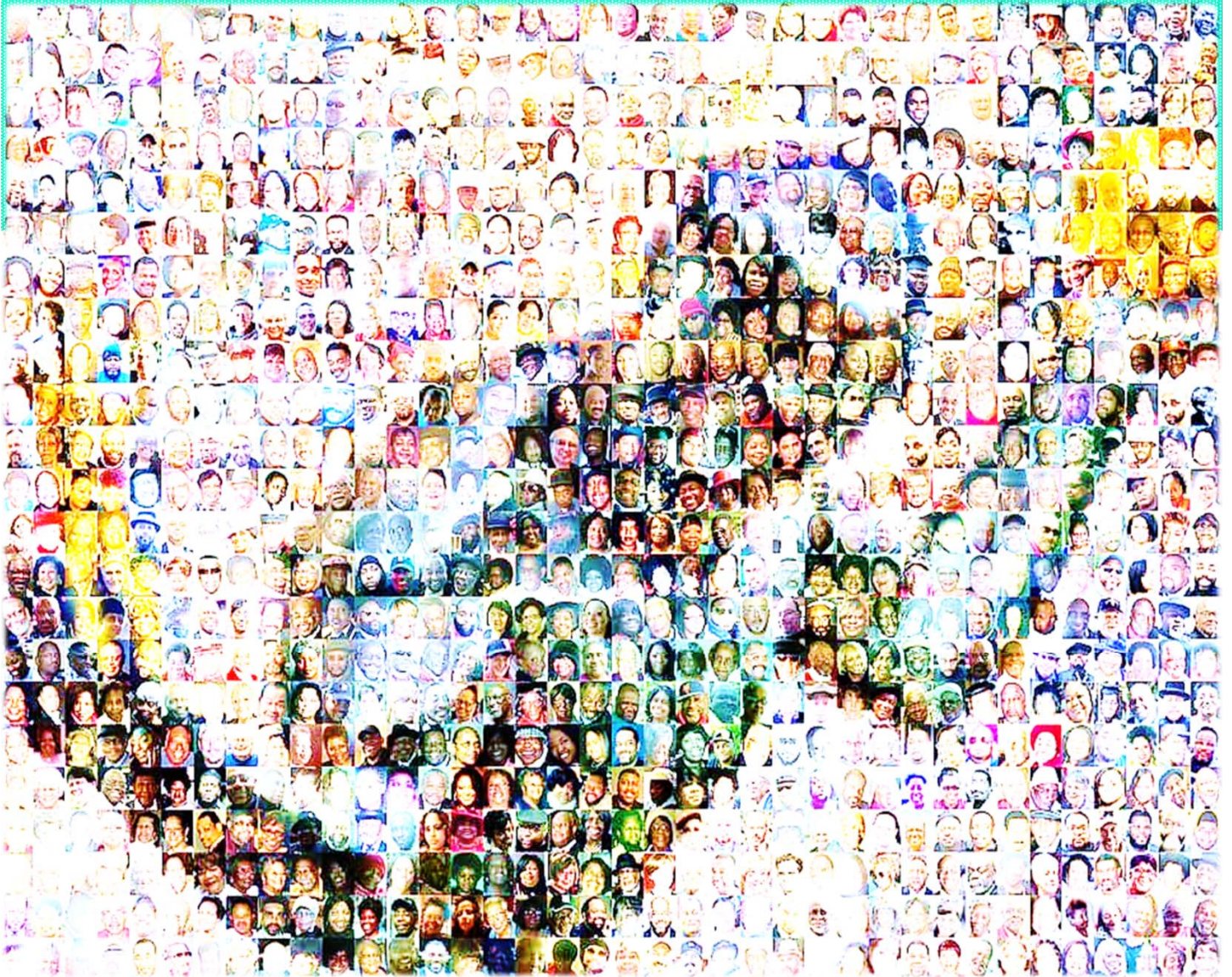


2020-2024
U.S. Housing and Urban Development
Consolidated Plan
&
2020-2021 Annual Action Plan



CITY OF DETROIT

MAYOR, MIKE DUGGAN



CITY OF DETROIT 2020-2024 CONSOLIDATED PLAN & FY 2020-2021 ANNUAL ACTION

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Executive Summary

ES-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 24CFR Part 91. The Con Plan is implemented through the preparation of an Annual Action Plan each of the five years which 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 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, and upon completion, will be submitted to HUD for review and approval.

