. The Detroit Housing Commission (DHC) is Detroit's Public Housing Agency (PHA) administering public housing and Section 8 housing choice vouchers in the City and was consulted as part of this process.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment

Overview:

The City of Detroit has developed its strategic plan based on an analysis of the demographic, housing, and economic development data presented in this plan and the community participation and stakeholder consultation process. Below are the objectives and outcomes that the City has identified under the FY 2020-2024 Consolidated Plan. Actual activities and outcomes may vary each Annual Action Plan year and will be based on those established during the Consolidated Plan process and the amount of the City's annual allocation. Federal law requires that housing and community development grant funds primarily benefit low- and moderate-income persons (LMI), whose household incomes are at or below 80% of the AMI as determined and adjusted annually.

There are three main objectives of the Consolidated Plan and use of federal funds:

1. **Decent and Affordable Housing** - Activities designed to cover the wide range of housing eligible under CDBG and HOME programs.
2. **Suitable Living Environment** - Activities designed to benefit communities, families, or individuals by addressing issues in their environment.

3. **Expanded Economic Opportunities** - This objective applies to economic development, commercial revitalization, and/or job creation/retention activities.

For each objective, the following outcomes and examples of outcome indicators are provided:

- **Availability and Accessibility** - Performance Indicator: Number of Projects that Ensure Access to a Suitable Living Environment/ Number of Persons Provided with New Access to Improvements
- **Affordability** for the Purpose of Providing Decent Housing - Performance Indicator: Households Assisted, Houses Repaired.
- **Sustainability** for the Purpose of Creating Economic Opportunities -Performance Indicator: Number of Businesses Assisted., Number of Jobs created or retained

Through the public input and data analysis, the City has identified six priority needs and related goals to address those needs. The priority needs include: 1) Increased Affordable Housing Options (owner-occupied home repair, rental housing, homeownership assistance); 2) Expanded Economic Development Opportunities; 3) Improved Public Infrastructure and Neighborhood Services; 4) Increased community and public facilities; 5) Expanded Public Services; and 6) Improved Efforts to Prevent Homelessness. To meet these needs, we will continue pursuing the goals over the next three years of the Con Plan. These goals are as follows:

1. Preserve existing affordable housing stock and create new affordable housing for low and moderate-income families
2. Provide employment training, startup business assistance, and job creation and retention
3. Improve neighborhood conditions through water/sewer improvements, streets and sidewalk improvements, and demolition of substandard structures
4. Expanded public and community facilities especially for homeless and children
5. Increased public services especially seniors, recreation, safety, education, mental and physical health, transportation, fair housing, homeless and youth services
6. Reduce homelessness through support services, emergency shelters, permanent supportive housing, and housing for persons with HIV/AIDS

3. Evaluation of past performance

As a recipient of CDBG, HOME, ESG, and HOPWA program funds, the City is required to submit a Consolidated Annual Performance and Evaluation Performance Report (CAPER) at the end of each program year. The CAPER summarizes the program year accomplishments and the progress towards the Consolidated Plan goals. As noted in the 2021 CAPER, based on the priorities established, the City continues to place emphasis on decent, safe, and affordable housing; elimination of homelessness; public services; fair housing activities; improvement of neighborhood conditions; and economic development.

The City extended its affordability period with HOME developers to preserve City-assisted affordable housing projects and allow existing residents to remain in the City while attracting new residents by negotiating partial loan payoffs and modifications. The city continued to implement its major housing rehabilitation programs throughout the city using a loan program and grants to stabilize neighborhoods.

Since federal funding cannot sustain the great need for city residents, the city has added its general

funding to support the single-family rehabilitation housing program primarily for seniors and the disabled. Throughout the year, several new initiatives such as the auction of publicly owned houses, sale of vacant lots, aggressive code enforcement and an expansive demolition effort helped stabilize neighborhoods.

For FY 2020-21 as reported in the CAPER, the City of Detroit's performance was evaluated by staff who noted the following accomplishments and challenges:

- In 2020, activities implemented with CDBG, HOME, ESG and HOPWA funds benefited a total of 143,591 individuals.
- The City of Detroit stayed within the statutory CDBG expenditure limitations for planning and administration at 19.85 percent and public services at 14.59 percent.
- Over 70 percent (78.75%) of the City of Detroit's CDBG funds were expended on activities that benefited low and moderate-income residents (Primary Objective).
- The City was able to rehab 498 housing units over the last year including 48 rental housing and 450 owner-occupied single-family houses.
- Continued to address lead poisoning issues in housing rehabilitation by abating lead in these units. The City received \$2M grant from the HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH) in the 48209 zip code that will serve 298 households and continues to use CDBG funding to leverage HUD OLHCHH Lead Funding to serve another 170 households through its City-Wide program.
- To reduce the number of homeless citizens, the City assisted 490 households with public services and financial assistance to homeowners with the CDBG-CV activities from the CARES Act funds
- There were 4 commercial buildings demolished
- Under the Grow Detroit's Young Talent (GDYT), Detroit Employment Solutions Corporation (DESC) leveraged over \$3.2 million and provided over 3,500 youth job placement and training services. The City has invested \$3 million over last 2 years on the Summer Youth Jobs training program in partnership with private businesses and nonprofit organizations.
- Through July 2020, the City expended all of the CDBG Disaster Recovery funding, which was used to complete several infrastructure improvement projects, which included, but was not limited to greenway and storm water management studies, solar projects, support for single-family housing strategy, park renovations, and purchase of easements resulting in 13,510 persons served.
- The Emergency Solutions Grant (ESG) provided 9,672 homeless families and individuals with shelter and meals.
- ESG provided a wide variety of services to the homeless population, 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 grant funds assisted 222 households with rental assistance or long-term housing.
- HOPWA provided 35 households with housing subsidies.

- HOPWA provided a wide range of additional support services to 500 individuals, including housing placement, short-term emergency assistance, transportation, case management, life skills classes, health advocacy, clothing, and light housekeeping.
- The City of Detroit received over \$30 million in Coronavirus Aid, Relief and Economic Securities (CARES) Act to provide assistance to citizens. After the June 2021 flood, the city used some of CARES Act funds to assist with the clean-up in the most impacted areas.
- However, despite of the pandemic, the City met the CDBG timeliness expenditure, reflecting less than 1.5 times the annual allocation on hand as of May 2021.

4. Summary of citizen participation process and consultation process

During the development of the HUD Consolidated Plan and/or the Annual Action Plan, at least two public hearings must be held. Public hearings are held during the development of the plan and after the plan drafted up to the final approval by the City Council to maximize public input. Due to continued COVID-19 variances affecting the City’s ability to perform public meetings and focus groups; however, the City adapted and amended its citizen participation plan to include virtual meetings. There were four (4) virtual workshops held for the CDBG/NOF and Homeless public service proposals. There were also two (2) virtual public hearings for the Annual Action Plan and two (2) City Council approval hearings for the public.

The City’s Housing and Revitalization Department (“HRD”) consulted with over 48 organizations, including City Departments and other governmental entities through interviews, email, web research, and an online questionnaire in developing the needs, priorities, and goals for the Con Plan.

5. Summary of public comments

Residents and other stakeholder comments were focused on the following:

Programs and their impact: Several stakeholders sought information on the HRD Home Repair Program and the application process. Questions included funding availability for senior populations, the status on the waiting list and if the consolidated plan will continue to include funding for this type of home repair in the future.

Infrastructure: Community interest and concern with the city’s infrastructure regarding flooding assistance w/flood claims for city residents, homes and property were high.

Loan Programs: Comments and questions were received about the 0% Interest Loan Program, how to qualify, the application process, and how many applications are accepted.

Funding: Related to CDBG/NOF Funds, questions were received and answered about the application processes for funding, deadlines, and what type of programs will be funded.

Other: 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, CDBG and HUD ESG regulations, and how to measure impact.

City officials answered questions and referred citizens to the relevant departments where applicable.

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

All comments or views were accepted.

7. Summary

The strategy for community success must begin at the community level, using that as a catalyst for the entire City's recovery. Citizens within the City of Detroit have many needs as expressed through the comments presented and data regarding the number of vulnerable populations. Through the funds afforded the City through the Consolidated Plan/Annual Action Plan, our goal is to serve the citizens of Detroit through their communities and prepare a way out of poverty whenever possible. Based on citizen comment summaries in section 5, attendees were very interested in CDBG program guidelines, wanted more coordination among the City's federal programming and were deeply concerned about the health of their communities. Attendees had questions regarding the proposed allocation of federal grant dollars and how these funds could make a difference in their neighborhoods.

In 2020, the City received HUD approval for the renewal of the of five (5) geographic areas as Neighborhood Revitalization Strategy Areas (NRSAs), to focus CDBG and other federal grants and leverage existing non-CDBG redevelopment initiatives and funding in these targeted areas. In 2015, the City also did a local designation of three areas as slum and blight areas that are contiguous with the NRSAs but not included in them allowing the City to provide CDBG home repair loan funds to assist some homeowners who are above 80% of area median income (AMI). The benefits of the NRSA are Job Creation/Retention on Low/Moderate Income Area Benefit, Aggregation of Housing Units to allow assistance to no more than 49% of clients served at over 80% AMI; Aggregate Public Benefit Standard Exemption; and Public Service Cap Exemption. While the strategy proved successful, resulting in NRSA investments (see chart below), the need is still great. Given the significant increase in private sector investments and public private sector collaboration in LMI neighborhoods, a renewal of the NRSA designation was needed to continue benefiting community residents in the redefined designated areas.

NRSA Accomplishment Chart:

Benchmark	Objective	Activity	In NRSA 7/1/20-6/30/21	CDBG Spent from 7/1/20-6/30/21
Expand workforce development in NRSA's	Growing Detroit Young Talent (GDYT) and Occupational Training Program	Increase soft skills and work experience for low –to moderate – income youth located within qualifying NRSA's	<ul style="list-style-type: none"> • NRSA 1: 326 • NRSA 2: 1087 • NRSA 3: 792 • NRSA 4: 1164 • NRSA 5: 1179 	<ul style="list-style-type: none"> • NRSA 1: \$103,521 • NRSA 2: \$365,742.50 • NRSA 3: \$257,142 • NRSA 4: \$385,543 • NRSA 5: \$385,081 <p>Additional Amount Leveraged: \$9,452,500.00</p>
Conduct lead abatement	Lead abatement grants	Lead-free houses	<ul style="list-style-type: none"> • NRSA 1: 2 • NRSA 2: 1 • NRSA 3: 3 • NRSA 4: 0 • NRSA 5: 0 	<ul style="list-style-type: none"> • NRSA 1: \$261,430 • NRSA 2: \$32,901 • NRSA 3: \$44,010 • NRSA 4: \$0 • NRSA 5: \$0
Help elderly households remain in their homes	Emergency repair grants	Emergency units repaired	<ul style="list-style-type: none"> • NRSA 1: 15 • NRSA 2: 9 • NRSA 3: 8 • NRSA 4: 6 • NRSA 5: 10 	<ul style="list-style-type: none"> • NRSA 1: \$267,642 • NRSA 2: \$115,389 • NRSA 3: \$117,812 • NRSA 4: \$82,491 • NRSA 5: \$170,742
Neighborhood improvements	Demolish unsafe structures	Demolitions	<ul style="list-style-type: none"> • NRSA 1: 3 • NRSA 2: 2 • NRSA 3: 2 • NRSA 4: 0 • NRSA 5: 1 	<ul style="list-style-type: none"> • NRSA 1: \$102,418 • NRSA 2: \$54,086 • NRSA 3: \$61,816 • NRSA 4: \$0 • NRSA 5: \$22,862

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

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

Agency Role	Name	Department/Agency
CDBG Administrator	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

The City of Detroit Housing and Revitalization Department (HRD) is the lead agency responsible for preparing and implementing the Consolidated Plan. The Department is also responsible for administering the expenditures of federal funds received from the U. S. Department of Housing and Urban Development (HUD) and for the implementation of the priorities and goals identified in this plan. The City currently receives entitlement Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with HIV/AIDS (HOPWA) from HUD. The Department administers the CDBG, HOME, and ESG grant programs and the Detroit Health Department administers the HOPWA program.

To accomplish the priorities and goals presented in this plan, HRD will collaborate with non-profit organizations, for-profit businesses, other City Departments, local, regional, and State of Michigan governmental units and organizations that strive to improve conditions of Detroit residents and neighborhoods. State of Michigan resources included low-income housing tax credits, and lead hazard grants. The Detroit Health Department partners with a network of hospitals, clinics, and experienced non-profit service providers to care for and treat persons living with HIV/AIDS.

Annual Action Plan Public Contact Information

City of Detroit, Housing and Revitalization Department
 Coleman A. Young Municipal Center
 2 Woodward Avenue, Suite 908
 Detroit, MI 48226
 313 224-6380 TTY: 711

AP-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

1. Introduction

A critical part of the development of the 2020-2024 HUD Consolidated Plan and the 2022-23 Annual Action Plan involved consultations with housing providers, non-profit organizations, social service providers, and other key stakeholders that serve the communities impacted by the funding received from HUD. In the development of the Plan, the City of Detroit conducted an extensive outreach process, using community surveys and meetings to solicit input from critical stakeholders within the City and the region to assist in identifying housing and community development needs, and in developing priorities, goals, and strategies for the allocation of federal funding over the next five fiscal years.

The City's outreach effort was designed to solicit the input of a variety of community stakeholders to fully capture the scope of needs within the City and provide a more effective and meaningful process. These stakeholders included organizations working with LMI households, other City departments, regional and local government jurisdictions, the Detroit Housing Commission, the Detroit Continuum of Care, various non-profit agencies, and fair housing and community health organizations (see Table 2 below).

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))

The City of Detroit is committed to collaborating with public and private housing providers and area agencies to ensure their efforts align with the City's affordable housing goals. To accomplish this, the City of Detroit Housing & Revitalization Department (HRD) works as a strategic by partnering with the Detroit Health Department and various other community mental health agencies on ways to improve coordination among agencies serving the City's LMI populations. In recent years, over seventy percent of the City's HUD funds have been targeted in geographic locations that align with investments by other stakeholders, thereby making the best use of existing community assets and advancing the restoration of distressed communities.

HRD is working with the Detroit Housing Commission (DHC) on the Path to High-Performance goal. The goal of acquiring and disposing of vacant units from the DHC's portfolio will be achieved in collaboration with the DLBA and DBA. These vacant units represent barriers to DHC's ability to revitalize distressed areas and effectively serve low income Detroiters.

HRD regularly consults with the Detroit Land Bank Authority (DLBA) on making vacant homes and properties available to LMI residents, and with the Detroit Building Authority (DBA) on efforts to improve housing options for low-income residents of the City on demolition and resale programs.

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.

Since 1996, the Homeless Action Network of Detroit (HAND) has served as lead agency for the Detroit Continuum of Care (CoC). The City of Detroit works together with HAND to provide services to homeless individuals and families. HRD staff has worked extensively with HAND to develop goals and strategies for Detroit's homeless populations, and HAND staff has been involved in reviewing both ESG and CDBG proposals over the last many years. This collaboration will allow for more efficiency and better outcomes as homeless strategies and goals are implemented.

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. The City of Detroit maintains three seats on the CoC Board, as well as on the various subcommittees formed to focus on specific issues such as Veterans homelessness, Chronic homeless, youth homelessness, etc.

Through participation on the CoC board, the City of Detroit is able to meet regularly with HAND to better coordinate services for homeless persons (particularly the targeted populations such as chronic, youth, veterans, etc.) and persons at risk of homelessness. Through these coordinated efforts, the City can better align the use of McKinney-Vento funding to the homeless priorities outlined in the homelessness strategy of this Consolidated Plan.

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 continue to consult with HAND in determining how best to allocate ESG funding to address the highest priority needs. The City, together with HAND and various other funders of homeless services, collaborated in the development of written performance standards and evaluation techniques for the use of ESG and other funds within the continuum. This collaboration led to the creation of a Performance and Evaluation Committee that oversees implementation of the written standards and the development of a collaborative monitoring process for all recipients of homeless funding. This will allow a "full picture" assessment of an organizations performance across programs to ensure they are achieving the desired impact to end homelessness for Detroit residents.

In addition, HAND participates in the development of HRD's CDBG and ESG Request for Proposals and participates in the application review process to ensure that applicants align their efforts with the CoC's strategies, that the CoC strives to fund quality providers that serve HUD priority populations, and that funding applications are in agreement regarding local community needs.

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?	Homeless Strategy 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?	Consultation was done through meetings/teleconferences and review of website and materials. Detroit Housing Commission and HRD collaborates on efforts to coordinate projects within the City of Detroit w/the goal of increasing housing opportunities.
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 - Chronic Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Housing Needs Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	HAND was consulted via email and teleconferences and is closely involved in CDBG and ESG homeless planning and implementation activities throughout the plan period. Since 1996, HAND has served as the lead entity for the Continuum of Care for the City of Detroit, although its jurisdictional responsibilities stretch to cities such as Hamtramck and Highland Park 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 Housing Needs Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation was done through a review of their website and their assessment of fair housing report. The Fair Housing Center (FHC) of Metropolitan Detroit conducts training, fair housing tests, and represent fair housing cases in Metro Detroit. The City will partner with the organization on training and fair housing conferences.
4	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?	Meetings were held with the Department of Neighborhoods staff to coordinate information and plan strategies on the distribution of e-blast notices and flyers to promote the Consolidated Plan virtual meetings and assist HRD regarding blight control and neighborhood conditions.
5	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?	Consulted with the Domestic Violence Unit via their website for information to determine how the City can assist with funding strategies for domestic violence survivors.
6	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?	HRD consulted with the Detroit Health Department via email, teleconference, and their website. This coordination will allow us to determine the best program strategy for substance abuse. Consultation was also done with the HOPWA coordinator regarding the HIV/AIDS and HOPWA programs. This coordination helps define Consolidated Plan HIV/AIDS strategies. The City of Detroit Health Department leads the Lead Safe Detroit working group that meets monthly to drives strategies around lead poisoning, and refers eligible households impacted by lead-based paint to HRD lead programs. Additionally, Agency input on target populations, services, and needs was received via an online survey and identified the need for financial resources, increased wages, and resolving of policy/board issues.
7	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?	Regular discussions with the HOME Investment Partnership team, CDBG Emergency Housing Homeless grant team, and the team with oversight for the subrecipient administered Zero percent Interest Loan program to discuss/document housing rehabilitation plans.
8	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?	Information was received from DLBA staff and their website regarding completed work and upcoming initiatives. HRD will use the information to better coordinate and report on demolition and blight control efforts.
9	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?	Consultation and research were done through website review, to determine the type and extent of economic strategies available to revitalize the City of Detroit.
10	Agency/Group/Organization	Detroit Building Authority
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Coordination of 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?	Consultations with the Demolition Coordinator occurred to understand the coordinated efforts of demolition activities between HRD, DON, and DBA and how CDBG and other non-federal resources will assist in achieving the City's demolition goals.
11	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?	Meetings and email were used to consult with the Detroit LISC office that is a CDBG subrecipient for administering the City's 0% interest loan program. The program is operated in the city's Neighborhood Revitalization Strategy Areas (NRSA) and the designated Slum and Blighted areas. LISC's coordinated efforts works with providing loans to low- and moderate-income persons in these designated strategy areas. Also, input on target populations, services, and needs was received via an online survey.
12	Agency/Group/Organization	Detroit Employment Solution Corporation
	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 Corporation (DESC) along with City Connect Detroit are consulted to operate and provide the City's Summer Youth Employment and Job Training programs. These efforts support LMI youth living in areas designated in one of the five Neighborhood Revitalization Strategy Areas. The anticipated outcome was program renewal and alignment of new NRSA goals.
13	Agency/Group/Organization	Southwest Solutions
	Agency/Group/Organization Type	Services - Housing Services-Employment Mental Health
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Non-housing community development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted with thorough review of plans and website. Need for greater coordination of services and housing development was identified.

14	Agency/Group/Organization	Civil Rights, Inclusion & Opportunity Department (CRIO)
	Agency/Group/Organization Type	Services – Housing Complaints Services – Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation was done by reviewing their website. Agency assures all City of Detroit residents, visitors, and employees enjoy a safe environment, free of discriminatory barriers, training and job opportunities on construction projects. The review revealed a greater need to increase awareness of the agency’s purpose and service.
15	Agency/Group/Organization	United Community Housing Coalition
	Agency/Group/Organization Type	Services – Housing Other – Advocacy Organization
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Market Analysis Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied Youth Homelessness Strategy Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency input on target populations, services, and needs was received via an online survey and website research. The anticipated outcome is increasing awareness of the services the organization offers.
16	Agency/Group/Organization	Wellspring
	Agency/Group/Organization Type	Services - Children
	What section of the Plan was addressed by Consultation?	Other – Reading and Language arts Proficiency

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency input on target populations, services, and needs was received via an online survey. The consultation identified the need for increased resources and addressing transportation issues for clients.
17	Agency/Group/Organization	Joy Southfield Community Development Corporation
	Agency/Group/Organization Type	Health Agency Housing Other – Advocacy Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment 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?	Agency input on target populations, services, and needs was received via an online survey. The consultation identified the need for increased resources and awareness of services
18	Agency/Group/Organization	Urban Neighborhood Initiatives
	Agency/Group/Organization Type	Services – Children Services – Employment Housing Other – Advocacy Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment 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?	Agency input on target populations, services, and needs was received via an online survey. The consultation identified the need for increased resources and technological improvements.

19	Agency/Group/Organization	Eastside Community Network
	Agency/Group/Organization Type	Services – Children Services – Employment Services-Persons with Disabilities Housing Other – Advocacy Organization; Transportation Services; Civic Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development Non-Homeless Special Need
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency input on target populations, services, and needs was received via an online survey. The consultation identified the need for increased resources and transportation solutions for clients to access services.
20	Agency/Group/Organization	Community Development Advocates of Detroit (CDAD)
	Agency/Group/Organization Type	Other – Advocacy Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment 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?	Agency input on target populations, services, and needs was received via an online survey and website research. The anticipated outcome was increasing awareness of services, increased resources, and greater coordination between service providers.
21	Agency/Group/Organization	Freedom House Detroit
	Agency/Group/Organization Type	Services – Employment Services – Persons with HIV/AIDS Services – Victims of Domestic Violence Services - Homeless Other – Transportation Services; Legal Assistance; Mental Health Services

	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Market Analysis Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied Youth Homelessness Strategy Non-Homeless Special Need
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency input on target populations, services, and needs was received via an online survey. The consultation identified the need for increased knowledge and awareness of agency services, and increased resources.
22	Agency/Group/Organization	COTS
	Agency/Group/Organization Type	Services – Employment Services – Children Services – Victims of Domestic Violence Services - Homeless Other – Transportation Services
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Market Analysis Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied Youth Homelessness Strategy Non-Homeless Special Need
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency input on target populations, services, and needs was received via an online survey. The consultation identified the need for increased resources, and the knowledge and awareness of agency services to better serve clients.

23	Agency/Group/Organization	Goodwill Industries of Greater Detroit
	Agency/Group/Organization Type	Services – Employment Services - Homeless Other – Transportation Services; Soup kitchens & food pantries
	What section of the Plan was addressed by Consultation?	Market Analysis 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?	Agency input on target populations, services, and needs was received via an online survey and website research. The anticipated outcome is greater coordination to encourage citizens to return to Detroit and increase the public services available particularly for young men aged 18 – 39
24	Agency/Group/Organization	Central Detroit Christian Community Development Corporation
	Agency/Group/Organization Type	Services – Education Services – Housing Services – Children Services – Fair Housing Services – Employment Services – Homeless Other – Advocacy Organization; Soup kitchens & food pantries

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development 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?	Agency input on target populations, services, and needs was received via an online survey. The consultation identified the need for increased resources.
25	Agency/Group/Organization	Detroit Future City
	Agency/Group/Organization Type	Housing Other – Planning Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment 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?	Agency input on target populations, services, and needs was received via an online survey and website research. The agency’s anticipated outcome is greater coordination for re-purposing the glut of single-family vacant properties for productive reuse and working to prevent the exodus of local dollars to other cities

26	Agency/Group/Organization	Southeastern Michigan Health Association (SEMHA)
	Agency/Group/Organization Type	Housing Services-Education Services – Employment Services – Fair Housing Services – Victims of Domestic Violence Services – Persons with disabilities Services – Homeless Other – HIV/AIDS Services
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development HOPWA Strategy Non-Homeless Special Need
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency input on target populations, services, and needs was received via an online survey. The consultation identified the need for client transportation, greater coordination, and increased resources for service delivery.
27	Agency/Group/Organization	World Medical Relief Inc.
	Agency/Group/Organization Type	Services-Elderly Persons Services-Persons with Disabilities Other – Prescription Assistance; Medical Supply Assistance
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Need
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency input on target populations, services, and needs was received via an online survey. The consultation identified the need for increased resources and technological improvements.
28	Agency/Group/Organization	Dominican Literacy Center
	Agency/Group/Organization Type	Other – Adult Education / Workforce Readiness

	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?	Agency input on target populations, services, and needs was received via an online survey. The consultation identified the need for increased resources and resolving clients' transportation issues.
29	Agency/Group/Organization	Wayne County Neighborhood Legal Services/dba/Neighborhood Legal Services Michigan
	Agency/Group/Organization Type	Housing Services-Elderly Persons Services – Education Services-Victims of Domestic Violence Services-homeless Other – Advocacy organization; Legal Assistance; Mediation
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development Non-Homeless Special Need 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?	Agency input on target populations, services, and needs was received via an online survey. The consultation identified the need for less restrictive program requirements to enhance services.

30	Agency/Group/Organization	Mercy Education Project
	Agency/Group/Organization Type	Housing Services-Elderly Persons Services – Education Services-Victims of Domestic Violence Services-homeless Other – Advocacy organization; Legal Assistance; Mediation
	What section of the Plan was addressed by Consultation?	Economic Development Non-Homeless Special Need
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency input on target populations, services, and needs was received via an online survey. The consultation identified the need for increased resources and resolving clients’ transportation issues.
31	Agency/Group/Organization	Legal Aid and Defender Assn., Inc.
	Agency/Group/Organization Type	Services – Homeless Services-Victims of Domestic Violence Services – Children Services – Employment Other – Mental Health; Legal Assistance; Transportation; Advocacy Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development Non-Homeless Special Need
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency input on target populations, services, and needs was received via an online survey. The consultation identified the need for financial resources, volunteers and increased awareness of services provided.

32	Agency/Group/Organization	The NOAH Project - Central United Methodist Church of Detroit Community Development Corporation
	Agency/Group/Organization Type	Services - Persons with HIV/AIDS Services – Homeless Other – Health Care Agency; Mental Health; Soup kitchens & food pantries
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development Non-Homeless Special Need
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency input on target populations, services, and needs was received via an online survey. The consultation identified the need for increased resources.
33	Agency/Group/Organization	The Yunion
	Agency/Group/Organization Type	Services - Persons with HIV/AIDS Services – Health Services - Education
	What section of the Plan was addressed by Consultation?	Economic Development Non-Homeless Special Need
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency input on target populations, services, and needs was received via an online survey. The consultation identified the need for increased resources, resolving clients’ transportation issues, and reduction in, restrictive program eligibility requirements.
34	Agency/Group/Organization	The Youth Connection, Inc.
	Agency/Group/Organization Type	Services - Employment Services – Children
	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?	Agency input on target populations, services, and needs was received via an online survey. The consultation identified the need for increased resources, resolving clients’ transportation issues, and reduction in, restrictive program eligibility requirements.
35	Agency/Group/Organization	Detroit Area Pre-College Engineering Program, Inc. (DAPCEP)
	Agency/Group/Organization Type	Services - Employment Services – Children Services – Education
	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?	Agency input on target populations, services, and needs was received via an online survey. The consultation identified the need for increased resources, resolving clients’ transportation issues, and reduction in, restrictive program eligibility requirements.
36	Agency/Group/Organization	Community Social Services of Wayne County
	Agency/Group/Organization Type	Services - Education Services - Homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied Youth Homelessness Strategy Economic Development Housing Needs Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency input on target populations, services, and needs was received via an online survey. The consultation identified the need for increased resources.

37	Agency/Group/Organization	Cass Community Social Services
	Agency/Group/Organization Type	Services – Education Services - Persons with disabilities Services – Persons with HIV/AIDS Services – Homeless Other – Transportation
	What section of the Plan was addressed by Consultation?	Economic Development Non-Homeless Special Need Housing Needs Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency input on target populations, services, and needs was received via an online survey. The consultation identified the need for help with increased resources.
38	Agency/Group/Organization	L&L Adult Day Care, Inc.
	Agency/Group/Organization Type	Services – Elderly Persons Services – Persons with disabilities Other – Transportation
	What section of the Plan was addressed by Consultation?	Economic Development Non-Homeless Special Need
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency input on target populations, services, and needs was received via an online survey. The consultation identified the need for increased awareness of services provided, resources and resolving clients' transportation issues.
39	Agency/Group/Organization	Jefferson East, Inc.
	Agency/Group/Organization Type	Services – Education Services – Housing Services - Victims of domestic violence Other – Advocacy Organization; Planning Organization; Public infrastructure improvements – streets, sidewalks, parks, and recreational centers

	What section of the Plan was addressed by Consultation?	Housing Market Analysis Economic Development Non-Homeless Special Need
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency input on target populations, services, and needs was received via an online survey. The consultation identified the need for increased resources, and technological improvements.
40	Agency/Group/Organization	Cody Rouge Community Action Alliance
	Agency/Group/Organization Type	Services – Education Services – Elderly Persons Services - Housing Services – Children Services - Employment Other – Advocacy organization; Planning Organization; Economic development – small business & microenterprise assistance
	What section of the Plan was addressed by Consultation?	Housing Market Analysis Economic Development Non-Homeless Special Need
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency input on target populations, services, and needs was received via an online survey. The consultation identified the need for increased resources and resolving clients’ transportation issues.
41	Agency/Group/Organization	People's Community Services of Metropolitan Detroit
	Agency/Group/Organization Type	Services – Children Services - Homeless Other – Transportation; Public facilities including parks, community centers, service centers
	What section of the Plan was addressed by Consultation?	Economic Development Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Housing Needs Assessment Market Analysis

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency input on target populations, services, and needs was received via an online survey. The consultation identified the need for increased resources and resolving clients' transportation issues.
42	Agency/Group/Organization	Mosaic Youth Services
	Agency/Group/Organization Type	Services – Children Services – Employment Other – Advocacy Organization; Child welfare agency
	What section of the Plan was addressed by Consultation?	Economic Development Non-Homeless Special Need
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation was done via website review. Serving Detroit area youth ages 11 – 18, project is the expanded Mosaic Youth Ensembles tiered Creative Youth Development program, specifically the Second Stage, Main Stage, Next Stage ensembles; and Mosaic's new backstage technical theatre workforce development program, providing opportunities for youth employment and empowerment; and supporting the creation of quality artistic work. Need for increased awareness of services and coordination.
43	Agency/Group/Organization	My Community Dental Center
	Agency/Group/Organization Type	Services – Elderly Persons Services – Children Services-Persons with HIV/AIDS Other – Dental health for all ages
	What section of the Plan was addressed by Consultation?	Economic Development Non-Homeless Special Need
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency input on target populations, services, and needs was received via an online survey. The consultation identified the need for help with clients' transportation issues, increased resources, and increased awareness of services.

44	Agency/Group/Organization	Matrix Human Services
	Agency/Group/Organization Type	Services – Elderly Persons Services – Education Services – Children Services - Employment Services-Persons with HIV/AIDS Other – Head start community center
	What section of the Plan was addressed by Consultation?	Economic Development Non-Homeless Special Need
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency input on target populations, services, and needs was received via an online survey. The consultation identified the need increased resources and awareness of services.
45	Agency/Group/Organization	Data Driven Detroit (D3)
	Agency/Group/Organization Type	Low-profit Limited Liability Corporation (L3C)
	What section of the Plan was addressed by Consultation?	<input checked="" type="checkbox"/> Housing Market Analysis <input type="checkbox"/> Services - Broadband Internet Service Providers <input checked="" type="checkbox"/> Services - Narrowing the Digital Divide <input checked="" type="checkbox"/> Civic Leaders <input checked="" type="checkbox"/> Services – Addressing Climate Change Impact
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation was done through email, teleconference and review of website and materials. D3 collaborates with the City of Detroit, several CDBG and HOME funded entities, and the community at large to provide housing and community development data including maps, visualizations, datasets and other tools. As well, D3 conduct workshops, trainings and presentations and free public access across Detroit to increase data literacy and address the digital divide around data. D3 works on the CONNECT 313 – Powered by Detroit project which seeks to further equitable internet access and the Detroit Climate Strategy. See link to the website: Data Driven Detroit Data Driven Detroit
46	Agency/Group/Organization	Detroit Community Technology Project

	Agency/Group/Organization Type	Non-profit organization
	What section of the Plan was addressed by Consultation?	<input checked="" type="checkbox"/> Housing Market Analysis <input checked="" type="checkbox"/> Civic Leaders <input checked="" type="checkbox"/> Services - Broadband Internet Service Providers <input checked="" type="checkbox"/> Services - Narrowing the Digital Divide
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	<p>The organization was consulted via email and review of website and materials. It is involved in designing, building and facilitating a healthy integration of technology into people’s lives and communities, allowing them the fundamental human right to communicate. Using community engagement, the organization is addressing the digital divide and expanding technology access to LMI communities and households. The organization works on the Connect 313 project which seeks to further equitable internet access and community digital stewards. See link to website - Technology Rooted in Community Needs Detroit Community Technology Project</p>
47	Agency/Group/Organization	Detroit Department of Digital Inclusion
	Agency/Group/Organization Type	Other government - Local Grantee Department
	What section of the Plan was addressed by Consultation?	<input checked="" type="checkbox"/> Housing Market Analysis <input checked="" type="checkbox"/> Civic Leaders <input type="checkbox"/> Services - Broadband Internet Service Providers <input checked="" type="checkbox"/> Services - Narrowing the Digital Divide

	<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Consultation was done through email, teleconference and review of website and materials. The Department’s mission is to develop and implement a sustainable Digital Inclusion Strategy. All Detroiters will be able access the digital world, and the opportunity that it brings through internet access (hot spots, low-cost internet), devices (computer labs, free computers), and digital skills (classes, tech support) especially in LMI households and communities. Collaborates with community organizations, and the community at large to increase online banking, healthcare, homework, education, workforce development and job opportunities requiring computer skills. The Department coordinates the CONNECT 313 – Powered by Detroit Initiative. See link to website: Digital Inclusion Mission City of Detroit (detroitmi.gov)</p>
48	<p>Agency/Group/Organization</p>	<p>Detroit Office of Sustainability</p>
	<p>Agency/Group/Organization Type</p>	<p>Other government - Local Grantee Department</p>
	<p>What section of the Plan was addressed by Consultation?</p>	<p><input checked="" type="checkbox"/> Agency - Managing Flood Prone Areas <input type="checkbox"/> Agency - Management of Public Land or Water Resources <input checked="" type="checkbox"/> Agency - Emergency Management</p>
	<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Consultation was done through a review of website and materials. The Department developed the Detroit Sustainability Action Agenda that works to achieve four outcomes, with Healthy, Thriving People placed firmly at the heart of our work and building out to include Affordable, Quality Homes; Clean, Connected Neighborhoods; and an Equitable, Green City. Across these outcomes, the City is committed to achieving 10 goals and implementing 43 actions to address many of the most pressing challenges facing Detroiters today. The Sustainability Agenda also focuses on addressing the vulnerability of housing occupied by low- and moderate-income households.</p>

49	Agency/Group/Organization	Detroit Homeland Security and Emergency Management (DHSEM)
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	<input checked="" type="checkbox"/> Agency - Managing Flood Prone Areas <input type="checkbox"/> Agency - Management of Public Land or Water Resources <input checked="" type="checkbox"/> Agency - Emergency Management
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	<p>Consultation was done through a review of website and materials. DHSEM coordinates with local, regional, state, federal, and private-sector agencies to protect the community from natural and human-made emergencies and disasters. The impact of climate change on Detroit's aging stormwater systems could lead to flooded basements and streets and sewage overflows into the Detroit River. It is important in responding to climate change and disasters that low-to-moderate income neighborhoods and housing that is most vulnerable are included and given priority.</p>
50	Agency/Group/Organization	Planning and Development (P&DD)
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	<input checked="" type="checkbox"/> Agency - Managing Flood Prone Areas <input checked="" type="checkbox"/> Agency - Management of Public Land or Water Resources <input type="checkbox"/>

<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Consultation was done through email and teleconference. P&DD coordinates with HRD and Detroit Land Bank Authority to manage the city's publicly owned land. The City sells surplus property to residents, community organizations, developers, and others for a variety of uses that provide public benefit and return the properties to productive use. P&DD manages neighborhood framework plans including long-term strategies for housing & retail development and parks & green stormwater infrastructure and the management of wetlands identified during the framework comprehensive studies.</p>
---	---

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 and 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).
Detroit Multi-family Affordable Housing Strategy 2018	City of Detroit	The affordable housing strategies align with the affordable housing goals of the Con Plan and the steps to reduce barriers to affordable housing
Strategic Neighborhood Fund 2.0	Invest Detroit	The affordable housing and community revitalization activities proposed for the fund align with the Con Plan goals for addressing housing and community development needs

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 Plans	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)

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l)).

The City of Detroit coordinates housing and community development funding and programs with the Michigan State Housing Development Organization (MSHDA) as it relates to homeless prevention and Continuum of Care (CoC) activities. The City in entering its fourth year of funding for Medicaid and Children’s Health Insurance Program (CHIP) from the Michigan Department of Health and Human Services (MDHHS). These funds are used to abate lead hazards in Detroit homes. The City also collaborates with MSHDA by providing HOME subsidies to projects receiving low-income housing tax credits from MSHDA. This consists of HOME assisted projects receiving 9% competitive tax credits and an allocation of 4% credits provided by MSHDA through the City’s Affordable Housing Leverage Fund (AHLF) which is administered by the Detroit office of Local Initiatives Support Corporation (LISC). The city works with Wayne County and other adjacent governmental entities to coordinate housing and community development initiatives.

Narrative (optional):

The Health Services Division is responsible for mobilizing Detroit Health Department resources and forming strategic partnerships to improve the health of children and families, who live, work and play in Detroit. The Division includes the following programs/services:

1. Children’s Special Healthcare Services
2. Vision and Hearing Screening

3. Lead Poisoning Prevention and Intervention

- Childhood Lead Poisoning Prevention Program (CLPPP)
- Early Child Care Integrated Service Delivery Model
- Universal Lead Testing /Clinician Engagement and School Based Testing

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.

AP-12 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

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

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, community survey, e-blast communication, and social media.

Participant comments were received through various means including the following: City of Detroit e-mail access, fax, regular mail, telephone, and during public hearings. Contacts included community organizations, federal, state, and local government information gleaned from interviews and the internet (online reports, program information, strategies, and studies). Affected groups these organizations assistance include youth, elderly, the disabled, persons with HIV/ AIDS, homeless, public housing residents, housing advocates, housing developers, data analysts, other grant funders, fair housing advocates, and other special needs advocates.

As a result, citizen input influenced the City's NRSA boundary selections by ensuring eligible areas within all seven districts were included in the NRSA boundaries. Residents were given multiple opportunities to comment on the plan before and after development using a variety of methods to allow citizens to provide input on the City's housing and community development needs for the next five years. Participation included virtual public meetings, social media, radio, email correspondences, City website postings, 30-day comment period, and online surveys. Residents and other stakeholders had the following opportunities to provide input to the Consolidated Plan/Annual Action Plan:

- *CDBG/NOF 2022-23 Subrecipient Workshops were held on August 26 and September 15, 2021 – 356 Participants*
- *ESG 2022-23 Subrecipient Workshops were held on March 23, April 16, and April 29, 2022 – 138 Participants*
- *Public Virtual Hearing Meeting #1 for the 2022-23 Annual Action Plan process was held July 13, 2022 – 21 Participants*
- *Public Virtual Hearing Meeting #2 for the 2022-23 Annual Action Plan process was held July 20, 2022 – 47 Participants*
- *The draft FY 2022-23 Annual Action Plan was published for a 30-day comment period from June 28 – July 28, 2022, with access to printed copies at community district locations and on the City's website.*

- *A Public Virtual Hearing and review and approval of the plan at the Detroit City Council Meeting was held on July 21, 2022 (for discussion) and July 26, 2022 (for approval)*

Housing and Community Development Needs Prioritization

Housing and community development needs were identified in the 2020-21 Annual Action Plan prioritized through community feedback from online surveys and meetings and the analysis of demographic and economic data provided by HUD and through the U.S. Census Bureau. Online and paper versions of a community stakeholder/resident survey and an agency survey were posted and distributed for about 3 months, longer than the standard 30 days because of delays due to the COVID-19 pandemic. The surveys requested information on housing and community development needs. There was a total of 200 responses including 157 community members (79%) and 43 agency representatives (21%).

Agencies participating in the survey provide services to 270,130 persons in the Detroit area. Of the 157-community stakeholder/resident survey respondents, 129 were residents and the remainder were business owners, landlords, community organizations, and other stakeholders. Participants were asked to rank housing and community development need categories overall and selected Housing, Businesses and Jobs, and Infrastructure as the 3 most important. On an activity level, when asked to rank activities as “High Need” or “Low Need.” High Need activities were defined as those on which federal block grants would be spent to address unmet needs. Low Need activities were those for which other government or private sector funding was available and needs were considered lower priority. The following are the activities selected as high priority needs.

- **Housing:** Owner Occupied Home Repair was selected the most as High Need, followed by Affordable Single-Family and Multi-Family Rental Housing. This was in line with data that showed 45 % of all Detroit households are housing cost burdened meaning paying more than 30% of their income on housing expenses. Additionally, Detroit’s housing stock is primarily single family, older, and more susceptible to issues such as lead paint and deferred maintenance.
- **Economic Development:** Employment Training was selected the most as High Need, followed by Job Creation/Retention and Start-Up Business Assistance. Demographic data analysis shows that education drives job access and income and only 12 % of Detroit residents have earned a bachelor’s or higher. Coupled with deindustrialization over the last 40 years resulting in high unemployment rates and the recent pandemic, economic development is imperative for the City.
- **Public Infrastructure & Neighborhood Activities:** Water/Sewer Improvements was selected the most as High Need, followed by Street and Sidewalk Improvements and Demolition of Substandard Structures. The city continues to make strides in this area but there is still more work to be done. For example, the City combats blight, estimating that 40,077 structures met the definition, but there are 80,000+ vacant housing units.

- **Community & Public Facilities:** Youth Centers was selected the most as High Need, followed by Child Care Centers and Community Centers. Data shows that Youth and Community Centers provide stability. Detroit currently has 15 Community Centers and survey respondents ranked it as a high need.
- **Public Services:** Mental Health Services was selected the most as High Need, followed by Transportation Services and Fair Housing. Overall, most public services were all highly ranked demonstrating the cities need for such services. For example, Detroit's elderly population is growing and attributed to a rise of residents with disabilities, currently 20% of the population.
- **Homeless Prevention:** Support Services for Homeless Prevention was selected the most as High Need, followed by Emergency Support Services, Emergency Shelters for Homeless Persons and Families, and Permanent Housing. Data showed that Detroit's chronically homeless population increased by 31%. As mentioned in Housing many Detroit residents are cost burdened, coupled with lower incomes impacting housing affordability, these residents may be in danger of or currently experiencing homelessness.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	CDBG/NOF and PFR 2022 Subrecipient Workshops	Non-profits	Questions centered around the application process, programs, and eligibility. 356 participants. Meeting dates: August 26 and September 15, 2021	See Appendix Citizen Participation section	All comments were accepted	https://detroitmi.gov/departments/housing-and-revitalization-department/hud-programs-and-information/hud-consolidated-plans
2	ESG 2022 Subrecipient Workshops	Non-profits	Questions centered around the application process, programs, and eligibility. 138 participants. Meeting dates: March 23, April 13 and 29, 2022	See Appendix Citizen Participation section	All comments were accepted	https://detroitmi.gov/departments/housing-and-revitalization-department/hud-programs-and-information/hud-consolidated-plans

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	Annual Action Plan Public Hearing #1 7/13/22	Non specified residents, community leaders	Presentation on draft 2022 Annual Action Plan and Budgets, Con Plan definitions. Action Plan Budget and Flood Disaster Recovery funds Meeting date: July 13, 2022 21 participants were in attendance	See Appendix Citizen Participation section	All comments were accepted	https://detroitmi.gov/departments/housing-and-revitalization-department/hud-programs-and-information/hud-consolidated-plans
4	Annual Action Plan Public Hearing #2 7/20/22	Non-specified – residents, community leaders	Presentation on draft Annual Action Plan, Con Plan definitions 2022-23 Action Plan Budget and Flood Disaster Recovery funds. 47 participants were in attendance	See Appendix Citizen Participation section	All comments were accepted	https://detroitmi.gov/departments/housing-and-revitalization-department/hud-programs-and-information/hud-consolidated-plans

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)
5	30-day public comment period 06/28-07/28/2022	Non-specified - citywide	Draft FY 2022-23 Annual Action Plan	Covered in comment section	(See Appendix Citizen Participation section)	https://detroitmi.gov/departments/housing-and-revitalization-department/hud-programs-and-information/hud-consolidated-plans
6	Public Hearing – Detroit City Council Committee (Discussion) 07/21/2022	Non-specified - citywide	Draft FY 2022-23 Annual Action Plan	None	N/A	https://detroitmi.gov/departments/housing-and-revitalization-department/hud-programs-and-information/hud-consolidated-plans
7	Public Hearing – Detroit City Council Committee (Approval) 07/26/2022	Non-specified - citywide	Draft FY 2022-23 Annual Action Plan	None	N/A	https://detroitmi.gov/departments/housing-and-revitalization-department/hud-programs-and-information/hud-consolidated-plans

Table – Citizen Participation Outreach

Action Plan

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

Introduction

The anticipated expected federal resources to carry out activities and projects during the program year are from the Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME), Housing Opportunities for Person with Aids Program (HOPWA) and Emergency Solutions Grant (ESG). Although the City of Detroit is not expected to receive any loan settlements from Section 108 loan guarantees or traditional program income in the coming year, in fiscal year 2021-22, the City did receive a total of \$12,985.72 in loan settlements. Last fiscal year, the city generated HOME Program Income in the amount of \$456,273.63. This fiscal year, the HOME Program Income is estimated at \$3,450,000 that will be available in the 2022-23 fiscal year. In addition, the city is expected to receive approximately \$1,172,084.66 of revolving loan proceeds from the 0% interest loan home repair program. These proceeds will be invested back into the program. The 2022 Fiscal Year awards are shown below:

Program	2022 Award
CDBG	\$34,525,687
HOME	\$ 7,489,290
ESG	\$2,986,626
HOPWA	\$ 3,239,696
Total	\$48,241,299

Based on the above allocations, the City of Detroit is expected to receive a total of \$48,241,299 from all HUD entitlement grant sources for the Action Plan. All funds have been allocated to meet the 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: Property Acquisition, Blight Removal and Demolition, Community Development, Economic Development, Public Service, Homeless Public Services, Public Facilities and Improvement, Owner-occupied Home Repair, Homebuyer Assistance, Rehabilitation of rental housing,

Relocation, and administrative and planning

Eligible HOME projects include: New Construction and Acquisition/Rehabilitation of multifamily and single rental housing, new construction and acquisition/rehabilitation of homebuyer housing, Homebuyer down payment and closing costs assistance, and Tenant Based Rental Assistance.

Eligible HOPWA activities include: Permanent 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, permanent housing

Expected Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 3				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services Historic Preservation	34,525,687	0	\$1,172,084.66	35,697,771.66	71,074,232	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 may be designated to perform relocation activities.

HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	7,489,290	3,450,000	456,273.63	11,395,563.63	14,248,022	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 3				Expected Amount Available Remainder of Con Plan \$	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	3,239,696	0.00	0.00	3,239,696	5,319,391	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) while providing information and supportive services.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 3				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	2,986,626	0.00	0.00	2,986,626	6,135,417	ESG funds will provide a 1 to 1 match with the CDBG Program and other in-kind contributions. 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 3				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Continuum of Care	public - federal	Admin and Planning Rapid re-housing (rental assistance) Rental Assistance TBRA Transitional housing Other	26,137,973*	0	0	26,137,973	104,551,892	<p>The Continuum of Care (CoC) Program is designed to promote communitywide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, and State and local governments to quickly re-house homeless persons; promote access to and utilization of mainstream programs by homeless persons; and optimize self-sufficiency among individuals and families experiencing homelessness.</p> <p>* This amount reflects 2019 Tier 1 funding. Additional 2019 Tier 2 funding may be awarded.</p>

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 3				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Strategic Neighborhood Fund	Private-corporate	Public facility improvements, commercial development, affordable housing development	130,000,000	0	0	130,000,000	N/A	A group of seven area banks and major corporations has pledged a total of \$35 million to fund community improvements in the City's ten (10) Strategic Neighborhood Fund areas. These funds will provide physical improvements to parks and streetscapes, commercial development, and affordable housing development through renovation of existing vacant units and new construction as needed.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 3				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Affordable Housing Leverage Fund	public - private	Affordable housing preservation and development	N/A	0	0	250,000,000	N/A	<p>The Affordable Housing Leverage Fund (AHLF) encourages the preservation of regulated and naturally occurring affordable housing throughout the City of Detroit and the development of new mixed-income and affordable housing in targeted multi-family housing areas. AHLF is expected to contribute to the goal of preserving 10,000 units of existing affordable housing and the development of 2,000 units of new affordable housing.</p> <p>AHLF will primarily invest in existing housing that is affordable to households at or below 60% of AMI and will seek to invest in homes that are available to households below 50% and 30% of AMI as well as permanent supportive housing.</p>

Table ## - Expected Resources

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

Leveraged Resources

It is well recognized that the amount of federal grants received is inadequate to address the housing and community development needs of the City's low- and moderate-income households and communities. The City of Detroit has pursued a deliberate strategy of seeking out other public and private sector partnerships to leverage its federal funds with private capital and other government sources to expand the impact of its grant funded activities. The various initiatives described below are how the City achieves its housing and community development goals.

1. Historic Tax Credits

The federal historic rehabilitation tax credit (HTC) program is an indirect federal subsidy to finance the rehabilitation of historic buildings with a 20 percent tax credit for qualified expenditures. These Federal tax incentives are used to stimulate private investment in the rehabilitation and reuse of historic structures.