The City’s FY 2020-2021 (first 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.” Based on an estimate of the funding received for FY 2020-2021, the allocation of available funding for the five-year Con Plan is estimated as follows:

- Community Development Block Grant (CDBG) - \$176,411,795
- HOME Investment Partnership (HOME) - \$36,340,165

- Emergency Solutions Grant (ESG) - \$15,164,350
- Housing Opportunities for Persons with HIV/AIDS (HOPWA) - \$14,515,675

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 August 1, 2020:

- NSP1 - \$ 423,344
- NSP3 - \$ 134,619

The City of Detroit applied for and received a Neighborhood Revitalization Strategy Area (“NRSA”) designation from HUD as an amendment to the 2015-2019 Consolidated Plan. The City intends to reapply to HUD for an extension of the NRSA designation and submit it along with the FY 2020-2024 Con Plan. Per HUD Notice CPD-16-16, page 4, the City may “*submit a request to renew an existing NRSA, with updated required contents and a written statement that the strategy can still be effective if approved; or submit a request for approval of an amended strategy with a new term.*” Based on the most recent American Community Survey data, there have been some adjustments to the NRSA boundaries. As a result, the City will submit an amended 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 providing assistance to 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, the goals for the next five years 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 2018-2019 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 2018-2019 as reported in the CAPER, the City of Detroit's performance was evaluated by staff who noted the following accomplishments and challenges:

- In 2018, activities implemented with CDBG, HOME, ESG and HOPWA funds benefited a total of 93,272 individuals.
- The City of Detroit stayed within the statutory CDBG expenditure limitations for planning and administration at 19.16 percent and public services at 14.93 percent.
- Over 70 percent (75.40%) of the City of Detroit's CDBG funds were expended on activities that benefited low and moderate-income residents (Primary Objective).
- Financed the rehabilitation of 649 housing units over the last year including 170 rental housing and 479 owner-occupied single-family houses which was 280 percent of goal.
- Continued to address lead poisoning issues in housing rehabilitation by abating lead in these units. The City launched its \$9.7M grant from the HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH) in the 48209 zip code that will serve 455 households over five years, and continues to use CDBG funding to leverage HUD OLHCHH Lead Funding to serve another 280 households over three years through its City-Wide program.
- To reduce the number of homeless citizens, the City assisted 266 households with public services and financial assistance to homeowners.
- There were 37 buildings demolished which was 49 percent of goal.
- In partnership with the Detroit Economic Development Growth Corporation (DEGC), the City assisted new or expanding Detroit neighborhood businesses, leveraging over \$27 million in total new neighborhood business investments including nearly \$1 million in our Neighborhood Revitalization Stabilization Areas (NRSA). In all, 916 entrepreneurs have received some form of assistance of which 79 percent are minority owned, 69 percent are women-owned businesses.
- For FY 2018-2019, 263 small businesses were assisted with CDBG funds which exceeded the City's goal (584 percent)
- Under the Grow Detroit's Young Talent (GDYT), Detroit Employment Solutions Corporation (DESC) leveraged over \$3 million and provided over 1,500 youth job placement and training services. The City has invested \$4.5 million on the Summer Youth Jobs training program in partnership with private businesses and nonprofit organizations.
- Through July 2020, the City expended most of its 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, purchase of easements resulting in 13,510 persons served.

- Under CDBG, 5,635 persons received non-homeless public services which was 28.5 percent of the goal.
- 3,558 persons received assistance with public services to prevent and reduce homelessness.
- The Emergency Solutions Grant (ESG) provided 4,740 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 250 households with rental assistance or long-term housing, which exceeded the City's goal (122.6 percent).
- HOPWA provided 38 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.
- Earlier this year, programs were temporarily suspended due to the Coronavirus pandemic. The City of Detroit received over \$30 million in Coronavirus Aid, Relief and Economic Securities (CARES) Act to provide assistance to citizens. Due to the pandemic the City did not meet the CDBG timeliness expenditure, reflecting more than 1.5 times the annual allocation on hand as of May 1, 2020.

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 prior to the development of the plan and after the plan drafted up to the final approval by the City council to maximize public input. The COVID-19 pandemic impacted 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. A total of six (6) workshops were held. Five (5) of the workshops were public hearings (four (4) virtual and one (1) in-person meeting). At those meetings, 157 residents and businesses completed community surveys, and 48 persons/organizations responded to the agency survey. See PR-15.