2. The Michigan Low-Income Housing Tax Credit Program (LIHTC)

The Low-Income Housing Tax Credit Program is an investment vehicle created by the federal Tax Reform Act of 1986 to increase and preserve affordable rental housing. Administered by the Michigan State Housing Development Authority (MSHDA), this program permits investors in affordable rental housing to potentially claim a credit against their tax liability annually for a period of 10 years, bringing much needed private investment to affordable housing projects. Through the Affordable Housing Leverage Fund partnership, the city works closely with the Detroit office of the Local Initiatives Support Corporation (LISC) and the Michigan State Housing Development Authority (MSHDA) to leverage the city's finite resources to maximize the production and preservation of affordable units including projects receiving either 9% or 4% low-income housing tax credits from MSHDA. The following projects that applied for funding support from the City of Detroit in FY 2021 have also received awards of low-income housing tax credits from MSHDA: Greystone Senior (9% LIHTCs), Lee Plaza (9% LIHTCs), Benjamin O Davis Veterans (9% LIHTCs), CCSEM St. Mathew (9% LIHTCs), Orchard Village (9% LIHTCs), Grandmont Rosedale Collective II (4% LIHTCs), Merrill Place II (4% LIHTCs), Hubbard Farms (4% LIHTCs), and 5800 Michigan Avenue (4% LIHTCs).

3. Strategic Neighborhood Fund (SNF)

The Strategic Neighborhood Fund is a partnership between the City of Detroit, Invest Detroit, a local community development financial institution (CDFI), neighborhood residents, and philanthropic and corporate donors. The SNF was started with a \$35 million pledged from a group of seven area banks and major corporations to fund community improvements in the City's 10 (ten) Strategic Neighborhood Fund areas. SNF funds community-driven projects in four specific areas – park improvements, streetscape improvements, commercial corridor development, and affordable single-family home stabilization

through renovation of existing vacant units and new construction as needed. Each project begins by soliciting input from residents with support and oversight from the City's Planning and Development Department and the Department of Neighborhoods.

\$56 million in Philanthropic grants will be combined with \$59M in City funds and \$15M in State of Michigan funds for a total of \$130M. This funding commitment will attract an additional \$113M in equity and commercial debt for a grand total of \$243M in total investments to improving some of Detroit's most impacted communities.¹

4. The Preservation Housing Partnership

The City of Detroit Housing & Revitalization Department (HRD) has collaborated with six housing focused organizations to preserve and improve existing affordable housing throughout the City and prevent displacement of LMI residents due to gentrification and/or conversion of affordable units to market rate. Teaming up with organizations such as Cinnaire, Enterprise Community Partners, United Community Housing Coalition, Data Driven Detroit, Community Investment Corp., and others, this effort will focus on maintaining affordable units either through renewal of existing affordability commitments or through restructured financing mechanisms and will provide necessary renovations to ensure the availability of quality, long-term affordable units.

5. Affordable Housing Leverage Fund (AHLF)

Affordable housing is central to the City's inclusive growth strategy and plays a key role in the ability to retain existing residents, attract new residents, and create mixed-income communities. To address its affordable housing needs, the City's Housing & Revitalization Department (HRD) collaborated with Detroit LISC, the Michigan State Housing Development Authority (MSHDA), along with local financial institutions and foundations to create the Affordable Housing Leverage Fund (AHLF). The AHLF provide affordable housing developers and owners with streamlined access to financial products such as loans, grants, and guarantees that are specifically designed to address housing challenges in Detroit neighborhoods. AHLF encourages the preservation of regulated and naturally occurring affordable housing citywide and the development of new mixed-income and affordable housing in targeted multi-family housing areas. The City seeded the AHLF with \$50 million in CDBG, HOME, and general funds and intends to grow the fund with philanthropic and financial institutional support to \$250 million, which will unlock \$765 million in total investment. The AHLF is expected to preserve 10,000 units of existing affordable housing and the development of 2,000 units of new affordable housing.

AHLF primarily finances affordable multi-family rental housing; however, for-sale and single-family projects will be considered. AHLF will invest in housing that is affordable to households at or below 80% Area Median Income (with consideration of households up to 80% AMI for for-sale projects). Recognizing that housing cost burdens are a particularly acute challenge for Detroit residents at the lower end of the

¹ Strategic Neighborhood Fund. Retrieved September 23, 2020. <https://investdetroit.com/an-unprecedented-effort-to-strengthen-our-neighborhoods/>

income spectrum, AHLF will seek to invest in a significant number of homes that are available to households below 50% and 30% of AMI as well as permanent supportive housing.

6. Choice Neighborhoods

Following an 18-month community engagement period with Corktown residents and application submission in December 2020, on May 25, 2021, the City of Detroit was awarded \$30MM for the Choice Neighborhoods Implementation (CNI) Grant through HUD. The Choice Neighborhoods program leverages significant public and private dollars to support the implementation of a locally driven transformation plan in Greater Corktown designed to revitalize the neighborhood while preserving affordability and increasing access to opportunity for existing residents. Greater Corktown has a history of high vacancy and long-term disinvestment but has recently seen emerging development activity spurred by Ford Motor Company's investment in the former Michigan Central Station and surrounding area. The transformation plan will provide housing, amenities and direct services to residents of Clement Kern Gardens, the target housing site to be redeveloped, and will be implemented with ongoing input from resident council and community members.

To support long-term stabilization, the vision for the neighborhood involves creating 842 high-quality affordable and mixed income housing options, including 40 opportunities for homeownership across the income spectrum. 72 Housing Choice Vouchers (HCVs) have been secured through the Michigan State Housing Development Authority (MSHDA), 95 HCVs have been committed from the Detroit Housing Commission in the form of 87 tenant protection vouchers for Clement Kern Gardens residents and 7 Project Based Vouchers for the Left Field housing phase. The Housing Implementation Entity joint-venture will continue to seek additional HCVs to support the housing plan throughout the 6-year implementation period.

Targeted investments in the neighborhood, include four critical community improvements - CCIs. A Community Empowerment Center is being constructed in North Corktown to house critical people strategy supportive services and serve as a non-residential community anchor. The community hub will include neighborhood amenities such as an early childhood education (ECE) center and living lab/ outdoor classroom. Street calming, pedestrian safety, and placemaking improvements will be brought to several major corridors to create safer intersections, better circulation and landscaping. Safe pedestrian pathways will be designed that overlay art interventions along streetscape improvements that promote neighborhood identity and connectivity to new and existing neighborhoods amenities along Michigan Avenue, Bagley, and 14th Streets. Improvements will help connect families to destinations within the neighborhood and the City including Roosevelt and Wilson Centennial Parks. The 10th Street Greenway and wayfinding are designed to fulfill the neighborhood objective to create new and improved public spaces that are safer, more welcoming, and offer an array of services and amenities for residents. Residents are encouraged to spend more time outside, be more active, and increase interactions between those of different socioeconomic circumstances and racial makeup. To reduce environmental challenges such as runoff and flooding across the neighborhood and within planned housing developments green infrastructure and active landscapes will be integrated into the transformation plan.

Case management and supportive services in the areas of health, education, and economic self-sufficiency will be provided for Clement Kern Gardens households, the target housing site for the CNI grant. The City's Housing and Revitalization and Planning and Development Departments are implementing the grant and plan to support neighborhood and housing initiatives within the plan through CDBG and HOME investments. CDBG invested in the Community Empowerment Center will help to promote a suitable living environment in Greater Corktown by addressing non housing community development needs through the creation of a new community and public facility – aligning with goal 4 in the City's 20-24 Con Plan. CDBG invested in the green infrastructure also promotes a suitable living environment in Greater Corktown through improved neighborhood conditions through water/sewer improvements, street and sidewalk improvements by bolstering public infrastructure and neighborhood activities, aligning with goals 6 and 7 in the City's 20-24 Con Plan. Much of the development taking place in North Corktown overlaps with the NRSA 3 boundaries, and investment supported by CDBG will be in place by 2024. There is potential for infrastructure investments made to support the development of housing to spur further revitalization within the Greater Corktown neighborhood.

Matching Requirements

The Emergency Solutions Grant Program (ESG) requires a 100% match on each year's award amount. To aid in meeting this requirement, the City provides CDBG grants to homeless services organizations receiving ESG to fund a portion of the match requirement. The remaining ESG match requirement is met by the 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. The matching requirement for HOME dollars may vary and is set annually by HUD based on criteria related to severe fiscal distress. Currently, the City of Detroit does not have a matching requirement for the HOME program and has not for several years. For FY 2021, the City of Detroit met the HUD criteria for severe fiscal distress and was granted a 100% reduction in the match requirement. This match reduction applies to FY 2022 HOME funds as well. The City will qualify for similar match reductions in future years due to recovery from severe fiscal distress.

The City of Detroit and non-profit community organizations also receive funding from other federal government agencies, the State of Michigan, philanthropic private foundations, and lending institutions as leveraging resources that may be used to assist in meeting the needs identified in this plan.

If appropriate, describe publicly 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 that may be used for public service activities funded under the various HUD programs.

The City of Detroit has a land bank authority that is responsible for returning the city's many blighted and vacant properties to productive and valuable use. The land bank maintains the City's publicly owned

parcels and acquires additional foreclosed/abandoned property and vacant lots. The City then addresses these properties through demolition, rehabilitation, and disposition to help stabilize neighborhood decline. For eligible properties, the land bank authority utilizes a variety of sales programs to offer homes to residents, such as the Community Partner Program, Auctions, Own-It-Now, Rehabbed & Ready and the Residential Side Lot program. Additionally, the City has some select land parcels, owned by the City of Detroit that will be sold for new housing construction projects.

Since 2019, several large philanthropic organizations, including The Erb Family Foundation, and The Kresge Foundation have awarded over \$3.1 million in much needed funding to Detroit Future City (DFC) in support of its efforts to promote the advancement of land use and sustainability, and community and economic development, including its Working With Lots program. This program provides technical assistance and grants to community-based organizations working to sustainably repurpose vacant land in Detroit residential neighborhoods. Since 2019, DFC has awarded more than \$97,000 to community groups, faith-based institutions, non-profits, and businesses to install one of 38 lot designs to activate community spaces, address stormwater concerns, and create neighborhoods that are more attractive. 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

See above.

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	2022	2023	Homeless	City-Wide	Increase in affordable housing options Homeless Prevention Rental Assistance Homeless Outreach Emergency Shelter and Transitional Housing Rapid Re-housing	CDBG: \$2,589,426.50 ESG: \$2,986,626 CoC: \$26,137,973	Tenant-based rental assistance / Rapid Rehousing: 3,300 Households Assisted All "Extremely Low" income benefit Homeless Person Overnight Shelter: 2,800 Persons Assisted All "Extremely Low" income benefit Overnight/Emergency Shelter/Transitional Housing Beds added: 270 Beds All "Extremely Low" income benefit Homelessness Prevention: 2,500 Persons Assisted All "Extremely Low" income benefit Homeless Outreach: 900 Persons Assisted All "Extremely Low" income benefit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Rehabilitation of Existing Housing Units	2022	2023	Affordable Housing rehabilitation of existing housing units	City-Wide NRSA	Rental Assistance Production of new housing units Rehabilitation of existing units Acquisition Rehabilitation of Existing Units incl 0% loan and Sr. Home Repair programs and Lead Remediation Development of Permanent Supportive Housing	HOME: \$7,489,290 CDBG: \$1,000,000 CDBG: \$5,839,893	Rental units constructed: 215 Household Housing units Homeowner Housing Rehabilitated: 285 Household Housing Units 20% extremely low; 40% low; 35% low/mod; 5% middle income Rental Units rehabilitated: 250 Household Housing Unit; 20% extremely low; 40% low; 35% low/mod; 5% middle Acquisition

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
								Acquisition of existing units: TBD Household Housing Units Permanent Supportive Housing units constructed: TBD Household Housing Units
3	Homeownership Program	2022	2023	Affordable Housing	City-Wide NRSA	Down Payment Assistance Increase Home ownership opportunities	CDBG: \$1,300,000	Loans Provided: 215 Household Housing Units Assisted; 20% low; 75% low/mod; 5% middle income
4	Public Services Activities for Citizens of Detroit	2022	2023	Public Service Summer Youth Employment	City-Wide NRSA	Public Services Activities Job/Job Training	CDBG: \$2,589,426.50 CDBG: \$1,500,000	Public Service activities: 22,643 Person assisted 800 Youth assisted
5	Econ Dev (Creation of	2022	2023	Non-Housing Community Development	City-Wide NRSA Areas	Economic Development Jobs/Small Business	CDBG: \$0	Businesses assisted: TBD Jobs created and/or retained

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
	Jobs/Small Businesses)							
6	Sustain Infrastructure and Public Improvements	2022	2023	Non-Housing Community Development	City-Wide	Public Improvement & Infrastructure	CDBG: \$2,747,567	Other: TBD residents of LMA served
7	Public Facilities and Improvements	2022	2023	Non-Housing Community Development	City-Wide	Public Facilities	CDBG: \$1,000,000	Other: 2 Public Facilities 900 residents of LMA served 400 community benefit
8	Econ Dev (Commercial Rehab)	2022	2023	Non-Housing Community Development	City-Wide	Jobs/Small Business	CDBG: \$0	Businesses assisted: 0 Commercial Façade/Businesses Assisted
9	Blight removal and demolition	2022	2023	Demolition	City-Wide	Demolition Clearing Acquisition of Existing Units	CDBG: \$0	Buildings Demolished: TBD Structures (includes schools, commercial and residential properties)

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
10	Section 108 Repayment	2022	2023	Non-Housing Community Development	City-Wide	Economic Development	CDBG: \$4,857,774	Businesses assisted: 5 Businesses Assisted
11	Help those with special needs (non-homeless)	2022	2023	Non-Homeless Special Needs	City-Wide	Public Services Homeless Prevention	HOPWA: \$3,234,696	HIV/AIDS Housing Operations including Tenant-based rental assistance: 225 Household Housing Units
12	Other: Relocation	2022	2023	Non-Housing Community Development	City-Wide	Relocation of Displacement residents	CDBG: 0	These outcomes will be determined based on Annual Action Plan goals and funding
13	Other: Residential Historic Preservation	2022	2023	Housing Rehabilitation	City-Wide	Rehabilitation of Existing Units	CDBG: \$0	Number of individuals or households TBD Persons or Households Assisted
14	Other: Interim Assistance	2022	2023	Non-Housing Community Development	City-Wide	Emergency conditions threatening health and safety	CDBG: TBD	Number of individuals or households TBD

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
15	CDBG Planning and Administration	2022	2023	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	City-Wide	N/A	CDBG: 6,905,137	Other
16	CDBG Housing Rehabilitation Activity Delivery Cost	2022	2023	Affordable Housing	City-Wide	Rehabilitation of existing owner-occupied units Increase in affordable rental housing options Increased homeownership opportunities	CDBG: 3,694,242	Other

AP-20 Annual Goals and Objectives

Goals Summary Information

Table – Goals Summary

Goal Descriptions

1	Goal Name	Reduce homeless citizens in City of Detroit
	Goal Description	<p>Tenant-based rental assistance / Rapid Rehousing: 3,300 Households Assisted All “Extremely Low” income benefit Homeless Person Overnight Shelter: 2,800 Persons Assisted All “Extremely Low” income benefit.</p> <p>Overnight/Emergency Shelter/Transitional Housing Beds added: 270 Beds All “Extremely Low” income benefit</p> <p>Homelessness Prevention: 2,500 Persons Assisted All “Extremely Low” income benefit</p> <p>Homeless Outreach: 900 Persons Assisted All “Extremely Low” income benefit</p>
2	Goal Name	Rehabilitation of Existing Affordable Housing
	Goal Description	<p>Affordable Housing units; rehabilitation of existing units</p> <p>Rental assistance, production of new units. Rehabilitation of existing units, rapid re-housing. Zero percent interest loan program, SEHR, Lead</p> <p>Rental units constructed: 215 Household Housing units</p> <p>Homeowner Housing Rehabilitated:</p> <p>285 Household Housing Units: 20% extremely low; 40% low; 35% low/mod; 5% middle income</p> <p>Rental Units rehabilitated: 250 Household Housing Unit: 20% extremely low; 40% low; 35% low/mod; 5% middle</p> <p>Acquisition of existing units: TBD Household Housing Units</p> <p>Development of Permanent Supportive Housing: TBD Household Housing Units</p>
3	Goal Name	Homeownership Program
	Goal Description	<p>Homeownership Down Payment Assistance</p> <p>Loans Provided: 215 Household Housing Units assisted; 20% low; 75% low/mod; 5% middle income</p>
4	Goal Name	Public Services Activities for Citizens of Detroit

	Goal Description	Public services activities to benefit Citizens of City of Detroit.
5	Goal Name	Econ Dev (Creation of Jobs/Small Businesses)
	Goal Description	Small business help and retain/creation of jobs and provide necessary goods and services to low-income neighborhoods
6	Goal Name	Sustain Infrastructure and Public Improvements
	Goal Description	Public Improvement & Infrastructure
7	Goal Name	Public Facilities and Improvements
	Goal Description	Public facilities and improvements for citizens of the City of Detroit.
8	Goal Name	Econ Dev (Commercial Façade Rehab)
	Goal Description	Facade treatment/ business building rehabilitation
9	Goal Name	Blight removal and demolition
	Goal Description	Blight removal within the City of Detroit. Demolition of abandoned and dangerous structures. CDBG funding will focus on commercial structures and residential structures.
10	Goal Name	Section 108 Repayment
	Goal Description	Repayment of Section 108 loans on development Projects
11	Goal Name	Help those with special needs (non-homeless)
	Goal Description	Help those with special needs
12	Goal Name	Address relocation of displaced residents
	Goal Description	Relocation of displaced residents
13	Goal Name	Residential Historic Preservation

	Goal Description	Rehabilitation of Existing Units
14	Goal Name	Provide interim assistance to address emergency conditions
	Goal Description	The City will provide funding for interim assistance to address emergency conditions that threaten public health and safety or to stop physical deterioration when immediate action is necessary
15	Goal Name	CDBG Planning and Administration
	Goal Description	Planning and Administration for staff costs related to the implementation of CDBG activities
16	Goal Name	CDBG Housing Rehabilitation Activity Delivery Cost
	Goal Description	CDBG Housing Rehabilitation Activity Delivery Cost for staff costs related to Housing rehabilitation activities
17	Goal Name	Construction of Housing
	Goal Description	Construction of Housing affordable housing units
18	Goal Name	Debt Service Reserve
	Goal Description	Debt Service Reserve for Section 108 escrow account
19	Goal Name	Clean up of Contaminated Sites
	Goal Description	Clean up of Contaminated Sites
20	Goal Name	Privately Owned Utilities
	Goal Description	Privately Owned Utilities

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

Affordable housing services are provided to extremely low-income, low-income, and moderate-income families living in the City of Detroit, with priority given to strategic areas and other Investment Strategy

initiatives (see Annual Goals and Objective chart above for percentages). These initiatives draw on market information and physical conditions analysis embedded in Detroit Future City's Framework Zones to help guide investment of limited resources and identify areas with the greatest potential for sustainability and reinvestment.

HRD's overall housing objectives include lead hazard reduction, home repair, new housing units, and rental. Under the HOME Investor Loan program, we anticipate 160 rental units will be developed.

AP-35 Projects – 91.220(d)

Introduction

The activities described in the 2022 Action Plan, reflect the City's highest priorities and goals. Housing Development, including Single-Family Home Rehabilitation, 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. For Fiscal Year 2022-23, the projects are listed below:

Projects

#	Project Name
1	ADMINISTRATION AND PLANNING (ADM/PLN)
2	HOUSING REHABILITATION HOME REPAIR (HR) & LEAD REMEDIATION
3	HOUSING PRE-DEVELOPMENT COSTS (AFFORDABLE HOUSING) AND DIRECT HOMEOWNER ASSISTANCE
4	PUBLIC FACILITY REHABILITATION AND PUBLIC IMPROVEMENT (PFR)
5	PARK IMPROVEMENTS AND NEIGHBORHOOD FACILITIES (PRK/NEIGH)
6	PUBLIC SERVICE (PS)
7	SECTION 108 LOANS (REPAY)
8	HOMELESS PUBLIC SERVICE (HPS)
9	CONSTRUCTION OF HOUSING
10	DEBT SERVICE RESERVE
11	RELOCATION
12	CLEANUP OF CONTAMINATED SITES
13	PRIVATELY OWNED UTILITIES
14	ECONOMIC DEVELOPMENT
15	HOME Assisted Housing (HOME) (2022)
16	ESG22 Detroit (2022)
17	HOPWA 2022 City of Detroit MIH22F001
18	CDBG HOUSING ACTIVITY DELIVERY

Table - Project Information

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 and HOPWA) prioritized investment based on a combination of needs, development activities, and the ability to carry out projects. For fiscal year 2022-23, priorities are listed below:

* Housing Rehabilitation

- 0% interest loan program
- Senior Emergency Home Repair

Lead Hazard Reduction Programs* 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

* Residential Historic Preservation

* Homeownership Assistance

* Relocation

* Cleanup of Contaminated Sites

(A complete list of the City's priorities is indicated in 2020-24 Consolidated Plan, SP-25 Priority Needs)

As discussed in the 2020-2024 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 the increase costs of providing services to the city's residents.

AP-38 Project Summary

Project Summary Information

1	Project Name	ADMINISTRATION AND PLANNING (ADM/PLN)
	Target Area	City-Wide
	Goals Supported	CDBG Planning and Administration
	Needs Addressed	Rehabilitation of existing owner-occupied units Increase in affordable rental housing options Increased homeownership opportunities Expand economic development opportunities Increased employment training - public services Increase Public Improvement & Infrastructure Increased Community and Public Facilities Increased Public Services Demolition and Clearance Homeless Prevention Emergency Shelter and Transitional Housing Rapid Re-housing Permanent Housing
	Funding	CDBG: \$6,750,608
	Description	Planning and Administration for staff costs related to the implementation of CDBG activities
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	N/A

	Location Description	N/A
	Planned Activities	N/A
2	Project Name	HOUSING REHABILITATION HOME REPAIR (HR) & LEAD REMEDIATION
	Target Area	City-Wide NRSA Areas Slums and Blight Designation
	Goals Supported	Rehabilitation of Existing Affordable Housing
	Needs Addressed	Rehabilitation of existing owner-occupied units
	Funding	CDBG: \$5,839,893
	Description	Zero interest loans to eligible low- and moderate-income homeowners including service delivery staff cost for housing rehabilitation that will be leveraged with other sources of funds to create greater impact and leveraging. Also, includes emergency home repair grants for seniors, lead remediation and Acquisition Rehabilitation. The amount includes P.I. from 0% interest loan in the amt of \$1,161,582 that will be invested back into the program
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	535 low and low-moderate families
	Location Description	City Wide, NRSA and Slums and Blighted
	Planned Activities	see above
3	Project Name	HOUSING PRE-DEVELOPMENT COSTS (AFFORDABLE HOUSING) AND DIRECT HOMEOWNER ASSISTANCE
	Target Area	City-Wide
	Goals Supported	Rehabilitation of Existing Affordable Housing Homeownership Program CDBG Housing Rehabilitation Activity Delivery Cost Construction of Housing Clean up of Contaminated Sites

	Needs Addressed	Rehabilitation of existing owner-occupied units Increase in affordable rental housing options Increased homeownership opportunities
	Funding	CDBG: \$3,241,898
	Description	Pre-development cost for the rehabilitation and new construction of publicly/privately owned properties for Detroit low and moderate income residents, including affordable housing direct homeownership assistance
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	215 Low and moderate families
	Location Description	City-wide
	Planned Activities	see above
4	Project Name	PUBLIC FACILITY REHABILITATION AND PUBLIC IMPROVEMENT (PFR)
	Target Area	City-Wide
	Goals Supported	Increase in Public Facilities and Improvements Residential Historic Preservation
	Needs Addressed	Increase Public Improvement & Infrastructure
	Funding	CDBG: \$1,000,000
	Description	Public Facility Rehabilitation of Public Facilities buildings that operates Public Service activities. Also, including Public Improvements/Parks and sustain infrastructure
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	City-wide

	Planned Activities	see above
5	Project Name	PARK IMPROVEMENTS AND NEIGHBORHOOD FACILITIES (PRK/NEIGH)
	Target Area	City-Wide
	Goals Supported	Sustain Infrastructure and Public Improvements Increase in Public Facilities and Improvements
	Needs Addressed	Increase Public Improvement & Infrastructure
	Funding	CDBG: \$2,747,567
	Description	5% grant match requirement of the \$30MM Choice Neighborhood Initiative to provide affordable housing and critical community improvement projects w/in the City's Greater Corktown Neighborhood area/ GSD Park Improvements and playground improvements (TBD)
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	n/a
	Location Description	city-wide
	Planned Activities	see above
6	Project Name	PUBLIC SERVICE (PS)
	Target Area	City-Wide NRSA Areas
	Goals Supported	Public Services Activities for Citizens of Detroit
	Needs Addressed	Increased employment training - public services Increased Public Services
	Funding	CDBG: \$4,089,426
	Description	Public Service activities including NRSA Summer Youth Employment
	Target Date	6/30/2023

	Estimate the number and type of families that will benefit from the proposed activities	23,443 individuals
	Location Description	City-wide and NRS
	Planned Activities	see above
7	Project Name	SECTION 108 LOANS
	Target Area	City-Wide
	Goals Supported	Section 108 Repayment
	Needs Addressed	Expand economic development opportunities
	Funding	CDBG: \$4,857,774
	Description	Repayment of Section 108 Loans
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	see above
8	Project Name	HOMELESS PUBLIC SERVICE (HPS)
	Target Area	City-Wide
	Goals Supported	Reduce homeless citizens in City of Detroit Provide interim assistance to address emergency
	Needs Addressed	Homeless Prevention Emergency Shelter and Transitional Housing Rapid Re-housing Permanent Housing

	Funding	CDBG: \$2,589,426 ESG: \$2,986,626 Continuum of Care: \$26,137,973
	Description	Public Service programs for the homeless
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	8,600 low and extremely low
	Location Description	city-wide
	Planned Activities	see above
9	Project Name	CONSTRUCTION OF HOUSING
	Target Area	City-Wide
	Goals Supported	Construction of housing
	Needs Addressed	Increase in affordable rental housing options Increased homeownership opportunities
	Funding	CDBG: \$0
	Description	Construction of Housing affordable housing units
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	see description
10	Project Name	DEBT SERVICE RESERVE
	Target Area	City-Wide
	Goals Supported	Debt Service Reserve

	Needs Addressed	Expand economic development opportunities
	Funding	CDBG: \$0
	Description	Debt Service Reserve for Section 108 repayment activities
	Target Date	N/A
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	CITY-WIDE
	Planned Activities	see description above
11	Project Name	RELOCATION
	Target Area	City-Wide
	Goals Supported	Address relocation of displaced residents
	Needs Addressed	Homeless Prevention
	Funding	CDBG: \$0
	Description	Address relocation of displaced residents
	Target Date	N/A
	Estimate the number and type of families that will benefit from the proposed activities	TBD
	Location Description	City-Wide
	Planned Activities	see above
12	Project Name	CLEANUP OF CONTAMINATED SITES
	Target Area	City-Wide
	Goals Supported	Blight removal and demolition Cleanup of Contaminated Sites
	Needs Addressed	Rehabilitation of existing owner-occupied units Increase in affordable rental housing options

	Funding	CDBG: \$0
	Description	Cleanup of contaminated sites for rehabilitation projects
	Target Date	N/A
	Estimate the number and type of families that will benefit from the proposed activities	TBD
	Location Description	City-Wide
	Planned Activities	see above description
13	Project Name	PRIVATELY OWNED UTILITES
	Target Area	City-Wide
	Goals Supported	Privately Owned Utilities
	Needs Addressed	Rehabilitation of existing owner-occupied units Increase in affordable rental housing options Increased homeownership opportunities
	Funding	CDBG: \$0
	Description	Remove or reconstruct privately owned utilities for rehabilitation projects
	Target Date	N/A
	Estimate the number and type of families that will benefit from the proposed activities	TBD
	Location Description	City-Wide
	Planned Activities	see above
14	Project Name	ECONOMIC DEVELOPMENT
	Target Area	City-Wide
	Goals Supported	Econ Dev (Creation of Jobs/Small Business Asst.) Econ Dev (Commercial Facade Rehabilitation)
	Needs Addressed	Expand economic development opportunities
	Funding	CDBG: \$0

	Description	Economic development activities
	Target Date	N/A
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	City-Wide
	Planned Activities	see above
15	Project Name	HOME Assisted Housing (HOME) (2022)
	Target Area	City-Wide
	Goals Supported	Rehabilitation of Existing Affordable Housing
	Needs Addressed	Rehabilitation of existing owner-occupied units Increase in affordable rental housing options Increased homeownership opportunities
	Funding	HOME: \$7,489,290
	Description	Affordable housing rehabilitation including rental units constructed. The amount includes estimated Home Program Income for FY 2022-23 \$3,450,000.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	TBD
	Location Description	City-Wide
	Planned Activities	see above description
16	Project Name	ESG22-Detroit (2022)
	Target Area	City-Wide
	Goals Supported	Reduce homeless citizens in the City of Detroit

	Needs Addressed	Homeless Prevention Emergency Shelter and Transitional Housing Rapid Re-housing Permanent Housing
	Funding	ESG: \$2,986,626
	Description	ESG Activities includes Administration, Emergency Shelter, Outreach, Rapid Re-housing, Homeless Prevention and Data Collection.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	5,800 extremely low-income families
	Location Description	City-Wide
	Planned Activities	see above
17	Project Name	HOPWA 2022 City of Detroit MIH22F001
	Target Area	City-Wide
	Goals Supported	Assist special needs (non-homeless) populations
	Needs Addressed	Homeless Prevention
	Funding	\$3,239,696
	Description	HOPWA administration and short-term emergency/transitional housing including rental assistance, supportive/informational services for clients who may or may not be medically fragile but who have and HIV/AIDS diagnosis.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	225 presumed benefit families
	Location Description	CITY-WIDE
	Planned Activities	see above
	Project Name	CDBG HOUSING ACTIVITY DELIVERY

18	Target Area	City-Wide NRSA Areas Slums and Blight Designation
	Goals Supported	Rehabilitation of Existing Affordable Housing CDBG Housing Rehabilitation Activity Delivery Cost
	Needs Addressed	Rehabilitation of existing owner-occupied units Increase in affordable rental housing options
	Funding	\$3,694,242
	Description	CDBG housing rehabilitation activity delivery staffing costs
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	see above

Affordable Housing

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

The City of Detroit received approval from HUD for the renewal of five areas as Neighborhood Revitalization Strategy Areas (NRSAs) to focus its investment on neighborhoods that meet the NRSA criteria. The NRSA Plan is designed to use Community Development Block Grant funds in new ways. The plan includes strategies intended to build market confidence in Detroit neighborhoods by stabilizing housing stock, increasing home values, growing small businesses, preparing our youth for future employment, and building wealth for Detroit families. The following is a description of the five NRSAs within the City of Detroit:

NRSA 1

Located on the City's Southeast side. While there is an increase in near-term and long-term investment, NRSA 1 shares a 75 percent LMI rate. NRSA1 is home to the FCA Mack Engine Plant, the Marina District and NRSA1 makes up three (3) SNF neighborhoods, which include the Jefferson Chalmer neighborhood, East Warren/Cadieux, and Islandview/Greater Villages neighborhoods. In addition, two (2) Housing Resource Centers are currently working within the NRSA 1 boundaries. The boundaries are Mt. Elliott, McNichols, Cadieux, and Gratiot Ave.

NRSA 2

Located on the City's Northeast side. This NRSA includes the Jane Lasky Park and Recreation Center, Regent Park, and the Osborne Neighborhood. This NRSA includes two expanded SNF neighborhoods, which include the Gratiot/7-Mile SNF neighborhood and the Campau/Banglatown neighborhood. The City intends to invest in the following near-term projects over the next 3-5 years, including but not limited to: housing rehabilitation and small businesses. The boundaries are: 8 Mile Road, Moross, Edsel Ford Freeway, I-75 Freeway, and Caniff St.

NRSA 3

Located in Southwest Detroit. NRSA 3 contains several historic neighborhoods such as Virginia Park, and the southern portion of the Boston Edison neighborhood. In addition, the area includes the Springwell neighborhood and Mexicantown. The Southwest Vernor SNF is also nestled within this NRSA. Substantial investment, both long-term and near-term include park renovations to Clark Park, multi-family construction, streetscape improvements and demolition. Additionally, two (2) Housing Resource Centers are currently located within the NRSA 3 boundaries. The boundaries are Jefferson Ave., Springwells St., Elmhurst and Woodward Ave.

NRSA 4

Located in the southeastern part of Detroit. This area includes the Warrendale/Cody Rouge SNF neighborhood and is close in proximity to the Rouge Park. The City intends to leverage both private and public funds into greenway projects that will connect neighborhoods to the Rouge Park. The boundaries are Jeffries Freeway, Trinity St., Ford Road and Hubbell St.

NRSA 5

Located on the City's Northwest side. NRSA 5 makes up a 72 percent LMI rate and includes the Northwest Grand River SNF neighborhood, the Livernois – McNichols neighborhood and the historic Grandmont-Rosedale neighborhood. Population numbers for the Northwest Detroit area have declined – however, rates of loss are slowing down. Between 2010 – 2014, Northwest Detroit showed a population rate decrease of over 1.6 percent; however, projections show a rate of .90 percent predicted for 2016-2021. The City's near-term investment plans for this area includes adaptive reuse, historic preservation, streetscape & mobility improvement, and commercial corridor revitalization. The boundaries are: 8 Mile Road, Livernois Ave, I-96 Freeway and the east near Livernois Ave.

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. Cody Rouge and Warrendale - Bounded by Rouge Park, Fullerton/I-96 to the North, Southfield Freeway (incl. east of Southfield freeway at Tireman), and the City boundaries to the South.

Area 2- Located on the southwest side of Detroit. Delray - Bounded by I-75 North, E. Grand Blvd, Jefferson, and Rouge River.

Area 3- Located on the east side of Detroit. Conant-Davison - Bounded by Davison and McNichols to the North, Mt Elliot, and City boundary with Hamtramck/Highland Park to the South and West.

Geographic Distribution

Target Area	Percentage of Funds
City-Wide	89
NRSA's	10
Slum and Blight Areas	1

Table - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Most Detroit's targeted investments will benefit low- and moderate-income people or low- and moderate-income areas. City-wide targeting considers that 83 percent of the City's block groups have 51 percent or more low- and moderate-income residents. Renewal of the NRSAs are complete. 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 part of a single structure for the purposes of applying the low-and moderate- income national objective criteria. If 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, may be exempt from the aggregate public benefit standards, thus increasing a 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 \$1.5 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.
- Zero Interest Loan Program: Grant funds of 3 million will be leveraged with other sources of funds to create greater impact & leveraging. In addition to loan funds available City-wide, CDBG funds is available for housing rehabilitation loans in NRSA's

- Motor City Match/Restore program is vital to Detroit small businesses with funds over 1.5 million (funded from the city's general fund). The program assists businesses with technical assistance, improving facade exteriors/landscaping. It is increased economic opportunities with job growth within the city and NRSA's

The City of Detroit launched Investment Strategy Initiatives designed to revitalize declining areas within the City. Three areas meet 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 82 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, Affordable Housing Leverage Fund (AHLF), and Strategic Neighborhood Fund (SNF) 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 (in the Appendices) for NRSA and Slum & Blight areas.

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), Community Development Block Grant CARES Act (CDBG-CV), 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, CDBG-CV 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, CDBG-CV 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. The City received \$2M from HUD's Office of Lead Hazard Control and Healthy Homes (OLHCHH) which will be used over the next 3 years to address priority healthy homes hazards.

HRD, in partnership with community partners and local Community Development Financial Institutions (CDFI), funds the Zero Percent Interest Home Repair Loan Program with CDBG funds, providing loans up to \$25,000 to assist Detroit homeowners with Home Repairs. HRD also funds its Senior Emergency Home Repair Program with CDBG and, in some instances, with General Funds. These funds are used to serve low-to-moderate income seniors who own their home with emergency rehabilitation needs such as roofs, furnaces and hot water heaters. In addition, the City of Detroit funds a Lead Hazard Reduction Program serving low-to-moderate income households with children under the age of 6. This includes funding from HUD's Office of Lead Hazard Control and Healthy Homes (OLHCHH) as well as CDBG funds. The City of Detroit was awarded \$4.1 million (\$3.5M in Lead Hazard Reduction (LHR), \$600,000 in Healthy Homes Supplemental from the HUD's OLHCHH in January of 2019. Implementation of the program began July of 2019. These funds will address lead-based paint hazards in up to 200 single-family owner-occupied &

rental-occupied units, and the program is offered city-wide for over 3.5 years. In 2018, the City also received an additional \$1.2 million annually for up to 5 years serving up to 30 units annually with lead-based paint hazard reduction in the City’s top six zip codes with children with elevated blood lead levels (EBLL). This program is funded through the Michigan Department of Health and Human Services (MDHHS) through the Medicaid Children's Health Insurance Program (CHIP). In October 2019, the City of Detroit was awarded \$9.7 million from HUD’s OLHCHH High Impact Neighborhood Grant to target 4 contiguous census tracts in Southwest Detroit (48209 zip code) and eliminate lead-based paint hazards in single family and multi-family units both owner-occupied and tenant occupied. The City is expected to serve up to 455 units over the next 5 years.

In FY 2022-2023 the City will use a clear and consistent application process to evaluate and select housing rehabilitation and new construction projects to meet the established program goals (for example in geographically targeted areas of the City). HRD will continue to utilize the Targeted Multifamily Housing Areas Map to assist in making 2022-2023 HOME NOFA investment decisions. The City will seek to leverage HOME, CDBG, CDBG-CV and other local funds with other funding sources such as Low-Income Housing Tax Credits, Historic Tax Credits, grants and federal and state affordable housing financing programs and support projects that will create and enhance stable communities where other services are provided.

Goals for investing in rehabilitated and newly constructed housing in 2022-2023 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
- The preservation of existing multifamily affordable housing, the creation of new multifamily affordable housing for extremely low-income, very low-income, low-income and moderate income households and the renovation of homes for purchase by low-income and moderate income households.

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	45
Non-Homeless	785
Special-Needs	225
Total	1055

Table - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	270
The Production of New Units	300
Rehab of Existing Units	485
Acquisition of Existing Units	0
Total	1055

Table - One Year Goals for Affordable Housing by Support Type

Discussion

1. HOME: In the 2022-2023 fiscal year, HOME funds will be targeted to strategic areas in the City through a Notice of Funding Availability (NOFA) process. In addition to the priorities discussed above, HOME funds will also be prioritized to create or maintain affordability for projects in areas with lower vacancy, strong real estate markets and 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 complete the rehabilitation of 85 units and the construction of another 300 rental units for low-income, very low-income, extremely low-income, and moderate income households. The completed projects will include funding from other sources such as Low-Income Housing Tax Credits, Historic Tax Credits, private equity, grants and local, federal and state affordable housing financing programs to accomplish 8 times the amount of development activity for each dollar of support provided by the HOME program. Also, HRD expects the rehabilitation of an additional 195 units and construction of another 920 rental units for low-income, very low-income, extremely low-income, and moderate income households will be in process during the 2022-2023 fiscal year. These projects will also leverage the other funding sources indicated above to accomplish over 10 times the amount of development activity for each dollar of HOME funds invested in supporting the projects.

2. CDBG Rehabilitation: HRD's 2022-2023 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 2022-2023, 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 Interest 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, when available, and CDBG-CV 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 250 homeowners will be assisted with an approximate expenditure of \$15,000 per home.
- Zero Percent Interest 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. 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 \$4.1 million in LHR funds in January 2019. Program period of performance began April 1, 2019 and continues through September 30, 2023 (42 Months, extended 12 months). 200 units are expected to be served over the four-and-a-half-year period. HRD was awarded \$9.7MM in October 2019. Program period of performance began January 2020 through May, 1, 2024 (60 Months, extended 5 months). 455 units are expected to be served over the five-year period. HRD was awarded \$1.2 million annually for up to five years from MDHHS CHIP Program, serving up to 30 units annually. CDBG funds are used to match the HUD OLHCHH funding as well as provide emergency repairs as needed to ensure the long-term integrity of the lead repairs.

5. Healthy Homes Production (HHP) Grant: HRD was awarded \$2M with the period of performance beginning April 2022, going 42 months until October 2025. HHP funds plan to assist 125 units throughout the period of performance. HHP funds are expected to be used in conjunction with CDBG funds via the 0% Interest Home Repair Loan Program for lead hazards, in conjunction with LHR funds if Healthy Homes Supplemental are exhausted or for vulnerable residents working with the City's Community Health Corps (CHC).

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
- Completed 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 several different programs

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

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

- DHC has a comprehensive Capital Improvement Plan that addresses the needs of its properties based on the guidance received from Physical Needs Assessments, input from DHC staff and its residents. The Plan complies with HUD guidance and regulations. DHC continues to expend and administer 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 its operations and ability to serve the community in need of affordable housing
- DHC creates and follows 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 explores opportunities to collaborate with governmental agencies, non-profit community organizations, and developer partners to further the acquisition, development and preservation of affordable housing in the City of Detroit
- 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 has and will continue to form partnerships with developers to provide Project Based

Vouchers (PBV) rental assistance to further affordable housing in the city

- DHC will look to reposition its Public Housing properties to further affordable housing and increase our ability to serve current and future residents. These actions may include partnering with entities to develop or provide services at properties and seek tax-credits to aid in our redevelopment efforts
- DHC may 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 its residents
- DHC will seek out self-development as well as new development opportunities to assist with affordable housing initiatives
- DHC, with HUD national staff, has opened and will be expanding the Envision Center to promote family self-sufficiency.
- DHC through its HUD-awarded grants will expand workforce development and job training efforts

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 March 8, 2022 and made the Plan available for comment on March 11, 2022. DHC had encouraged the public to comment on the draft throughout the 45-day comment period. Pursuant to the authority provided under the Coronavirus Aid, Relief and Economic Security (CARES) Act (Public Law 116-136), HUD waived the regulatory requirement under the Public Housing Program for a Public Hearing for the Annual PHA Plan applicable to FY 2020. In lieu of that process, all Active DHC PHA families received notification of any significant changes applicable to the PHA Plan.

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 way financial assistance will be provided or other assistance

The Detroit Housing Commission is designated as a standard performer in both the Public Housing and Housing Choice Voucher Programs. DHC will continue to move toward the goal of achieving High-Performer status through concrete efforts in streamlining and improving its business systems and customer service delivery.

AP-65 Homeless & 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, CDBG-CV, ESG-CV 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 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 those experiencing chronic homelessness. In addition, all non-court-based prevention service referrals will flow through the CAM to allow for prevention services to fully be integrated into the homeless system.

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 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. As an unsheltered count was not conducted in 2021 due to the Coronavirus 19 pandemic, 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:

- Ensuring the safety of residents who are unsheltered during dangerous weather conditions through the funding of street outreach and seasonal warming centers.
- Coordinating access to permanent housing for those unsheltered as a high priority population.
- Connecting each unsheltered chronically homeless individual with a Housing Navigator to ensure individuals move as quickly as possible into permanent housing.

During the 2022-2023 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 their 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 or through the phone line during the COVID-19 pandemic. Once the assessment has been made, the household will be referred to a service provider to provide the assistance.

The City of Detroit increased coordination among outreach providers that are both federally and private funded. This level of collaboration begun in 2020 because of COVID-19 and has allowed outreach efforts to provide a more coordinated response that assist both the clients and the providers. In addition, 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 known locations where unsheltered persons reside. 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.

An essential role of CAM is the referral of households to emergency shelter, Rapid Re-Housing, and Permanent Supportive Housing. In 2021, most emergency shelter and permanent supportive housing (PSH) referrals were for single adults. While single adults made up 76% of referrals to shelter, they comprised 89% of referrals to PSH. This is largely because PSH is prioritized for chronically homeless households, and single adults are more likely to be chronically homeless than other population types. There was not a marked difference between the number of PSH referrals in 2020 compared to 2021.

In 2021 there were 805 households referred to Rapid Rehousing, which is a large increase of RRH referrals for that year in 2021, three times more RRH referrals in 2021 than in 2020. Also, there was a higher share

of RRH referrals that went to single adults than in previous years. ESG-CV funds played a role in this increase as additional providers and funding was allocated to this program type. 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 2022-2023 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.
- Continue operating a COVID-19 Isolation shelter (as long as funds allow) so that households experiencing homelessness who are COVID-19 likely or positive have a safe place to stay until they have recovered and are no longer contagious. This initiative is in partnership between the City of Detroit's Housing and Revitalization Department and a local non-profit service provider.
- 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 at least one Warming Centers operating during the winter of 2022-2023.
- 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 2021, a total of **2,066 households were diverted including:**
 - a. 51% of total Single Adults
 - b. 9% of Unaccompanied Youth
 - c. 32% of adult families presenting
 - d. 8% of Parenting Youth presenting
- The City will continue placing greater emphasis on housing outcomes for shelter providers through a performance based NOFA 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 2022-2023, the focus will be providing high quality transitional housing for individuals and families who

express a desire to live in these settings and keeping side doors closed to entry to ensure referrals come through the coordinated entry system. 2021 was the second full year that all HUD-funded TH providers took their referrals through CAM. The number of referrals (64 households) was similar to 2020 after decreasing from 2019. A higher share of referrals (52%) went to parenting youth than in previous years.

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. Veteran housing progress towards housing is tracked through an extensive by name list process. Through this process we have successfully reduced the number of Veterans experiencing homeless by 8% in 2021. We continue to monitor our progress through regular leadership team meetings and by name list meetings. As of April 2022, there were 152 Veterans experiencing homelessness in Detroit. In working on Veteran homelessness, we deploy the following tools to address Veteran needs:

- Supportive Services for Veteran Families (SSVF): SSVF provides 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 helps 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. Due to COVID-19, Veterans that were considered high risk for the virus were placed in hotels using SSVF funding. This initiative helped keep Veterans out of congregate settings during the global pandemic.
- HUD-VASH: HUD-VASH is a permanent supportive housing program funded by both HUD and the Veterans Administration (VA). Veterans receive a voucher for housing that is partnered with case management to ensure a successful transition from homelessness to housed.
- 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. There are 194 GPDTH beds in the City of Detroit.

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

- A portion of the emergency shelter 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 Detroit Housing Commission or the Michigan State Housing Development Authority

Unaccompanied Youth - In the 2018-2019 year, the Youth Taskforce was established by City Council President Mary Sheffield. 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 at least two emergency shelters that are specifically for youth.
- There will be one transitional housing programs specifically targeted to youth that can also 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).
- There will be two organizations that provide Rapid Re-Housing specifically to youth.

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 2022-2023 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.

Landlord engagement- In 2021 the City of Detroit started exploring a system level landlord engagement and coordination project. While still in its infancy, the ultimate goal is to create a standard landlord engagement and housing program that can significantly increase our landlord pool. The participating landlords would already be vetted, willing to work with providers for rental payments, and update vacancies in an outward facing database that both providers and people experiencing homelessness can access to find available units.

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. The homeless system is increasing the level of collaboration through a formal partnership with Detroit at Work that includes a referral process connecting households experiencing homelessness with Detroit at Work at the time of entry into emergency shelter. This immediate referral allows families to quickly connect with employment services as it is often a critical component to ending a household’s homelessness.

Discussion

For 2022-2023 year, CDBG funds totaling approximately \$2.5M 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 Search and Placement & Housing Relocation Stabilization Services)
- Homeless Prevention Services (Housing Navigation /Relocation Services & Foreclosure Prevention)
- Warming Centers
- Coordinated Entry

CDBG homeless funds are also used to meet the 2022-2023 ESG match. ESG regulations require a 100 percent match for every dollar received from HUD. During 2022-2023, CDBG funds will match approximately 85 percent of the 2022 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 using HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	0
Tenant-based rental assistance	225
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	0
Total	225

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 makes efforts to remove policy and market barriers to the development and preservation of affordable housing and to implement policies and programs to proactively encourage affordable housing. As identified in the development of the Multi-Family Affordable Housing Strategy in 2018, the key barriers to affordable housing in Detroit include tax policies, access to capital for affordable housing, 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

To ameliorate barriers to affordable housing, the City of Detroit is taking the following actions:

Tax Abatement Streamlining—Due to high tax rates within the City of Detroit, tax abatements including the Payment in Lieu of Taxes (PILOT) are necessary tools to make affordable and mixed income housing feasible. The process for securing tax abatements has been difficult for developers to navigate, so the City of Detroit is developing a tax abatement portal to bring efficiency and transparency to the process. The City is currently engaged in both procurement and hiring to develop the tax abatement portal.

Access to Capital—The City has collaborated with philanthropic investors and the Local Initiative Support Corporation to develop a private affordable housing loan and equity investment tool to compliment and augment public investment in affordable housing. This tool was launched in fall the 2020 and has grown to \$65 million in fund capacity.

Technical Assistance for Preservation—The City entered a contract with a team of vendors that constitute a Preservation Partnership Team. This team’s scope includes the identification of priority affordable housing preservation targets and the provision of technical assistance to affordable housing owners to assist in the navigation of public funding, private preservation tools, and incentives.

Inclusionary Housing Ordinance—The City continues to administer an inclusionary housing ordinance that requires affordable housing agreements to be executed in conjunction with certain public land sales, tax abatements, or public financing. The ordinance also creates the Affordable Housing Development and Preservation Fund to transfer 20% of public commercial land sale proceeds to

affordable housing activities.

Access to Land in Prime Locations for Affordable Housing—The City utilizes several mechanisms to prioritize affordable housing in prime locations. The City is working with philanthropic and nonprofit partners to make significant public and private investments into comprehensive neighborhood and commercial corridor plans, an initiative called the Strategic Neighborhood Fund. As part of the site selection for catalytic development projects, the City is identifying sites that are conducive to affordable housing and prioritizing development proposals that include affordable units. The City also releases RFPs for publicly owned land and has prioritized parcels that would be competitive in the State of Michigan’s Low Income Housing Tax Credit application process.

Discussion:

The City of Detroit consistently engages with affordable housing developers to identify needs and opportunities to improve the process of bringing affordable housing to market. The City of Detroit Housing and Revitalization Department has a Public Private Partnerships division that assists developers navigate city processes from site selection through construction completion including the navigation of permitting, public financing, incentives, site plan review.

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 now the Coronavirus pandemic 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 addressing obstacles to meet underserved needs by leveraging our funding with other government funding streams and private resources. The City of Detroit will continue to 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.

Home-ARP: New this upcoming year will be the introduction of HOME-ARP funding. The American Rescue Plan (ARP) will provide approximately \$26.5 million through the HOME Investment Partnerships Program to the City of Detroit. The funding will be used to make targeted, strategic investments in housing and other assistance for people experiencing homelessness. The City is currently developing an allocation plan that is required by HUD in order to receive funding. The allocation plan consists of stakeholder and community consultations, a homelessness system needs assessment and gaps analysis, and a proposed plan of how the funding will be used. Once the City's plan is approved by HUD, this funding will be used for the development of permanent supportive housing, creation of a non-congregate shelter, supportive services, and non-profit assistance to carry out HOME-ARP activities.

ARPA Prevention and Diversion: The Department of Treasury awarded the City of Detroit funding through the American Rescue Plan Act (ARPA). A portion of this funding, three million dollars, will be used to assist efforts in preventing and/or diverting episodes of housing insecurity (homelessness). ARPA funding will support two core initiatives providing key stop-gap measures to reduce the number of Detroit households entering emergency shelter: diversion and homeless prevention for doubled up households. Both programs will serve single adults and families who reside in the City of Detroit with an annual income at or below 60% AMI. The first initiative, Prevention, targets households staying with friends or family, often referred to as "doubled up", who need to leave their housing because it is either overcrowded or unstable. Prevention activities include limited case management which focuses on

identifying a new housing unit while connecting clients to mainstream resources and client level financial assistance for security deposits and rental assistance. This funding will be used coordination with the ESG Prevention funding that can serve households doubled up or facing eviction. The second initiative, Diversion, targets households that are in immediate need of emergency shelter and contacts the front door of the homeless system, referred to as the Coordinated Assessment Model (CAM). Diversion activities include engagement and financial assistance. Engagement focuses on planning and problem solving to assist clients with either staying in their current unit or moving in with other family or friends (assistance could be monetary or in the form of mediation). The Diversion program may also assist clients with finding a new unit and first month's rent/security deposit.

Due to COVID-19, **Emergency Rental Assistance Program (ERAP)** was made available through the State of Michigan. A portion of this funding flowed through the City of Detroit. It is available to landlords and their renters who have been financially impacted by the pandemic. This grant provides another level of assistance for households that do not qualify for ESG prevention funds. In situations where renters are losing their home due to nonpayment 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 passed these homes to a nonprofit partner (United Community Housing Coalition) at no additional cost, and UCHC worked 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 the 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. In addition to the assistance to homeowners, ESG and ESGCV funds are used to prevent households from losing their residences.

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 diverse 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 plans the following actions to foster and maintain affordable housing and advance the City's goal of developing 2,000 units and preserving 10,000 units of affordable housing by the end of 2023: (1) Deploy federal and local affordable housing subsidies through a bi-annual Notice of Funding Availability process. The Housing & Revitalization Dept. continues to make funds available for the development and preservation of affordable housing, utilizing

HOME, CDBG, and locally derived sources; (2) Continue to partner with a local CDFI to deploy a private housing leverage fund. In partnership with Local Initiative Support Corporation, the City launched the Detroit Housing for the Future Fund, a \$65 million private affordable housing fund that offers low-interest debt, preferred equity, and predevelopment grants to increase affordable housing production and preservation; and (3) Advance the Preservation Partnership. The City is partnering with Enterprise Community Partners to identify affordable housing preservation opportunities and provide technical and financial resources to advance and complete preservation projects.

Actions planned to reduce lead-based paint hazards

The 2019 American Community Survey (ACS), reports that approximately 89% of Detroit's occupied housing units were built before 1978, with 29% built before 1940. Given the age of the City of Detroit's housing stock, there is significant concern of lead-based paint hazards in residential units. The City of Detroit, through its Housing & Revitalization Department (HRD), is committed to seeking funding for reducing lead hazards and providing prevention information and educational awareness on 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 make homes lead safe. These funds are used in conjunction with our CDBG home repair dollars to identify and remediate lead-based paint hazards in privately owned rental or owner-occupied housing. In addition, these OLHCHH grants will also identify and address, where feasible, other health and safety issues by performing a Healthy Homes Assessment.

In 2019, HRD was awarded its 5th Lead Hazard Reduction (LHR) Grant from OLHCHH with a period of performance of April 1, 2019, through September 30, 2022 (extended through September 30, 2023). The target accomplishment is to reduce lead hazards in approximately 200 housing units in which children under the age of 6 resides or regularly visits, or where a pregnant woman resides. In 2018, HRD was also awarded \$1.2M/annually for up to 5 years from the Michigan Department of Health and Human Services (MDHHS) to complete lead-based paint hazard remediation on an additional 25 units annually. In October 2019, HRD was awarded \$9.7M from HUD's OLHCHH for a High Impact Neighborhood (HIN) to target lead hazard control activities in southwest Detroit. This program is expected to serve up to 455 units over 5 years (January 1, 2020, through December 31, 2024, extend to May 2025). In 2022, HRD was award a \$2M Healthy Homes Production (HHP) grant through OLHCHH to address priority healthy homes hazards with includes lead-based paint hazards. These funds are expected to assist 125 units over 3.5 years.

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. For households experiencing homelessness, 1,332 referrals were made in 2021 to either Rapid Re-Housing (805) or Permanent Supportive Housing (527) according to the Southwest Solutions Coordinated Entry 2021 Data Report. These programs provide subsidized rental assistance along with case management to assist households with increasing their self-sufficiency and increasing their income.

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, teacher vacancies in the district have reduced by more than half, and salaries have increased by more than \$5,000 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 2022-2023, CDBG Neighborhood Opportunity Fund will support approximately \$1.3 million in funding educational programs.

Transportation:

Transportation is the key to all Detroiters being able to access employment opportunities. Over the last four years, DDOT have invested in new buses and routes, and improved operations. Transportation priorities include: Increasing economic opportunity and reducing poverty by delivering a high-quality transit service and providing more ways for people to access every neighborhood in Detroit; Improving public safety by reducing traffic injuries and fatalities and making everyone feel safe walking, biking, and taking transit to their destination; Introducing the new DDOT Bus Tracker where individuals can track their bus via text message or by going to myddotbus.com on an internet browser; Strengthening city functionality by bringing our infrastructure and operations into a state of good repair and having the right systems in place to deliver on our promises. The DDOT will make reasonable accommodations for individuals with disabilities to fully use the transit services.

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 includes: 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; Grow Detroit Young Talent (GDYT) is a citywide summer jobs program that trains and employs young adults between the ages of 14 and 24 with both soft and hard skills and then matches them with over 200 employers to provide on-the job training between July and September.

Actions planned to develop institutional structure

The City of Detroit has developed its institutional structure by establishing partnerships with City departments and agencies, public housing, private institutions, non-profit organizations and continuum of care providers. When implementing the plan and to carry-help 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. Our entity partners, entity type and roles are described: City Departments and Agencies: 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; Detroit Building Authority is responsible for demolition of residential and commercial building and elimination of blight within the 7 districts in Detroit; Detroit Land Bank Authority is responsible for demolition of residential and commercial building and elimination of blight within the 7 districts in Detroit; Department of Neighborhoods is responsible for helping residents form block clubs and community associations; drive community engagement on neighborhood planning projects and other initiatives; resolve citizens' complaints; and educate residents on a broad range of City programs and policies; Detroit Health Department is responsible for providing programs/services, through The Housing Opportunities for Persons with AIDS (HOPWA) grant programs; and Tenant Based Rental Assistance (TBRA) and Housing Supportive Services; Building Safety Engineering and Environmental Department (BSEED) is responsible for lead hazard inspection for a rental property; rental housing compliance; Detroit Department of Transportation (DDOT) is responsible for public transportation operator of city bus service in Detroit; and Wayne Metropolitan Community Action Agency (WMCAA) is responsible for homeless programs and services: 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. Public Housing Authority (PHA): Detroit Housing Commission (DHC) is responsible for public housing. The DHC manages the following program: Section 8 Low-income public housing. Redevelopment Authority: Detroit Economic Growth Corp is responsible for economic

development. Private Industry: Local Initiatives Support Corporation (LICS) is responsible for the Zero Percent Home Repair Loan (homeowners program). In addition, to investing in affordable housing, growing businesses, safer streets, high-quality education and programs that connect people with financial opportunity. Continuum of Care: Homeless Action Network of Detroit (HAND) is responsible for homelessness, non-homeless special needs, public housing, rental and public services. Non-profit organizations: Fair Housing Center of Metropolitan Detroit is responsible for housing discrimination public services; Detroit Area of Aging Agency (DAAA) is responsible for senior public services and homelessness; Detroit Housing Coalition is responsible for foreclosure prevention public services and homelessness.

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

The Detroit Housing Commission will continue in its efforts to create more affordable housing opportunities in the City of Detroit, pursuant to the Mayor's Strategic Plan, published in 2018. Further, DHC is working to streamline and improve its business systems to increase efficiency in its delivery of services to Detroiters who use the services it provides.

The city also supports DHC's efforts to create a more robust array of supportive and social services to its residents in both the public housing and Housing Choice Voucher programs. Beginning several years ago with the opening of the EnVision Center, established to leverage public and private resources for the benefit of individuals and families, residing in federally assisted housing, interested in achieving economic independence through better educational opportunities and employment training.

Toward this end, DHC continues to receive HUD grants for Resident Opportunities Self-Sufficiency (ROSS), Family Self-Sufficiency (FSS) our most recently was awarded Jobs Plus. DHC waits to see if it will receive a YouthBuild grant from HUD. DHC has brought together a number of public and private services stakeholders, creating a menu of programs and a referral network serving public housing and voucher holders beginning at the age of 18.

For youth, whose families participate in our rental assistance programs, DHC continues to work with the city on bringing broadband access to the city's most economically challenged citizens. Specifically, DHC is partnered with private organizations who have donated and continue to donate laptops for school-age young people, and to provide furniture to families leasing units and clothing for those getting ready to enter/re-enter the world of work.

The City of Detroit will also continue to support the DHC in its forward progress of their EnVision Center. HUD Secretary has promoted 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:

Pursuant to its authority under the Fair Housing Act, HUD has long directed program participants to undertake an assessment of fair housing issues. 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.

The 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. Funding non-profit groups such as United Community Housing Coalition and Legal Aid & Defender will assist in resolving fair housing barriers for individuals who are disabled including our seniors and veterans. We also funded Fair Housing Center of Metropolitan Detroit to continue their efforts on pushing fair housing awareness for city residents.

The City of Detroit will continue to combat issues with impediments to Fair Housing from the assessment by efforts from the Civil Rights, Inclusion and Opportunity Department's (CRIO) complaint procedures. CRIO will assist in meeting the City of Detroit statutory obligation to affirmatively further the purposes and policies of the Fair Housing Act. In addition, the CDBG will continue to fund several other non-profit groups for the purposes of furthering fair housing.

Program Specific Requirements

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

Introduction:

HRD will continue to 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 opportunities, 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) 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.	\$12,985.72
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
---	---

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.

0.86%

**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 of Detroit will not use any new proceeds from the HOME Investment Partnership Program for homebuyer assistance, new construction of owner-occupied single-family homes, or rehab of owner-occupied single-family homes. The City of Detroit will use proceeds from the Community Development Block Grant for homebuyer assistance. Proceeds from the HOME Investment Partnership Program will continue to be used for the construction and rehab of rental housing in the City of Detroit and will continue to follow the requirements as stated in 24 CFR 92.

At the request of current developers/property owners and the existing low-income rental households, the City of Detroit may convert some of the existing HOME-assisted single-family rental units into homeownership units. This will give the current low-income household, who initially occupied the home as a rental unit, the opportunity to be a homeowner. This will apply to HOME-assisted single-family units originally assisted with proceeds from the HOME Investment Partnership Program for the construction or rehab of single-family rental units. Several of these single-family rental units have past their Low-Income Housing Tax Credit (LIHTC) 15-year compliance period and are eligible (through the LIHTC program) to be converted from a rental unit to a homeownership unit.

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:

For the existing HOME-assisted single-family units that are being transferred from rental to ownership, the new household must qualify as a low-income family and must be the principal residence of the family throughout the period of affordability, as stated in 24 CFR 92.254(3), or be transferred to a household that is qualified as low-income (per 24 CFR 92) during the period of affordability. The home will continue to be encumbered by an affordable housing restriction throughout the period of affordability. This affordable housing restriction will be signed by the homebuyer and recorded with the Wayne County Register of Deeds.

- 4. For existing HOME Assisted units that are out of compliance with the HOME Investment Partnership Program,** The City of Detroit will use the Resale Requirements as defined in 24 CFR 92.254 (5) (i). This specifically applies to HOME Assisted units that were initially funded to be used as rental units, but will be converted to home ownership units, as defined in 24 CFR 92.255.

During the HOME Loan Compliance Period, if the title of the property is transferred voluntarily or involuntarily to a homebuyer that does not meet the requirement of Low-income Families, the City of Detroit will capture the net proceeds of the sale.

- 5. 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.
2. The owner can 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.
4. The property must be in the City of Detroit.

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 was updated due to system changes. These updates were completed and published in 2018 and will continue to be updated by the CoC Performance Evaluation Committee

and approved by the CoC board. (See attached policies and procedure manual for ESG)

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 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. Due to COVID-19 CAM temporarily moved to a call center model but will switch back to in-person access points once the public health threat has ceased.

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 part of 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. Started in 2019-2020, the City of Detroit combined the RFP and contracting process for ESG and CDBG which streamlined the process 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 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. In addition, starting in 2021 City of Detroit’s Homelessness Solutions NOFA application review committee included a person with lived experience. As part of the review committee, they scored applications that is directly linked to funding decisions.

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, which further detail performance expectations to increase accountability. During the 2021-22 fiscal year, RFP’s for the Homelessness Solutions programs, the City defined performance measures, established baselines, and benchmarks for organizations to meet during the coming year. This work has continued in future funding applications.

Discussion:

Housing Opportunities for Persons with Aids (HOPWA)

1. Identify the method of selecting project sponsors and describe the one-year goals for HOPWA funded projects:

2. Selection of Project Sponsors

The City of Detroit Health Department is the grantee for the HOPWA Program providing all Human Resource and fiduciary responsibility. 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 and contractors for the HOPWA program are as follows:

“Request for Proposal” (RFP) application is issued for potential program sponsors and contractors 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 s

oring for the proposals are based on an independent review panel made up of representatives of the community.

Project sponsors and contractors are reviewed and evaluated and will be given extension contracts if they have successfully performed during the program year.

3. 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 225 eligible individuals and their beneficiaries with Housing assistance which include, subsidized rental payments and Case Management services and linkages to supportive services.

2. Supportive Services

Supportive Services, characterized as a key ingredient in helping person with HIV/AIDS achieve housing stability, are an interconnected component of the HOPWA program. HOPWA rental assistance are not intended to provide "stand alone" rental subsidies but come with the requirements that an appropriate level of supportive services designed to meet the programs objectives of maintaining housing stability, avoiding homelessness, and assuring access to care and support are included.

Clients enrolled in HOPWA have individualized Case Plans that include an assessment of their housing needs as well as the supportive services needed for them to become and remain stable in housing. This plan is updated regularly during quarterly visits with the client assigned Housing Coordinator.

3. Short-Term Rent, Mortgage and Utility (STRMU)

Detroit HOPWA Received COVID funds to assist the community with financial support to mitigate circumstances brought on specifically by COVID-19. Part of the funds were designated for COVID-19 STRMU.

COVID-19 STRMU is for persons who either lost employment or had inconsistent income due to the pandemic and could not continue to meet rent mortgage or utility payments.

As STRMU is a “need-based” program, applicants must submit evidence that they do not have the resources to meet rent, mortgage or utility payments and, in the absence of this assistance, would be at risk of homelessness.

The amount of assistance is determined by client’s household income and monthly household expenses and HUD’s recommended 30% of income toward living costs.

Although assistance is temporary, clients can receive up to 24 months of assistance with monthly payment caps of \$1500 toward rental/mortgage payments per month and \$150 toward utility payments per month.

Clients will also need to complete a Housing Plan and Budget with review every 6 months to continue assistance.

APPENDICES:

FY 2022-23 ACTION PLAN BUDGET

2021-22 HUD Annual Action Plan Budgeted 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	05H	Public Service - Summer Jobs Program including GYDT and Training (NRSA 1-5)	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	7/1/2022	6/30/2023	Creating Economic Opportunities	Availability/Accessibility	Improve economic opportunities for LMI persons	People	500	Public Service	Public Services	N/A	1 thru 5	N/A	N/A
CDBG	PS	LMC	05C	Accounting Aid Society	90,416.50	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	7/1/2022	6/30/2023	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	ALL	ALL	ALL
CDBG	PS	LMC	05A	Bridging Communities, Inc	73,905.00	Requesting funds for senior activities; non-medical transportation to doctor's visits, nutritional support. Volunteer training to provide smallhome repairs and home chore services	6900 McGraw, Detroit, MI 48210	7/1/2022	6/30/2023	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	ALL	ALL	5
CDBG	PS	LMC	05M	Cass Community Social Services	63,905.00	To provide sustainability institute to train unemployed and underemployed adults to succeed in living wage jobs in the 21st Century Green Economy in metropolitan Detroit. The program will serve 12-13 persons monthly/25 unduplicated persons annually.	11745 Rosa Parks Detroit, MI 48206	7/1/2022	6/30/2023	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	ALL	ALL	
CDBG	PS	LMC	05H	Center for Employment Opportunities	78,905.00	CEO program aim to reduce recidivism and improve employment outcomes for people returning home from incarceration	7310 Woodward Ave. Detroit, MI 48202	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	100	Public service activities other than low/moderate-income housing benefit	Public Services	X	ALL	ALL	ALL
CDBG	PS	LMC	05D	Clark Park Coalition	73,905.00	Provide year-round sports, arts and arrange of Youth summer recreation programs , a winter hockey program, and youth employment opportunities.	1130 Clark Street Detroit MI 48208	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	133	Public service activities other than low/moderate-income housing benefit	Public Services	N/A	2, 3	2	4, 5, 6
CDBG	PS	LMC	05D	Cody Rouge Community Action Alliance	73,905.00	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	7/1/2022	6/30/2023	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	N/A	N/A	N/A	7
CDBG	PS	LMC	05D	Coleman A. Young Foundation	63,633.00	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.	8425 W. McNichols Rd. Detroit, MI 48221	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	226	Public service activities other than low/moderate-income housing benefit	Public Services	N/A	N/A	N/A	5
CDBG	PS	LMC	05D	Detroit Area Pre-College Engineering Program (DAPCEP)	68,905.00	Program provides nationally recognized enrichment programs in science technology, engineering, and mathematics.	42 W. Warren Detroit, MI 48202	7/1/2022	6/30/2023	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	X	ALL	ALL	ALL
CDBG	PS	LMC	05A	Delray United Action Council	68,905.00	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	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	125	Public service activities other than low/moderate-income housing benefit	Public Services	X	ALL	ALL	ALL
CDBG	PS	LMC	05A	Disability Network	68,905.00	Living Well with a disability is a ten-week program that teaches independent living skills such as goal setting, problem solving, and communication skills.	5555 Conner Ave Suite 2224 Detroit, MI 48213	7/1/2022	6/30/2023	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	ALL	ALL	ALL
CDBG	PS	LMC	05Z	Dominican Literacy Center	78,905.00	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	7/1/2022	6/30/2023	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	N/A	2	N/A	4

2021-22 HUD Annual Action Plan Budgeted 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	05H	Family Assistance for Renaissance Men	63,905.00	Provide residents with on-going fair housing education services to eliminate impediments to fair housing choice and provide equality of housing opportunities for all protected classes and ethnic groups.	18701 Grand River #173, Detroit, MI 48223	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	80	Public service activities other than low/moderate-income housing benefit	Public Services	N/A	ALL	N/A	4
CDBG	PS	LMC	05H	The Greening of Detroit	68,905.00	Greening job training program works to provide new opportunities for low-income Detroiters to receive training that allows them to enter the green jobs marketplace.	13000 W. Mcnichols Rd, Ddetroit MI 48235	7/1/2022	6/30/2023	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	X	N/A	N/A	1
CDBG	PS	LMC	05H	International Institute of Metropolitan Detroit	78,905.00	Adult Education/Workforce Development program, the Economic Advancement, Literacy and Training Program. The program will prepare low-income Detroiters with the basic literacy, workforce preparation and training serving 360 individuals annually.	111 East Kirby Detroit, MI 48202	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	360	Public service activities other than low/moderate-income housing benefit	Public Services	N/A	2,3,5	2	4,5,6,7
CDBG	PS	LMC	05I	Jefferson East Business Association	73,905.00	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	7/1/2022	6/30/2023	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	N/A	1	N/A	3, 4, 6
CDBG	PS	LMC	05A	L&L Adult Day Care	78,905.00	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	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	456	Public service activities other than low/moderate-income housing benefit	Public Services	X	ALL	ALL	ALL
CDBG	PS	LMC	05E	Latin Americans for Social and Economic Development (LASED)	73,905.00	Transportation, food assistance, and help in obtaining access to other vital services and wellness.	4138 W. Vernor Hwy. Detroit MI 48209	7/1/2022	6/30/2023	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	N/A	1	N/A	5
CDBG	PS	LMC	05A	Luella Hanan Memorial	78,905.00	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	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	1156	Public service activities other than low/moderate-income housing benefit	Public Services	X	ALL	ALL	ALL
CDBG	PS	LMC	05A	Matrix Human Services	78,905.00	Providing services for casemangement for seniors, food assistance, transportation to doctor's appointments, socialization activities: attending wellness centers, shopping etc.	13560 E. Mcnichols Detroit MI 48205	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	550	Public service activities other than low/moderate-income housing benefit	Public Services	X	ALL	ALL	ALL
CDBG	PS	LMC	05D	Mercy Education Project	78,905.00	Mercy Education Project provides educational opportunities, life skills development, and cultural enrichment to help at-risk girls and women in southwest Detroit improve their quality of lives.	1450 Howard Street Detroit MI 48216	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	20	Public service activities other than low/moderate-income housing benefit	Public Services	N/A	N/A	N/A	5
CDBG	PS	LMC	05M	My Community Dental Center (MCDC)	78,905.00	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	7/1/2022	6/30/2023	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	N/A	N/A	N/A	5
CDBG	PS	LMC	05M	Project Healthy Community	73,905.00	Family Wellness Program is to improve the health of Detroit residents through improved health literacy, health behaviors, nutrition, and exercise. The program seeks to strengthen the relationship between participants and their primary care providers.	18100 Meyer Dr. Detroit, MI 48235	7/1/2022	6/30/2023	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	N/A	N/A	2
CDBG	PS	LMC	05Z	SER Metro Detroit	73,905.00	Apprenticeship Readiness Training Program which program expanded contextualized programming to low-incom and unemployment residents. The program enrolls residents over 18yrs old w/a HS diploma/GED with goals of increasing their math and reading skills to prepare for Workkeys test and apprenticeship training exam.	9301 Michigan Ave Detroit, MI 48210	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	Improve the services for low/mod income persons	People	80	Public service activities other than low/moderate-income housing benefit	Public Services	N/A	N/A	N/A	1
CDBG	PS	LMC	05H	Siena Literacy Center	68,905.00	Basic adult literacy services and support to adults so they can successfully pursue personal goals, which include entering advanced/secondary education or workforce training, developing consumer skills to navigate life and society.	16888 Trinity Detroit MI 48219	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	Improve the services for low/mod income persons	People	175	Public service activities other than low/moderate-income housing benefit	Public Services	N/A	N/A	N/A	1
CDBG	PS	LMC	05Z	Southwest Detroit Business Association (SDBA)	63,905.00	El Arte en la Clase after school program is to provide exposure and access to low-income students who might not otherwise have the opportunity to hear / play / learn music and performing arts.	7752 West Vernor Hwy. Suite 101 Detroit MI 48209	7/1/2022	6/30/2023	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	N/A	N/A	6

2021-22 HUD Annual Action Plan Budgeted 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	05Z	Southwest Economic Solution Corporation	78,905.00	MathUp is an accelerated GED program for adult learners that addresses the significant challenges of passing the math portion of the GED exam.	2835 Bagely, Suite 800 Detroit, MI 48216	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	Improve the services for low/mod income persons	People	60	Public service activities other than low/moderate-income housing benefit	Public Services	X	N/A	N/A	6
CDBG	PS	LMC	05D	Sowing Empowerment & Economic Dev (SEED)	63,905.00	Provides summer and after-school literacy program using the CDF Freedom Schools curriculum. The curriculum supports children and families through high quality literacy and character building enrichment; parent and family involvement and social action.	13560 E. McNichols Detroit MI 48205	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	Improve the services for low/mod income persons	People	100	Public service activities other than low/moderate-income housing benefit	Public Services	X	N/A	N/A	6
CDBG	PS	LMC	05A	St. Patrick Senior Center	90,417.00	Provides nonemergency medical and basic needs transportation, operates a senior on-site medical clinic, enhanced senior fitness and an on-site full meal. Heal care benefit navigators, and classes in disease prevention and healthy living	58 Parsons Street Detroit MI 48201	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	Improve the services for low/mod income persons	People	3129	Public service activities other than low/moderate-income housing benefit	Public Services	X	N/A	N/A	6
CDBG	PS	LMC	05Z	St. Vincent & Sarah Fisher Center	78,905.00	Provides preparation for successful completion of the GED exam and assist residents to become economically self-sufficient adults 18 years and older.	16800 Trinity, Detroit, MI 48219	7/1/2022	6/30/2023	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	X	N/A	N/A	6
CDBG	PS	LMC	05D	Teen Hype Youth Development	78,905.00	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.	1938 Franklin Detroit, MI 48207	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	Improve the services for low/mod income persons	People	2200	Public service activities other than low/moderate-income housing benefit	Public Services	X	N/A	N/A	3
CDBG	PS	LMC	05D	The Youth Connection	78,905.00	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	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	Improve the services for low/mod income persons	People	35	Public service activities other than low/moderate-income housing benefit	Public Services	X	N/A	N/A	3
CDBG	PS	LMA	05D	Urban Neighborhood Initiative	63,905.00	To support out-of-school education for youth ages 5-14/after school and summer enrichment programs/ sports/ STEM, art, computer.	8300 Longworth Detroit MI 48209	7/1/2022	6/30/2023	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	N/A	3	N/A	6
CDBG	PS	LMC	05D	Wellspring	78,905.00	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	7/1/2022	6/30/2023	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	N/A	5	N/A	1
CDBG	PS	LMC	05M	World Medical Relief	73,905.00	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	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	Improve the services for low/mod income persons	People	1650	Public service activities other than low/moderate-income housing benefit	Public Services	X	ALL	ALL	N/A
CDBG	PS	LMC	05D	YMCA	63,905.00	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	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	Improve the services for low/mod income persons	People	420	Public service activities other than low/moderate-income housing benefit	Public Services	N/A	N/A	N/A	5
					2,589,426.50	Subtotal Public Service (Excluding NRSA PS)														
CDBG	PSHL	LMC	03T	Alternatives For Girls (ES)	78,645.31	(ES) Provides shelter for young women.	903 West Grand Blvd. Detroit MI 48208	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	100	Homeless person overnight shelter	Emergency shelter and transitional housing	X	N/A	N/A	N/A
CDBG	PSHL	LMH	05S	Alternatives For Girls (RR)	47,015.60	Rehouse women and women with children that are literally homeless.	904 West Grand Blvd. Detroit MI 48208	7/1/2022	6/30/2023	Decent Housing	Affordability	End Chronic Homelessness	People	50	Homeless person overnight shelter	Emergency shelter and transitional housing	X	N/A	N/A	N/A

2021-22 HUD Annual Action Plan Budgeted 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	03T	Cass Community Social Services Family Shelter (ES)	44,798.56	Provide rotating shelter for adults and family shelter.	11850 Woodrow Wilson, Detroit MI 48206	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	140	Homeless person overnight shelter	Emergency shelter and transitional housing	X	N/A	N/A	N/A
CDBG	PSHL	LMC	03C	Cass Community Social Services (SO)	166,829.55	Outreach program outside business hours focused on unsheltered persons.	11745 Rosa Parks Blvd. Detroit MI 48206	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	100	Homeless person overnight shelter	Outreach	X	N/A	N/A	N/A
CDBG	PSHL	LMC	03C	Cass Community Social Services (Wm Ctr)	78,424.12	Warming center for families.	1534 Webb, Detroit MI 48206	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	100	Homeless person overnight shelter	Outreach	X	N/A	N/A	N/A
CDBG	PSHL	LMC	03C	Central United Methodist/NOAH (SO)	215,000.00	Outreach program outside business hours focused on unsheltered persons.	23 East Adams Detroit MI 48226	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	1500	Homeless person overnight shelter	Outreach	X	N/A	N/A	N/A
CDBG	PSHL	LMC	03T	Coalition on Temporary Shelter (COTS) (ES)	110,948.56	Provides shelter for families (male, female and children).	26 Peterboro Detroit MI 48201	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	100	Homeless person overnight shelter	Emergency shelter and transitional housing	X	N/A	N/A	N/A
CDBG	PSHL	LMH	05S	Community Home Support (RR)	31,515.60	Quickly rehouse families and individuals that are literally homeless.	220 Bagley Street, #600 Detroit, MI 48226	7/1/2022	6/30/2023	Decent Housing	Affordability	End Chronic Homelessness	People	50	Tenant-based rental assistance/Rapid rehousing	Rapid Re-housing	N/A	3	N/A	5
CDBG	PSHL	LMH	05S	Community Home Support (Shelter Replacement) (RR)	95,228.63	Quickly rehouse families and individuals that are literally homeless.	220 Bagley Street, #600 Detroit, MI 48226	7/1/2022	6/30/2023	Decent Housing	Affordability	End Chronic Homelessness	People	50	Tenant-based rental assistance/Rapid rehousing	Rapid Re-housing	N/A	3	N/A	5
CDBG	PSHL	LMC	03C	Community Home Support (SO)	166,829.05	Navigation to assist persons experiencing unsheltered homelessness to obtain housing. Prioritizes service to those experiencing chronic homelessness	2111 Woodward, Suite 608 Detroit MI 48201	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	100	Homeless person overnight shelter	Outreach	X	N/A	N/A	N/A
CDBG	PSHL	LMC	03T	Covenant House (ES)	72,518.56	Provides shelter for teens 18-24 years of age.	2959 MLK Blvd. Detroit MI 48208	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	50	Homeless person overnight shelter	Emergency shelter and transitional housing	X	N/A	N/A	N/A
CDBG	PSHL	LMC	03C	Detroit Health Dept Street Outreach (Code Blue) (Detroit Safe Team) (SO)	246,076.39	The Detroit Health Department Outreach Team will assess the housing and human services needs of the families living in occupied foreclosures across the city, as well as assisting precariously housed individuals and families. The Outreach Team will address immediate needs while helping to secure some form of stable and permanent housing in the case of emergency relocation.	2 Woodward CAYMC, Detroit, MI 48226	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	230	Homeless person overnight shelter	Outreach	N/A	1 thru 5	N/A	N/A
CDBG	PSHL	LMC	03T	Freedom House (ES)	72,238.91	Provides services to political refugees.	Suppressed	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	106	Homeless person overnight shelter	Emergency shelter and transitional housing	X	N/A	N/A	N/A
CDBG	PSHL	LMC	05Q	Legal Aid & Defender (HP)	145,387.00	Legal services and financial assistance for those at-risk of homelessness.	613 Abbott Detroit MI 48226	7/1/2022	6/30/2023	Decent Housing	Affordability	End Chronic Homelessness	People	150	Homelessness prevention	Prevention	X	N/A	N/A	N/A
CDBG	PSHL	LMC	05Q	Matrix Human Services (HP)	60,997.94	Prevention services for those at-risk of homelessness	1400 Woodbridge Street Detroit, MI 48207	7/1/2022	6/30/2023	Decent Housing	Affordability	End Chronic Homelessness	People	150	Homelessness prevention	Prevention	X	N/A	N/A	N/A
CDBG	PSHL	LMC	03T	Methodist Children's Home Society of Michigan (ES)	56,030.00	Shelter provider for pregnant or parenting Detroit youth and their children.	1600 Blaine Detroit MI 48206	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	75	Homeless person overnight shelter	Emergency shelter and transitional housing	X	N/A	N/A	N/A
CDBG	PSHL	LMC	03T	Michigan Verteran's Foundation (ES)	32,198.56	Provides shelter for homeless male veterans.	4626 Grand River Ave, Detroit, MI 48208	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	75	Homeless person overnight shelter	Emergency shelter and transitional housing	X	N/A	N/A	N/A
CDBG	PSHL	LMC	03T	Neighborhood Service Organization (ES)	240,000.00	Shelter provider for single adults	1533 Cadillac Blvd Detroit, MI 48214	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	100	Homeless person overnight shelter	Emergency shelter and transitional housing	X	N/A	N/A	N/A

2021-22 HUD Annual Action Plan Budgeted 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	03C	Neighborhood Service Organization (SO)	175,000.00	Navigation to assist persons experiencing chronic homelessness to obtain housing	882 Oakman Blvd Detroit, MI 48238	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	100	Homeless person overnight shelter	Outreach	X	N/A	N/A	N/A
CDBG	PSHL	LMH	05S	Ruth Ellis (RR)	47,015.60	Quickly rehouse families and individuals that are literally homeless.	77 Victor Street Detroit MI 48203	7/1/2022	6/30/2023	Decent Housing	Affordability	End Chronic Homelessness	People	50	Tenant-based rental assistance/Rapid rehousing	Rapid Re-housing	X	N/A	N/A	N/A
CDBG	PSHL	LMC	03T	Salvation Army (ES)	80,000.00	Provides shelter for homeless families.	3737 Lawton St, Detroit MI 48208	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	100	Homeless person overnight shelter	Emergency shelter and transitional housing	X	N/A	N/A	N/A
CDBG	PSHL	LMC	05C	United Community Housing coalition (HP)	275,000.00	Legal services and financial assistance for those at-risk of homelessness.	2727 Second Ave., Suite 313 Detroit MI 48201	7/1/2022	6/30/2023	Decent Housing	Affordability	End Chronic Homelessness	People	395	Homelessness prevention	Prevention	X	N/A	N/A	N/A
CDBG	PSHL	LMC	03T	YWCA Interim House (ES)	51,728.56	Provides domestic abuse shelter for women and their children.	Suppressed	7/1/2022	6/30/2023	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	35	Homeless person overnight shelter	Emergency shelter and transitional housing	X	N/A	N/A	N/A
				PSHL Subtotal	2,589,426.50															
				Total PS & PSHL	5,178,853.00															
CDBG	REPAY	N/A	19F	Book Cadillac II Note 2	859,000.00	Repayment of Section 108 Loan	2 Woodward CAYMC, Detroit, MI 48226	7/1/2022	6/30/2023	N/A	N/A	N/A	Other	N/A	N/A	Other	N/A	N/A	N/A	N/A
CDBG	REPAY	N/A	24A	Book Cadillac II Note 2 (Interest)	54,115.00	Repayment of Section 108 Loan - Interest	2 Woodward CAYMC, Detroit, MI 48226	7/1/2022	6/30/2023	N/A	N/A	N/A	Other	N/A	N/A	Other	N/A	N/A	N/A	N/A
CDBG	REPAY	N/A	19F	Fort Shelby	1,709,000.00	Repayment of Section 108 Loan	2 Woodward CAYMC, Detroit, MI 48226+1110-V110	7/1/2022	6/30/2023	N/A	N/A	N/A	Other	N/A	N/A	Other	N/A	N/A	N/A	N/A
CDBG	REPAY	N/A	24A	Fort Shelby (Interest)	214,837.00	Repayment of Section 108 Loan - Interest	2 Woodward CAYMC, Detroit, MI 48226	7/1/2022	6/30/2023	N/A	N/A	N/A	Other	N/A	N/A	Other	N/A	N/A	N/A	N/A
CDBG	REPAY	N/A	19F	Garfield II - Note 1 - Garfield Estates (Principal)	468,732.00	Repayment of Section 108 Loan	2 Woodward CAYMC, Detroit, MI 48226	7/1/2022	6/30/2023	N/A	N/A	N/A	Other	N/A	N/A	Other	N/A	N/A	N/A	N/A
CDBG	REPAY	N/A	24A	Garfield II - Note 1 - Garfield Estates (Interest)	118,168.00	Repayment of Section 108 Loan - Interest	2 Woodward CAYMC, Detroit, MI 48226	7/1/2022	6/30/2023	N/A	N/A	N/A	Other	N/A	N/A	Other	N/A	N/A	N/A	N/A
CDBG	REPAY	N/A	24A	Garfield II Note 3 Sugar Hill (Interest)	125,066.00	Repayment of Section 108 Loan - Interest	2 Woodward CAYMC, Detroit, MI 48226	7/1/2022	6/30/2023	N/A	N/A	N/A	Other	N/A	N/A	Other	N/A	N/A	N/A	N/A
CDBG	REPAY	N/A	19F	Mexicantown	397,000.00	Repayment of Section 108 Loan	2 Woodward CAYMC, Detroit, MI 48226	7/1/2022	6/30/2023	N/A	N/A	N/A	Other	N/A	N/A	Other	N/A	N/A	N/A	N/A
CDBG	REPAY	N/A	24A	Mexicantown (Interest)	15,632.00	Repayment of Section 108 Loan - Interest	2 Woodward CAYMC, Detroit, MI 48226	7/1/2022	6/30/2023	N/A	N/A	N/A	Other	N/A	N/A	Other	N/A	N/A	N/A	N/A

CITY OF DETROIT

RESOURCES FOR AFFIRMATIVELY FURTHERING FAIR HOUSING

RESOURCE	FUNDING AMOUNT
Community Development Block Grant (CDBG)	
Delray United Action Council	\$68,905
Legal Aid and Defender	\$145,387
Fair Housing Awareness	\$50,000
United Community Housing Coalition	\$275,000
Total	\$539,292

RESOURCE	FUNDING AMOUNT
City Of Detroit General Fund	
Civil Rights Inclusion & Opportunity (CRIO) (Fair Housing complaints & outreach)	\$105,372

CITIZENS PARTICIPATION:

City of Detroit
Housing & Revitalization Department
Public Hearing 1
2022-2023 Annual Action Plan
Record of Public Hearing

Purpose: To receive citizen comments on the 2022-23 Annual Action Plan

Participants: **Housing & Revitalization Department, Grants Management Section**
Warren T. Duncan
Marlene Robinson
Jennifer Mahone

CITIZEN PARTICIPANTS
21 Individuals

Location: Virtual Community Engagement

Date & Time: July 13, 2022 6:00 pm – 7:00 pm

Summary:

The Housing & Revitalization Department (HRD) staff conducted the virtual public hearing. Mr. Duncan presented the Consolidated Plan and the Annual Action Plan process, the prior year 2021-2022 actual CDBG/NOF sub-recipient awards, program descriptions and Neighborhood Revitalization Strategy Area (NRSA) areas; and the upcoming CDBG/NOF application best practices webinar. All citizens had the opportunity to comment and present their opinions and questions regarding the 2022-2023 Annual Action Plan. The HRD website has a draft copy of the 2022-2023 Annual Action Plan for public review. Citizens can make comments at www.ConPlancomments@detroitmi.gov. Ms. Mahone presented local community resources. Ms. Robinson presented an overview of the Community Development Block Grant - Disaster Recovery (CDBG-DR) grant. There were 21 individual citizens and HRD staff in attendance. There were 9 citizens that had questions/comments.

Question/Comment 1:

Please explain section 108 loan repayments. Is there a cap for section 108 loan repayments? In short, are we allowing developers to neglect loans while they have businesses that render profits? Requesting more information regarding the history of section 108 loans (transparency).

Response to Question/Comment 1:

Section 108 Loans were used in the past to leverage the CDBG funds for large projects working with Developers. Example, The Book Cadillac Hotel and Fort Shelby Hotel.

Each Section 108 loan between the City of Detroit (Lender) and loan borrower (i.e. property owner/developer) has its own repayment requirement, in the form of a fully-executed Development and Loan Agreement and Payment Note. Each payment note determines what the loan borrower's repayment requirements are (i.e. principal and or interest payments on an annual, semi-annual or monthly basis, until loan maturity). We do not allow loan borrowers to neglect their Section 108 obligations. Our Asset Management Team reviews the annual financial statements of our Section 108 Loan Borrowers to determine the amount of cashflow available for Section 108 repayment after payment of operating expenses, reserve requirements and debt service senior to our Section 108 loan (when applicable).

Question/Comment 2:

Can you tell us what affordable housing developments will receive CDBG and/or HOME dollars directly and at what Area Median Income?

Response to Question/Comment 2:

HRD Grants Management can send you a list of the housing projects and will connect you with our Housing Underwriting team (Grants mgmt. will add a link to see a Pdf and excel file of housing projects - Smartsheet.)

Question/Comment 3:

Thank you for this important question-Detroit Affordable Housing and Homelessness Task Force. A request to receive a housing project list by email.

Response to Question/Comment 3:

HRD Grants Management can send you a list of the housing projects and will connect you with our Housing Underwriting team. (Grants mgmt. will add a link to see a Pdf and excel file of housing projects - Smartsheet.)

Question/Comment 4:

Will that housing project list be available to everyone?

Response to Question/Comment 4:

HRD Grants Management can send you a list of the housing projects. (Grants mgmt. will add a link to see a Pdf and excel file of housing projects - Smartsheet.)

Question/Comment 5:

Concerns related to HRD senior home repair program: (a) On waiting list for 10 years (b) Can a public home repair list be posted on website? i.e. Homes completed, type of repairs completed, status of list.

I was unsuccessful with Wayne Metro Community Action Agency (WMCAA) plumbing repair program. WMCAA did not have plumbers.

Response to Question/Comment 5:

The 0% Home Repair Loan is used as a leveraging resource. There is a greater need for home repair than available grant funds. A total of 360 homes were repaired in 2021. There is a 3 to 5 year wait list. The link to the annual report is on our website. Home repair and information is on pages/slides 33-37.

<https://detroitmi.gov/sites/detroitmi.localhost/files/2022-07/HRD%202021%20Annual%20Report%20Final.pptx%20%281%29.pdf>

Question/Comment 6:

Concerns about the risk of City of Detroit HUD grant funds and the 28 HUD findings. How has HRD resolved these finding? Can I receive a copy of HRD response to HUD?

Response to Question/Comment 6:

HRD responded to the 28 findings. We are still waiting for a response from HUD. Standard Operating Procedures (SOP) were created because of the findings. HRD will check with HUD about sharing responses with citizens once finalized.

Question/Comment 7:

When was the NRSA areas established?

Response to Question/Comment 7:

The NRSA was established in 2015. The NRSA was renewed in 2020.

Question/Comment 8:

What is HRD strategy for Limited English Proficient (LEP) individuals?

Response to Question/Comment 8:

The City of Detroit, Civil Rights, Inclusion & Opportunity (CRIO) department provides ASL interpreter and document translation services to City of Detroit agencies. There are two ASL interpreters at the 2022 Action Plan public hearing. LEP is a part of the HRD Citizenship Participation plan.

Question/Comment 9:

Can I get grant repair for my inherited home from the disaster not my primary home? We need more grants not loans.

Response to Question/Comment 9:

CDBG-DR questions will be forwarded to the HRD Disaster Recovery team lead. For CDBG-DR updates, go to HRD website and Facebook; or call HRD office. A HRD Disaster Recovery website is coming soon.

City of Detroit
Housing & Revitalization Department
Public Hearing 2
2022-2023 Annual Action Plan
Record of Public Hearing

Purpose: To receive citizen comments on the 2022-23 Annual Action Plan

Participants: **Housing & Revitalization Department, Grants Management Section**
Warren T. Duncan
Marlene Robinson
Jennifer Mahone

CITIZEN PARTICIPANTS
47 Individuals

Location: Virtual Community Engagement

Date & Time: July 20, 2022, 6:00 pm – 7:00 pm

Summary:

The Housing & Revitalization Department (HRD) staff conducted the virtual public hearing. Mr. Duncan presented the Consolidated Plan and the Annual Action Plan process, the prior year 2021-2022 actual CDBG/NOF sub-recipient awards, program descriptions and Neighborhood Revitalization Strategy Area (NRSA) areas; and the upcoming CDBG/NOF application best practices webinar. All citizens had the opportunity to comment and present their opinions and questions regarding the 2022-2023 Annual Action Plan. The HRD website has a draft copy of the 2022-2023 Annual Action Plan for public review. Citizens can make comments at www.ConPlancomments@detroitmi.gov. Ms. Mahone presented local community resources. Ms. Robinson presented an overview of the Community Development Block Grant - Disaster Recovery (CDBG-DR) grant. There were 47 individual citizens and HRD staff in attendance. There were 16 citizens that had questions/comments.

Question/Comment 1:

I have been trying to get assistance for my home. I have been told to send in several documents which I have done. I have been doing follow-up calls and no one calls back. I truly do not want to lose my home.

Response to Question/Comment 1:

Please email your contact information to ConPlancomments@detroitmi.gov.

Question/Comment 2:

As a tenant how does one access this? (Disaster Recovery)

Response to Question/Comment 2:

The CDBG-DR grant is still in its early stages, but if you are a tenant of a home that was affected by the flooding last year, more than likely the homeowner/your landlord would have to apply and qualify for the funding.

Question/Comment 3:

Can you provide the actual email for updates? Thanks.

Response to Question/Comment 3:

For updates, please email HRD at ConPlancomments@detroitmi.gov.

Question/Comment 4:

This information is helpful, but the issue is getting someone to call you back.

Response to Question/Comment 4:

Please email your contact information to ConPlancomments@detroitmi.gov.

Question/Comment 5:

LaShaun, some situations are the owners are not easily accessed. Other times Landlords do not want to apply. So, the tenant is stuck. What can the tenant do when needing the support?

Response to Question/Comment 5:

Certainly understandable. For this grant in particular because this is in its very early stages, we do not have an answer to that just yet. As Warren just mentioned, this may not be available until next year. I suggest keeping up with the website to see when it kicks off. Then we may be able to better answer/address your concern.

Question/Comment 6:

I want to see not just the homelessness funds report, but ALL the grant allocations. I am especially interested in seeing where in the city these funds are being deployed.

Response to Question/Comment 6:

(a) You can see a draft of our 22'23 action plan here. Breakdown of funding allocations and awards appear toward the end in the appendices:

<https://detroitmi.gov/sites/detroitmi.localhost/files/2022-07/2022-23%20Annual%20Action%20Plan%20%28Draft%29.pdf>

(b) For reports on homelessness, you can visit HAND's website at <https://www.handetroit.org/reports>.

Question/Comment 7:

I have a follow up question from last week - how are we addressing or changing the way were administering federal programs such as these to the correct the 28 findings from the HUD monitoring report that was released last fall so that we don't jeopardize future allocations?

Response to Question/Comment 7:

Please email your contact information to ConPlancomments@detroitmi.gov.

Question/Comment 8:

Thank you LaShaun for your response. I would like to see it a process included for the tenant to be able to apply for the disaster relief.

Response to Question/Comment 8:

I wrote your comment down to take back to the group. Again, there will be a website that you can reference for updates.

Question/Comment 9:

How many affordable housing developments (apartments) are in Detroit? Where can I find the AMI for individuals applying for affordable housing? I own land and would like to develop an apartment building on my land. Can you assist me with the steps of developing an affordable apartment for low-income people? Current housing developments are not affordable.

Response to Question/Comment 9:

For your first question, please keep an eye out for an announcement from HRD soon on an affordable housing portal being developed to provide all those details about AMI and affordability by development in one place.

We can direct you with DLBA Detroit Land Bank Authority regarding building projects on your own land? The AMI is published on HUD's website. I can email you the current AMI. Please email additional questions to ConPlancomments@detroitmi.com.

Question/Comment 10:

Concerns:

- a. Information is not easily accessible to homeless and challenged individuals (about programs).
- b. I am a mentor to a homeless person. This person lives at a homeless shelter (St. John in Detroit, MI) whose policy is to not save a spot for an individual who wanted to attend a non-local job training program. The shelter wanted residents to work/train near the shelter. CAM Detroit homeless shelter is a hit or miss.
- c. Can the AMI change for affordable housing developments? Affordable housing developments are in communities where SSI and SSD individuals live. However, the rent is not affordable.

Response to Question/Comment 10:

If this situation is related to an emergency shelter, contact linznert@detroitmi.gov for assistance (to investigate). We want people to work and have an income. A training location should not affect a homeless person stay at shelter. Homeless assistance is available at CAM Detroit, located at 1600 Porter, Detroit, MI.

Question/Comment 11:

How do you find out who receives HUD grants and how grants are allocated? i.e., name of nonprofit who received grant, who applied, persons served, repairs made

Response to Question/Comment 11:

The ESG grant application (subrecipient) process was briefly explained. The clients that are served by the homeless solution programs are entered into a Homeless Management Information System database (HMIS). You can see the number of people served, racial information, demographics, who is moving in and out of supportive housing and outcomes. The HRD subrecipients is located on HRD website. We are unable to provide names of persons served and shelter information

(protected information). We will list information from our CAPER report regarding accomplishments. www.detroitmi.gov/hrd, HUD Consolidated Plan.

Question/Comment 12:

I want to ask about the Disaster Recovery funds. In the presentation, the city was allocated \$57.5 million in disaster recovery funds. Is the money going to individuals or organizations? Will individuals apply through organizations? How do organizations find out how they can apply for funds?

Response to Question/Comment 12:

HRD are in the early stage of preparing the grant application. HUD must approve an action plan before receiving the grant, along with city council approval. Funds will not be available until the beginning of 2024. There will be a dedicated website for CDBG-DR. As information becomes available, HRD will update its website.

Question/Comment 13:

- a. Is the Action Plan (presentation) the same as the affordable housing development plan referenced in the July 2022 NOFA, up to \$10 million?
- b. How do we address homelessness and temporary housing? A homeless person can be displaced without a permanent address for a long time (a year).

Response to Question/Comment 13:

- a. The Action Plan is a separate application. The Action Plan is for our annual allocations of CDBG, HOME, HOPWA and ESG grants.
- b. HUD definition for the homeless:
 1. A person without primary residence for one night is called homeless
 2. A person without primary residence for one year or 4 episodes within one year is called chronically homeless.

To use ESG funds a person must be “at risk” for homelessness or literally homeless. Homeless prevention funds are used for households that are at-risk of homelessness.

Question/Comment 14:

I know HRD is in its beginning phase (disaster recovery action plan). It is easy for landlords to access the grant. However, tenants have issues getting in contact with landlords i.e., LLC, landlord lives out of state or not interested. Tenants and their families should not continue to suffer with infrastructure (flooding and damage). I would like to see a way and a process that tenants themselves can apply for the disaster recovery grant.

Response to Question/Comment 14:

That is some of the issues among our grants. The landlord does want to participate because they must show a lot of information. Unfortunately, the tenant does not benefit from this. We will take your comment into consideration.

Question/Comment 15:

What neighbors are receiving grant funds? How much money has been allotted in the Brightmoor Area?

Response to Question/Comment 15:

The Brightmoor Area is included in our [Risk Assessment Visualization \(NRSA\)](#). Organizations receiving funds, beneficiaries', and information about Brightmoor neighborhood can be found in our CAPER report. The CAPER report (HRD website) has a series of maps that show funding areas. Please email your contact information to ConPlancomments@detroitmi.gov for additional information.

Question/Comment 16:

I live in the area code of 48202 and was affected by the flood. I need help with a furnace because of flooding. What is the AMI for individuals to apply for assistance?

Response to Question/Comment 16:

If your AMI is over 80% you can apply for the 0% Interest Home Repair loan program. Information is on HRD website.

BUSINESS

VanDyke

Continued from Page 8A

plaints. One dealer backed down from a \$10,000 markup.

On June 15, John Lawler, Ford chief financial officer, told Deutsche Bank analysts, "We're going to be very selective with our Model e (car) dealers."

Now VanDyke won't be a part of that transition.

'Dramatically changing'

His new employer, Shift Digital, touted VanDyke's marketing and sales strategy at Ford, where he led the digital consumer experience and retail go-to-market strategies, communications and revenue management, according to Ford's website.

His jobs at Ford included director of U.S. marketing, vice president of marketing for Ford of Europe and director of Lincoln global marketing, sales and service. He also led the start of various digital and retail consumer experiences, the rollout of new Ford websites, and the development and introduction of e-commerce activity, according to Ford's website.

"Consumer purchasing habits are dramatically changing as more individuals embrace the digital buying experience, and it is critical that automakers and dealers deliver an exceptional consumer experience at the brand level and dealers' individual sites," VanDyke said in the Shift Digital news release Tuesday.

"The opportunity to join Shift Digital enables me to expand my knowledge and impact

more brands and retailers as the industry goes through this digital evolution," he said.

Oriani, calling VanDyke a "rare" cultural fit with the new company, praised his vast experience with brand management and dealer advocacy.

'Passion'

On Jan. 15, 2021, a news release from FordDirect said VanDyke would lead the team responsible for uniting the worlds of digital, data and technology to deliver "best-in-class marketing and advertising solutions to Ford and Lincoln Dealers."

Ford called him "a passionate marketer with worldwide expertise in automotive brand positioning," who made experiences better for consumers and dealerships.

FordDirect was labeled a joint venture between Ford and its franchise owners, and VanDyke was credited with transformational efforts.

VanDyke joined Ford in 2008. He led Ford and Lincoln advertising, launched more than 15 new vehicles, and championed brand and retail campaigns to help transform the opinion of the Ford brand, according to the Ford website.

In 2012, he and his team began rebranding and developing a new product and experience strategy for Lincoln. In 2016, he became director for Global Lincoln, leading the luxury brand's marketing, sales and service team.

VanDyke earned a bachelor's degree in business administration from Miami University.

Contact Phoebe Wall Howard at 313-618-1034 or phoward@freepress.com. Follow her on Twitter @phoebesaid.

Fine Designer Furniture | Stunning Accessories

BUILDING SOLD

EVERYTHING MUST GO WALL TO WALL

Bedroom • Dining Room • Living Room • Home Office • Home Accents

Largest Stressless Showroom within 130 Miles

6644 Orchard Lake Road just S of Maple West Bloomfield

248.855.1600 • Mon - Sat 10-6 Sun 12-5

www.sherwoodstudiosinc.com

When you need us.

The Detroit Free Press app goes where you go.

Detroit Free Press

PART OF THE USA TODAY NETWORK

www.freep.com

Final Notice and Public Explanation of a Proposed Activity in a 100-Year Floodplain

To: All interested Federal, State and Local Agencies, Groups and Individuals

This is to give notice that the City of Detroit has conducted an evaluation as required by Executive Order 11988 in accordance with HUD regulations at 24 CFR 55.20 Subpart C Procedures for Making Determinations on Floodplain Management. The activity is funded under the Home Funding Program under Title II of the National Affordable Housing Act of 1990 and Project Based Vouchers (PBV's) from the Detroit Housing Commission. The proposed project is located at 7850 E. Jefferson in Detroit, Michigan.

The proposed project is located at 7850 E. Jefferson in Detroit, Wayne County, Michigan and includes the re-evaluation of the new construction of a 225-unit rental apartment community to be built in two concurrent identical 75-unit phases and one future 75-unit phase on approximately 3.8 acres of vacant land. The purpose is to construct much needed affordable housing in the greater downtown Detroit area, especially with access to the Detroit Riverfront. The southern portion of the property near the Detroit River, including a new seawall and walkway, are located within the Special Flood Hazard Area (the 100-year floodplain) as indicated on the FEMA Preliminary Flood Insurance Rate Map (FIRM) 26163CO301F dated December 21, 2018. HOME funds and Detroit Housing Commission PBV's will be used in the financing of this project. The project proposes to place 2,035 cubic yards of fill within 0.57 acres of the 100-year floodplain

The City of Detroit has considered the following revised alternatives and mitigation measures to be taken to minimize adverse impacts and to restore and preserve natural and beneficial values: The first alternative considered was to move the project to a different location. This alternative would not be feasible, since this alternative would not provide low-income families direct access to the riverfront. The second alternative considered was to construct a new seawall and modify the floodplain through a conditional Letter of Map Revision (LOMR). This would remove the buildings from the floodplain. This option is the optimal alternative, as it will significantly reduce the project's impact to human life, property, and the floodplain. The third alternative considered was to re-orient buildings to reduce impact. This alternative would not be feasible, since there are poor soils on the southeastern quadrant of the site. The fourth alternative considered was eliminate parking or a zoning variation to reduce parking. This alternative is not feasible as it requires special approvals to below minimum standards. The fifth alternative considered was to reorient parking on the site. The is alternative would not be feasible as the parking would be inefficient and prevent meeting the minimum parking standards.

The City of Detroit has reevaluated the alternatives to building in the floodplain and has determined that it the second alternative was the most feasible. Environmental files that document compliance with steps 3 through 6 of Executive Order 11988, are available for public inspection, review and copying upon request at the times and location delineated in the last paragraph of this notice for receipt of comments.

There are three primary purposes for this notice. First, people who may be affected by activities in floodplains and those who have an interest in the protection of the natural environment should be given an opportunity to express their concerns and provide information about these areas. Second, an adequate public notice program can be an important public educational tool. The dissemination of information and request for public comment about floodplains can facilitate and enhance Federal efforts to reduce the risks and impacts associated with the occupancy and modification of these special areas. Third, as a matter of fairness, when the Federal government determines it will participate in actions taking place in floodplains, it must inform those who may be put at greater or continued risk.

Written comments must be received by the City of Detroit's Housing and Revitalization Department at the following address on or before June 30, 2022.

City of Detroit Housing & Revitalization Department
 2 Woodward Avenue, Suite 908
 Detroit, MI 48226
 dwoinenp@detroitmi.gov
 Attention: Penny Dwoinen, Environmental Review Officer

A full description of the project may also be reviewed on the City of Detroit's Housing & Revitalization Public Notice page <https://detroitmi.gov/departments/housing-and-revitalization-department/public-notices>. Comments may also be submitted via email at dwoinenp@detroitmi.gov.

Date: June 22, 2022.

CITY OF DETROIT

HOUSING AND REVITALIZATION DEPARTMENT

MICHAEL E. DUGGAN, MAYOR

SUMMARY AND NOTICE OF PUBLIC HEARING ON

2022-23 DRAFT ANNUAL ACTION PLAN

The City of Detroit through its Housing and Revitalization Department (HRD) will conduct (2) virtual public hearings regarding the 2022-23 Draft Annual Action Plan. The virtual conference meetings are scheduled for **Wednesday, July 13, 2022 from 6:00 PM to 7:00 PM and Wednesday, July 20, 2022 from 6:00 PM to 7:00 PM.**

The City's last Annual Action Plan covered the City's fiscal year (FY) 2021-22. The City is in the process of preparing the 2022 Annual Action Plan covering FY 2022-23.

There will be (2) virtual community public hearings held to obtain citizens input necessary for the Annual Action Plan. This year the first meeting will be held as shown below.

Public Hearing 1

Wednesday, July 13, 2022

6:00 PM – 7:00 PM

Registration and zoom information can be obtained by visiting HRD website at: www.detroitmi.gov/hrd (click on HUD Consolidated Plans)

Public Hearing 2

Wednesday, July 20, 2022

6:00 PM – 7:00 PM

Registration and zoom information can be obtained by visiting HRD website at: www.detroitmi.gov/hrd (click on HUD Consolidated Plans)

During the public hearings, HRD staff will describe the contents of past plans and the types of activities that may be undertaken using program funds. Hearing participants will be given the 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 hearings will focus on these matters and is not held to discuss funding for particular organizations or other non-related matters. Citizens may also submit comments by email at ConPlanComments@detroitmi.gov on or before July 26, 2022.

This notice will be posted on the City of Detroit website at: <http://www.detroitmi.gov/hrd> from there click on, HUD Consolidated Plans.

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

NOTICE OF FINDING OF NO SIGNIFICANT IMPACT AND NOTICE OF INTENT TO REQUEST FOR RELEASE OF FUNDS

June 22, 2022

City of Detroit, Housing and Revitalization Department
 Coleman A. Young Municipal Center, 2 Woodward Ave., Suite 908
 Detroit, Michigan, 48226
 Telephone: 313.224.2933

In accordance with 24 CFR 58.43 and 58.70, this notice shall satisfy two separate but related procedural requirements for activities undertaken by the City of Detroit.

REQUEST FOR RELEASE OF FUNDS

On or about July 11, 2022 and in accordance with 24 CFR 58.71, the City of Detroit will submit a request to the U.S. Department of Housing and Urban Development (HUD) Detroit Field Office for the release of 1. HOME Funds authorized under Title II of the National Affordable Housing Act of 1990 (HOME), and 2. Project Based Vouchers from the Detroit Housing Commission, to undertake a project known as:

Project Title: 7850 E. Jefferson, Detroit, Michigan.

For the Purpose Of: Re-evaluation of new construction of a 225-unit rental apartment community to be built in two concurrent identical 75-unit phases and one future 75-unit phase on approximately 3.8 acres of vacant land. Each building includes community rooms, office space, a rooftop outdoor patio, exercise facilities and shared laundry facilities. The southern portion of the property near the Detroit River will include a walking path and playground. Additionally, the property will include on-site parking for residents.

Mitigation Measures/Conditions/Permits: 1. Remedial action must be employed under the guidance of the Michigan Department of the Environment, Great Lakes and Energy (EGLE) to address onsite contaminants. 2. Floodplain actions must be employed under guidance of the Michigan EGLE to complete work in the floodplain. 3. Hours of construction shall be in accordance with local code to mitigate temporary construction phase noise.

FUNDING

HOME - \$3,432,000
 DHC Project Based Vouchers - 36

FINDING OF NO SIGNIFICANT IMPACT

The City of Detroit has determined that the activities proposed will have no significant impact on the human environment. Therefore, an Environmental Impact Statement under the National Environmental Policy Act of 1969 (NEPA) is not required. An Environmental Review Record (ERR) that documents the environmental determinations for this project is available on the City of Detroit's Housing and Revitalization Department Website's Public Notice section: <https://detroitmi.gov/departments/housing-and-revitalization-department/public-notices>.

PUBLIC COMMENTS

Any individual, group, or agency may submit oral or written comments on the ERR to Penny Dwoinen, the City of Detroit Environmental Review Officer at telephone: 313.224.1508 or email: dwoinenp@detroitmi.gov. All comments received by July 8, 2022 will be considered by the City of Detroit prior to authorizing submission of a request for release of funds. Comments should specify which Notice they are addressing.

ENVIRONMENTAL CERTIFICATION

The City of Detroit certifies to HUD that Ms. Julie Schneider, in her capacity as Certifying Officer consents to accept the jurisdiction of the Federal Courts if an action is brought to enforce responsibilities in relation to the environmental review process and that these responsibilities have been satisfied. HUD's approval of the certification satisfies its responsibilities under NEPA and related laws and authorities and allows the HOME recipient to use Program funds.

OBJECTIONS TO RELEASE OF FUNDS

HUD will accept objections to its release of funds and the City of Detroit's certification for a period of fifteen (15) days following the anticipated submission date or its actual receipt of the request (whichever is later) only if they are on one of the following bases: (a) the certification was not executed by the Certifying Officer of the City of Detroit; (b) the City of Detroit has omitted a step or failed to make a decision or finding required by HUD regulations at 24 CFR part 58; (c) the grant recipient or other participants in the development process have committed funds, incurred costs or undertaken activities not authorized by 24 CFR Part 58 before approval of a release of funds by HUD; or (d) another Federal agency acting pursuant to 40 CFR Part 1504 has submitted a written finding that the project is unsatisfactory from the standpoint of environmental quality. Objections must be prepared and submitted in accordance with the required procedures (24 CFR Part 58, Sec. 58.76) and shall be addressed to Ms. Kathy Bagley, CPD Representative at CPD_COVID-19QEE-DET@hud.gov or Ms. Michelle King, PH Representative, Detroit Field Office at Environmental-PublicComments@hud.gov. Potential objectors should contact Ms. Kathy Bagley or Ms. Michelle King via e-mail to verify the actual last day of the objection period.

NOTICE OF NON-DISCRIMINATION

The City of Detroit does not discriminate on the basis of age, color, creed, handicap, national origin, race, sex or sexual orientation. Persons or groups with discrimination complaints may file those complaints with the City of Detroit Human Rights Department, 2 Woodward Avenue, Suite 1026, Detroit, Michigan, 48226.

Ms. Julie Schneider, Director, Housing and Revitalization Department, City of Detroit

DF-0008789088



**Housing and
Revitalization
Department**

The City of Detroit invites all community organizations, neighborhood residents, business organizations and other stakeholders, who wish to participate in the development and implementation of the U.S. Department of Housing and Urban Development (HUD) 2022-23 Annual Action Plan

Background

As a jurisdiction that receives funding directly from HUD, the City of Detroit is required to develop a Consolidated Plan to inform its use of annual HUD funds, which include the following four programs:

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

2022-23

Annual Action Plan

The City of Detroit will hold two (2) virtual public hearings on the 2022-23 Annual Action Plan for community residents, organizations and stakeholders.

PUBLIC HEARING 1

**Wednesday, July 13, 2022
6-7 p.m.**

Join via ZOOM

[https://cityofdetroit.zoom.us/
j/85848769386](https://cityofdetroit.zoom.us/j/85848769386)

Meeting ID: 858 4876 9386
Call in option: (267) 831-0333

PUBLIC HEARING 2

**Wednesday, July 20, 2022
6-7 p.m.**

Join via ZOOM

[https://cityofdetroit.zoom.us/
j/83676049138](https://cityofdetroit.zoom.us/j/83676049138)

Meeting ID: 836 7604 9138
Call in option: (267) 831-0333

Meeting Outline

- Overview of the Consolidated/Annual Action Plan including funding allocations
- 2022-23 Proposed Budgeted Projects and Activities
- Disaster Recovery (Flood Grant)
- Community Resources



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

Published September 2018
Updated April 2019

Table of Contents

Section 1: General Information and Background	10
Purpose of This Document	10
How to Use This Document	10
Guiding Principles	10
What is ESG?	11
City of Detroit Contact Information	11
Frequently Used Terms and Definitions	12
Section 2: Funding Process and Requirements	20
Summary	20
Grant Awards and Spending Requirements	20
Eligible Subrecipients	21
Subrecipient Requirements	22
<i>Leadership & Management</i>	22
HUD Requirements	22
<i>Other HUD Requirements</i>	22
Match Requirements	23
<i>Federal Requirements</i>	23
<i>Subrecipient Requirements</i>	24
Documenting Match Requirements	24
Section 3: Coordinated Entry Systems	25
Summary	25
Coordinated Assessment Model (CAM) Processes for Linkage to Shelter	26
<i>Making a CAM referral</i>	27
<i>CAM Coordination Expectations</i>	28
<i>CAM Coordination Related to Housing Choice Vouchers (HCV)</i>	29
<i>Rapid Re-Housing (RRH) Providers</i>	29
<i>Written Standards Requirements</i>	30
Section 4: Principles of Best Practice	31

Summary	31
Equal Access to Housing Regardless of Sexual Orientation or Gender Identity	31
<i>Reasonable Accommodations/Modifications</i>	33
<i>Americans With Disabilities Act (ADA) Compliance</i>	33
Low-Barrier	34
Federal Fair Housing Act	34
Termination of Assistance	35
Client Confidentiality and Privacy Policies	35
Homeless Management Information Systems (HMIS) Requirements	36
Section 5: Overview of ESG Program Components	38
Summary	38
Program Components	38
Section 6: Street Outreach	39
Summary	39
<i>Guidelines for Street Outreach Best Practice</i>	39
Street Outreach Code Blue Situations	40
Street Outreach Eligible Activities	40
<i>Street Outreach Client Files</i>	43
Section 7: Emergency Shelter	45
Summary	45
Goals of Emergency Shelter	45
Eligible Emergency Shelter Activities	45
Shelter Provider Expectations	45
Performance Benchmarks	46
Expectations for Shelter Staff Training	46
Involuntary Family Separation	47
Types of Emergency Shelters	48
<i>Single-Sex Shelters</i>	48
<i>Warming Centers</i>	48
<i>Family Shelter</i>	48
Essential Services	49
<i>Case Management</i>	49
<i>Childcare</i>	50

<i>Education Services</i>	50
<i>Employment Assistance and Job Training</i>	50
<i>Outpatient Health Services</i>	50
<i>Legal Services</i>	51
<i>Life Skills Training</i>	51
<i>Mental Health Services</i>	51
<i>Substance Abuse Treatment Services</i>	52
<i>Transportation</i>	52
<i>Services for Special Populations</i>	52
Renovation/Rehabilitation of Buildings	53
Shelter Operations	53
<i>Health and Safety Protocol</i>	54
<i>Essential Services and Shelter Operations</i>	54
<i>Implementing Assistance Under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA)</i>	54
<i>Minimizing Displacement</i>	54
<i>Temporary Relocation Not Permitted</i>	54
<i>Relocation Assistance for Displaced Persons</i>	54
<i>Displaced Person</i>	55
Shelter Habitability and Lead Requirements	56
<i>Emergency Shelter</i>	56
<i>Lead-Based Paint Requirements</i>	57
Emergency Shelter Operational Policies	58
<i>Religion</i>	58
<i>Service Animals</i>	58
<i>Shelter Resident Death</i>	59
<i>Shelter Resident Personal Belongings</i>	59
<i>Shelter Resident Money and Valuables</i>	60
<i>Shelter Resident Prescription Medications</i>	60
<i>Substance Use</i>	60
<i>Weapons</i>	61
<i>Violent Behavior</i>	61
Intake Procedures for Emergency shelters	62

<i>Hours of Operations</i>	62
<i>Intake Procedures</i>	63
Provision of Services	64
<i>Case Management Services</i>	64
<i>Special Population Considerations</i>	64
<i>Serving Unique Populations</i>	64
<i>Families with School-Aged Children</i>	64
<i>Mandated Reporting</i>	65
<i>Criminal History</i>	65
<i>Alcohol and Substance Use and Abuse</i>	65
<i>HIV/AIDS</i>	66
Exit Policies for Shelter Residents	66
<i>Warnings</i>	67
<i>Daily Assessments</i>	67
<i>Suspension</i>	67
<i>Ban</i>	67
<i>Participant Discharge/ Termination of Assistance</i>	69
<i>Discharge Procedure</i>	69
Emergency Shelter Client Files	71
<i>General Program Documentation</i>	71
<i>Other Emergency Shelter Documentation</i>	71
Section 8: Homelessness Prevention and Rapid Re-Housing Introduction	74
Summary	74
Section 9: Homelessness Prevention	75
Summary	75
Rental Assistance for Homelessness Prevention	75
Housing Relocation and Stabilization Services	76
<i>Financial Assistance</i>	76
<i>Security Deposits</i>	76
<i>Last Month's Rent</i>	76
<i>Utilities</i>	76
<i>Utility Deposits</i>	76
<i>Utility Payments</i>	77

<i>Rental Application Fees</i>	77
<i>Moving Costs</i>	77
<i>Stabilization Services</i>	77
Homeless Prevention Client Files	79
<i>General Program Documentation</i>	79
Housing Inspection Requirements	80
Lead-Based Requirements	81
Fair Market Rent and Rent Reasonableness Requirements	83
<i>Rent Reasonableness</i>	83
<i>Fair Market Rent (FMR)</i>	83
<i>Documentation of Income (Homelessness Prevention)</i>	84
<i>Documentation of Lack of Resources (At Intake)</i>	90
<i>Recertification of Income and Lack of Resources</i>	90
Calculating Rental and Program Assistance Payments	90
Leases and Rental Assistance Agreements	91
Section 10: Rapid Re-Housing	92
Summary	92
Rapid Re-Housing Benchmarks and Goals	92
Determining Rapid Re-Housing Participant Eligibility	93
<i>Referrals</i>	93
<i>Rapid Re-Housing Prioritization and Referral Process</i>	93
<i>Referral to Rapid Re-Housing Providers</i>	94
Documentation of Eligibility	95
<i>Rapid Re-Housing Programs Referral Refusals</i>	95
Rapid Re-Housing Program Transfers	96
Rapid Re-Housing Referral and HMIS	97
<i>Post Referral HMIS Workflow</i>	97
Client Files	98
<i>General Program Documentation</i>	98
<i>Use of Standardized Rapid Re-Housing Forms</i>	98
<i>Client File Maintenance</i>	99
Housing Relocation and Stabilization Services	99
<i>ESG Eligible RRH Activities</i>	99

<i>Financial Assistance</i>	99
<i>Security Deposits</i>	99
<i>Last Month's Rent</i>	99
<i>Utilities</i>	100
<i>Utility Deposits</i>	100
<i>Utility Payments</i>	100
<i>Rental Application Fees</i>	100
<i>Moving Costs</i>	100
<i>Stabilization Services</i>	100
<i>Detroit RRH Supportive Services</i>	102
<i>Expectations for Rapid Re-Housing Staff Training</i>	103
Rental Assistance for Rapid Re-Housing	104
<i>Documentation of Income - Rapid Re-Housing</i>	104
<i>Documentation of Lack of Resources at Recertification</i>	110
Calculating Rental and Program Assistance Payments	110
<i>Maximum Rental Assistance Allowed</i>	110
Leases and Rental Assistance Agreements	110
Fair Market Rent and Rent Reasonableness Requirements	111
<i>Rent Reasonableness</i>	112
<i>Fair Market Rent (FMR)</i>	112
Inspection Requirements	112
Lead-Based Requirements	114
<i>Termination from Rapid Re-Housing</i>	115
Section 11: HMIS	117
Summary	117
Eligible HMIS Activities	117
Section 12: Eligible Participation and Recordkeeping	118
Introduction to Determining Eligibility for ESG Programs	118
Introduction to Recordkeeping	119
Written Standards Requirements for Subrecipients	120
Detailed Documentation Options and Types	120
<i>Intake/Discharge Forms</i>	120
<i>Case/Service Notes</i>	122

<i>HMIS/Comparable Database Release</i>	122
Section 13: Grant Administration	123
Agency Recordkeeping and Reporting Requirements	123
<i>Street Outreach: Category 1 Literally Homeless Clients</i>	125
<i>Street Outreach: Category 4 Fleeting/Attempting to Flee Domestic Violence Clients</i>	125
<i>Documenting Emergency Shelter Homeless Status</i>	126
<i>Emergency Shelter: Category 1 Literally Homeless Clients</i>	126
<i>Emergency Shelter: Category 4 Fleeting/Attempting to Flee Domestic Violence Clients</i>	127
<i>Documenting Homeless Prevention</i>	128
<i>Homeless Prevention: Category 2 Imminent Risk of Homelessness Clients</i>	128
<i>Homeless Prevention: Category 4 Fleeting/Attempting to Flee Domestic Violence Clients</i>	128
<i>Homeless Prevention: Additional Limitations on Eligibility</i>	129
<i>Homeless Prevention: At Risk of Homelessness</i>	129
<i>Rapid Re-Housing: Category 1 Literally Homeless Clients</i>	131
<i>Rapid Re-Housing: Category 4 Fleeting/Attempting to Flee DV</i>	132
Period of Record Retention	132
Access to Records	132
Conflict of Interest	133
Non-Discrimination, Equal Opportunity, and Affirmative Outreach	134
Uniform Administrative Requirements	134
Environmental Review Responsibilities	134
Davis-Bacon Act	135
Procurement of Recovered Materials	135
Section 504 of the Rehabilitation Act of 1973	135
Faith-Based Activities	135
Lobbying Requirements	136
Financial Management and Procurement Requirements	136
Section 14: Program Monitoring	137
Summary	137
Monitoring Process	137
On-Site Monitoring	137
Remote Monitoring	138
The Monitoring Visit	138

Entrance Conference	138
During the Visit	139
Exit Conference	139
After the Monitoring Visit	139
Appendices Index	140

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	<p>Household presents in person at a CAM Access Point.</p> <p>Access Points hours and locations can be found at: www.camdetroit.org</p>	<p>Household presents directly to Emergency Shelter.</p> <p>Emergency Shelter staff assists household with shelter placement.</p> <p>Client is referred to CAM Access Point for intake within 48 hours of shelter request.</p>	<p>Street Outreach team conducts CAM intake, documentation, and shelter/warming center referral.</p> <p>Street Outreach team assists with shelter placement and transportation.</p>

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.



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.

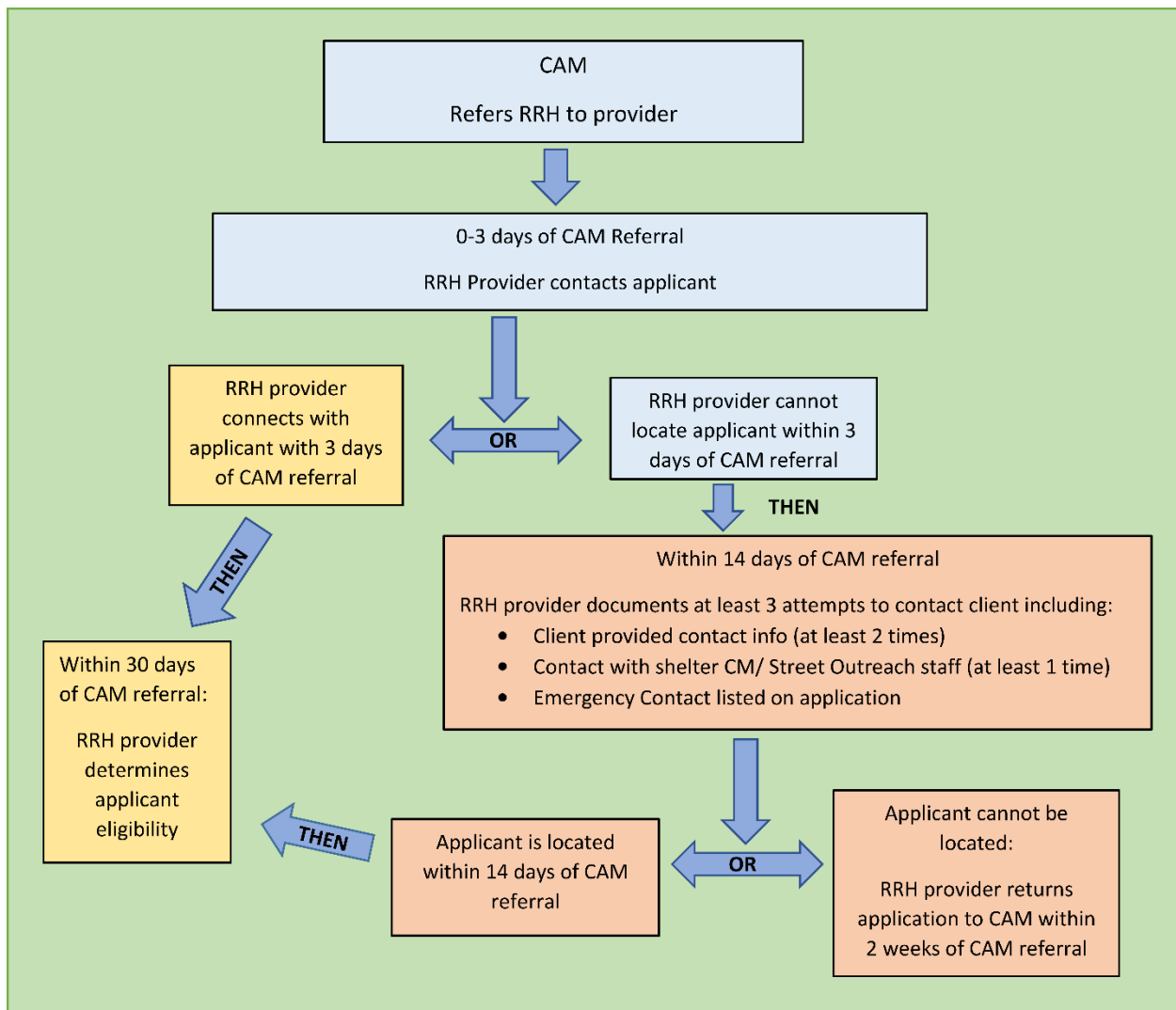
Housing Choice Voucher (HCV) - Security Deposit Only

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

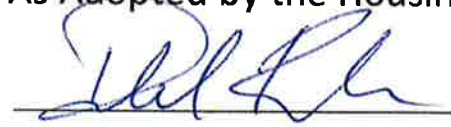
h




CITY OF DETROIT
HOUSING & REVITALIZATION DEPARTMENT

RESIDENTIAL ANTI-DISPLACEMENT &
RELOCATION ASSISTANCE PLAN

As Adopted by the Housing and Revitalization Department


Director


Date

Contents

I.	Introduction	3
II.	Minimizing Displacement	3
III.	Relocation Assistance	3
IV.	Additional requirements.....	6
V.	One-For-One Replacement of Lower-Income Dwelling Units	6
VI.	Appeals	7

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).

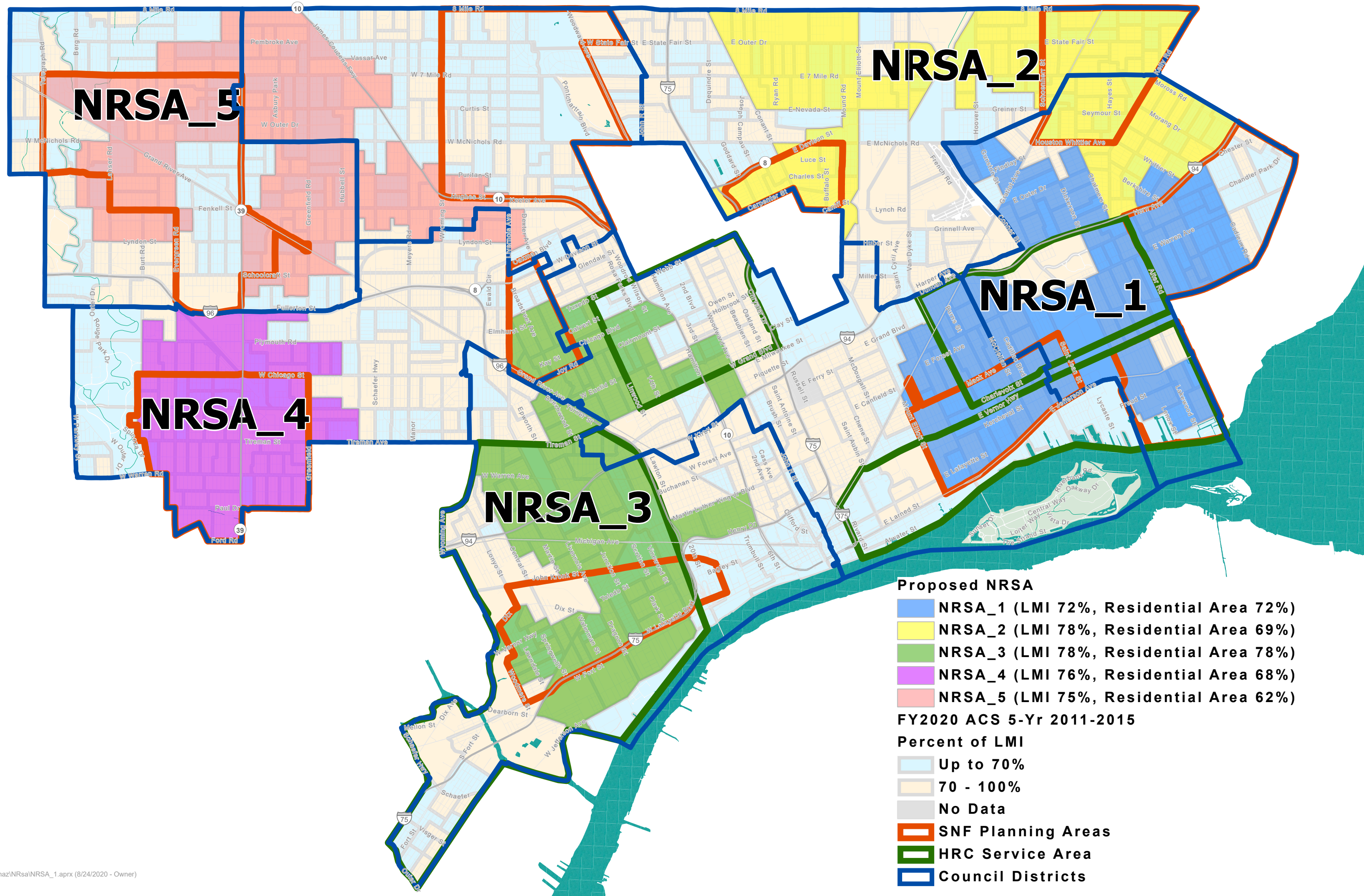
To the extent that the specific location of the replacement dwelling units and other data in items 4 through 7 were not available at the time of the general submission, the City would identify the general location of such dwelling units on a map and complete the disclosure and submission requirements 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.

MAPS:



NRSA_2

NRSA_5

NRSA_1

NRSA_4

NRSA_3

Proposed NRSA

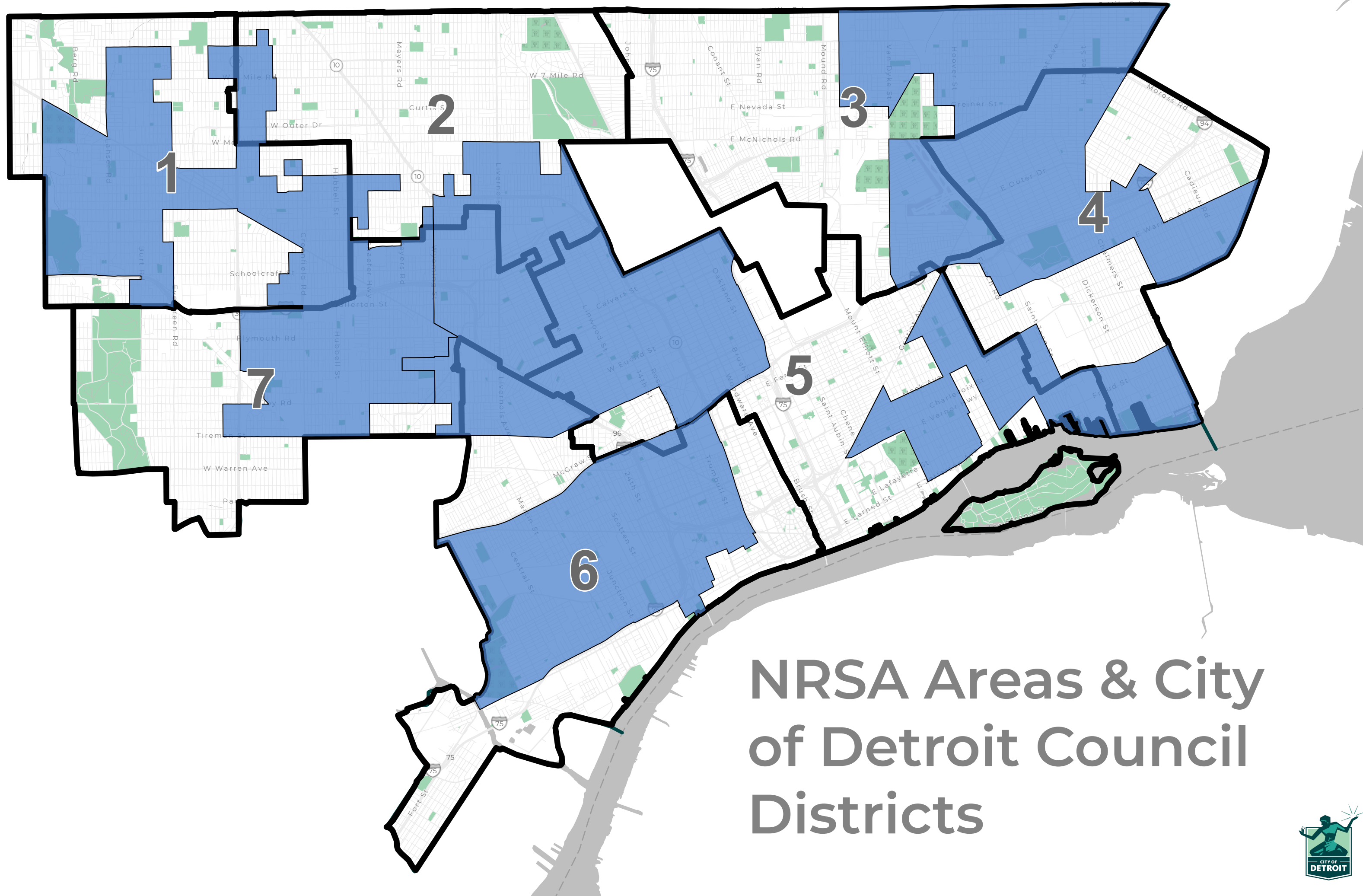
- NRSA_1 (LMI 72%, Residential Area 72%)
- NRSA_2 (LMI 78%, Residential Area 69%)
- NRSA_3 (LMI 78%, Residential Area 78%)
- NRSA_4 (LMI 76%, Residential Area 68%)
- NRSA_5 (LMI 75%, Residential Area 62%)

FY2020 ACS 5-Yr 2011-2015

Percent of LMI

- Up to 70%
- 70 - 100%
- No Data

- SNF Planning Areas
- HRC Service Area
- Council Districts

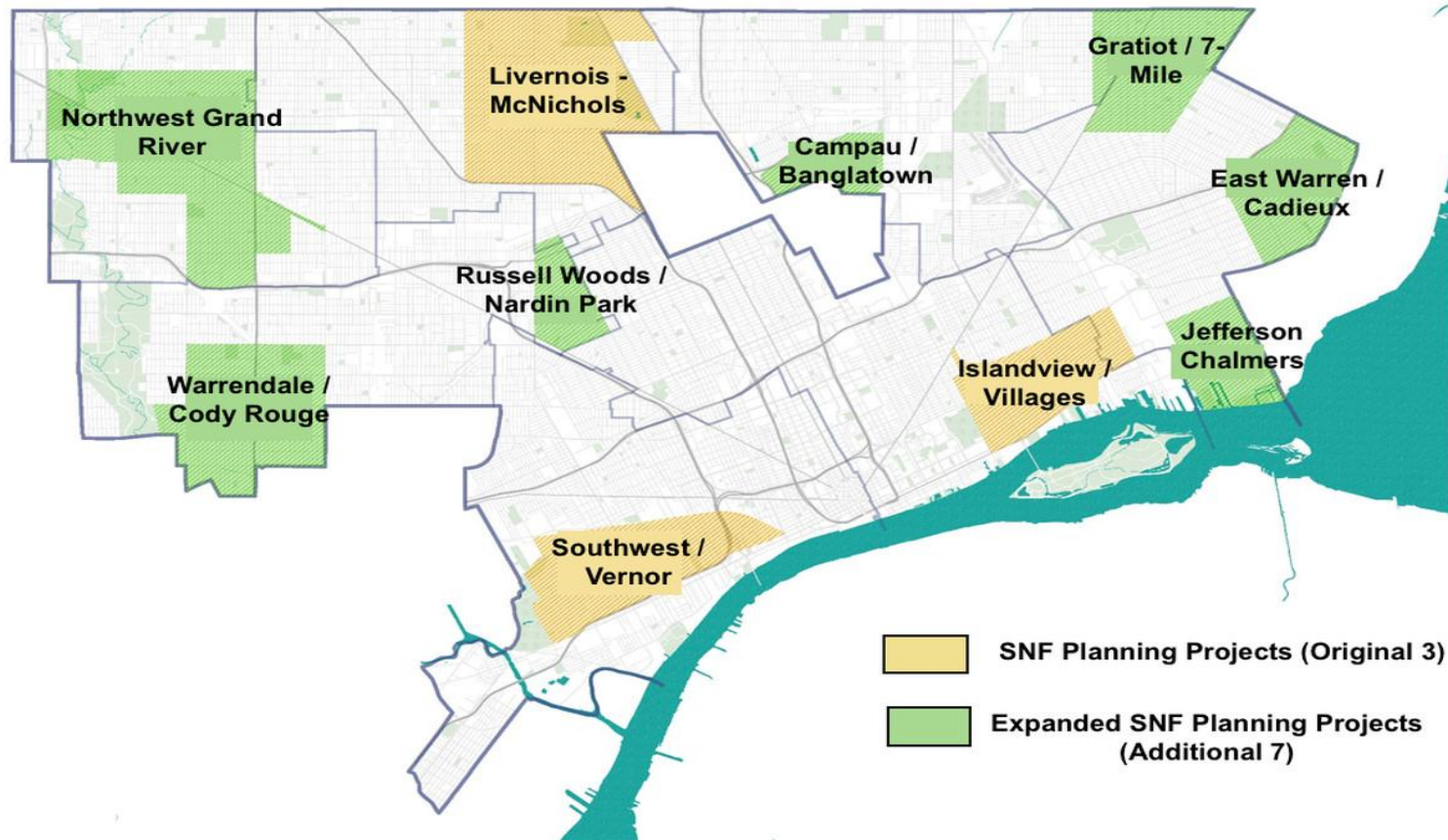


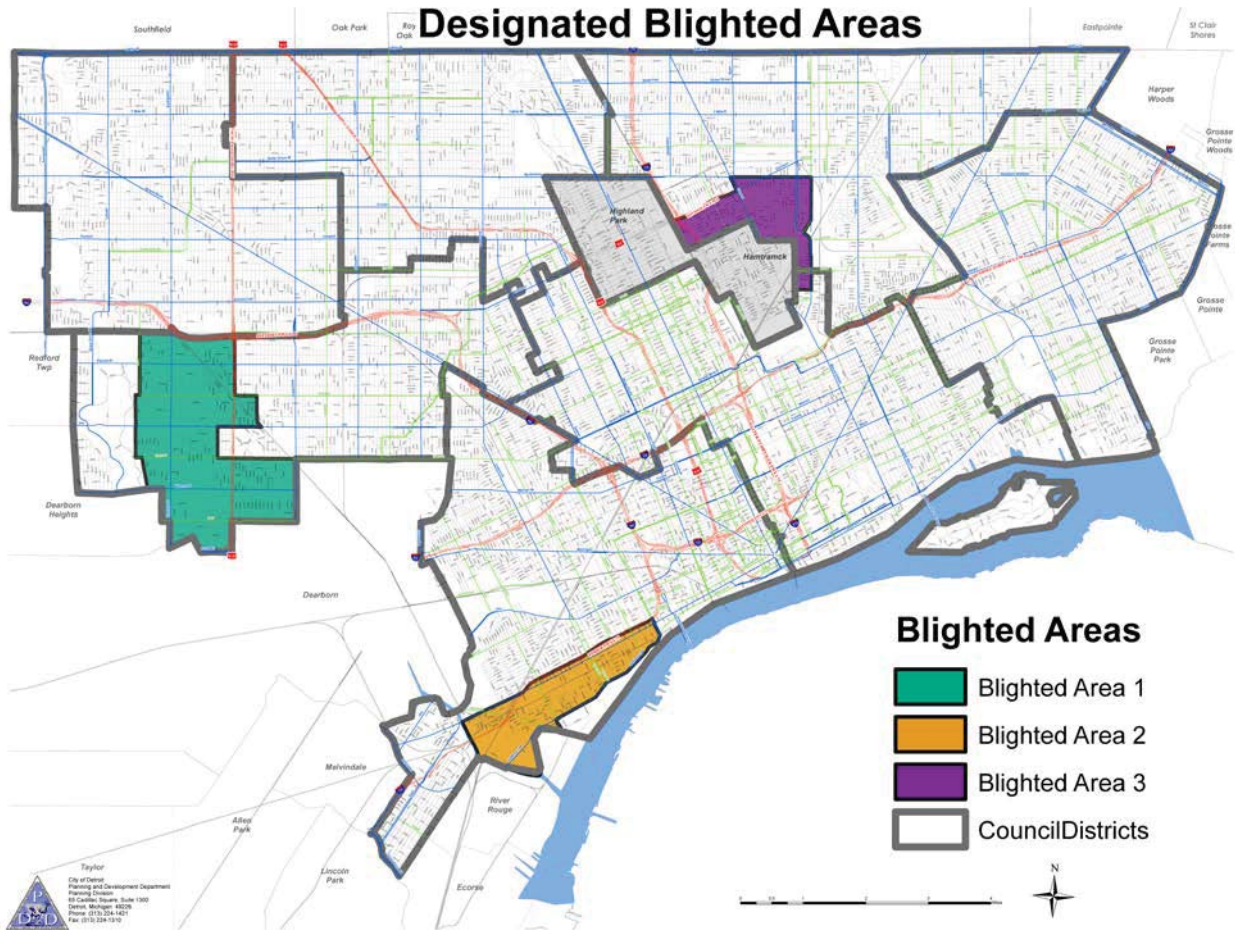
NRSA Areas & City of Detroit Council Districts



City of Detroit – Master Plan of Policies

10 Neighborhood Clusters targeted through the Strategic Neighborhood Fund (SNF)





Designated Blight Areas Map

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

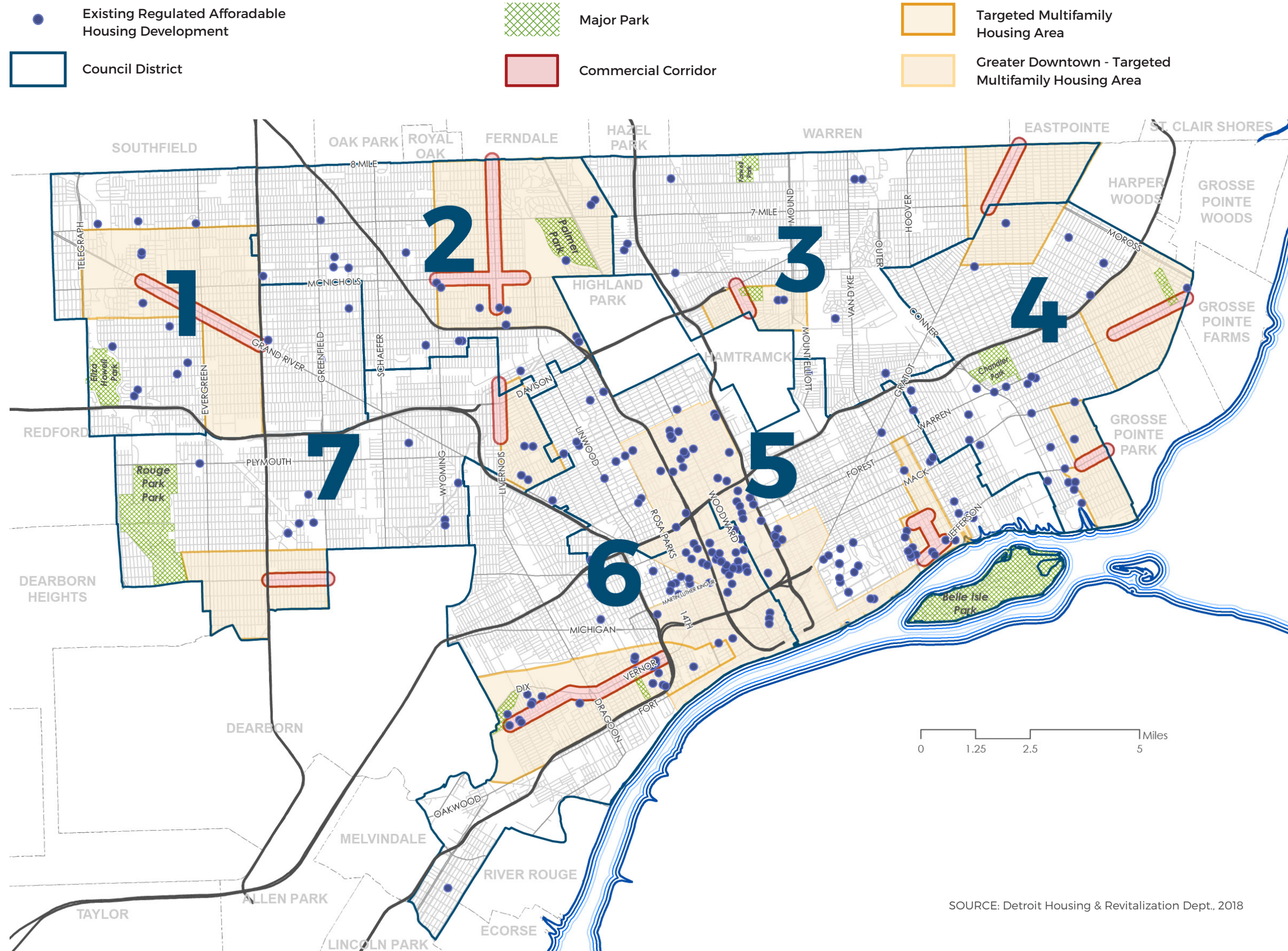
In mid-2017, the City convened and led a task force comprised of community stakeholders to develop a Preservation Action Plan that will guide preservation efforts over the next five years. The creation of this group, known as the Detroit Affordable Housing Preservation Task Force, was modeled on best 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



CENSUS 2010 LOW/MOD MAP