The surveys were sent out via email, online flyers, and posted on the City's website. The draft FY 2020-2024 Consolidated Plan was published for a 30-day period from 9/16/2020 to 10/16/2020 with printed copies at community locations and on the City's website. The draft FY 2020-2024 NRSA draft application was published for a 15-day period from 9/30/2020 to 10/15/2020 with printed copies at community locations and on the City's website. The public hearings and review and approval of the plan at the Detroit City Council Meeting was held on November 19, 2020 (for discussion) and November 24, 2020 (for

approval) – 86 Participants. Over 1,000 individuals and organizations provided input on the Consolidated Plan.

The City’s Housing and Revitalization Department (“HRD”) consulted with over 44 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:

Community Survey: Citizens and stakeholders asked about how the community survey would be distributed and who could participate.

NRSAs: There were several inquiries about the NRSA and the application process, specifically the boundary areas, how they were determined and how the efforts would help specific communities such as artists and seniors.

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 and if the consolidated plan will include funding for this type of home repair.

Vacant Properties: Community interest around vacant lots, homes and property were high. This included inquires on how to purchase them, how to request they be demolished, how the city plans to utilize vacant lots, who can purchase them and if they could be used for activities such as urban farming.

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 funding included.

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, 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 2015, the City received HUD approval for the designation 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. 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 summarized in the 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 is being requested.

Using the previously designated NRSAs as a starting point, the City used 2015 American Community Survey (ACS) data and other investment areas that overlapped the identified areas that had not previously benefitted from the NRSA strategy.



NRSA Accomplishments from 2015-2019

Improved Housing	Neighborhood Stabilization	Small Business Support	Job Creation	Public Services
<ul style="list-style-type: none"> Total number of houses repaired under the 0% Loan Program were 515 owner occupied units. Of that, 335 units were completed in NRSA's. 139 residents received Senior Emergency Repair program grants - \$3MM in CDBG funds 128 people were served with the Lead Abatement program - over \$2MM in CDBG funds 	<ul style="list-style-type: none"> 9,223 residential demolitions were completed in NRSA's 344 commercial demolitions were completed in NRSA's 	<ul style="list-style-type: none"> 263 businesses were assisted that were located within the NRSA's 321 property owners addressed exterior violations 50 businesses received technical assistance to help advance business ideas 	<ul style="list-style-type: none"> Over 15,000 Detroit youth received employment preparation City Wide 281 adults were placed in permanent jobs and over \$1MM in CDBG funds spent to support job placement 	<ul style="list-style-type: none"> Home repair loan applicants who were denied received CWF services such as financial counseling & credit repair 4,027 youth received summer jobs and over \$5MM in CDBG funds spent

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 partner 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.

Consolidated Plan Public Contact Information

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PR-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 Consolidated 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 listed below in Table 2

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 partnering 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 partner to these 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 which 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 the 2018 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 was 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 which 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 Noon-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 back stage 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>

	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 a review of website and materials. The Department developed the Detroit Sustainability Action Agenda which 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.
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?	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.
50	Agency/Group/Organization	Planning and Development (P&DD)
	Agency/Group/Organization Type	Other government - Local

<p>What section of the Plan was addressed by Consultation?</p>	<p><input checked="" type="checkbox"/> Agency - Managing Flood Prone Areas</p> <p><input checked="" type="checkbox"/> Agency - Management of Public Land or Water Resources</p> <p><input type="checkbox"/></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 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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
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
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(I)).

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 is entering its third 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.

PR-15 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:

- CDBG/NOF 2020 Subrecipient Workshops held on August 21 and September 7, 2019 – 152 Participants
- In-Person Public Hearing Meeting #1 to kick off the 2020-24 Consolidated Plan and the 2020-21 Action Plan process was held October 23, 2019 – nine (9) Participants
- CDBG/NOF and Homeless Public Service Subrecipient orientation meeting was held for non-profits on February 17, 2020 – 52 participants
- A Department of Neighborhood, District #5 Quarterly meeting held to announce the upcoming community surveys and public hearing meetings on February 18, 2020 – 70 Participants
- Two online surveys were created, a community survey for residents, businesses, and property owners and another for agencies. The surveys were sent out via email, online flyers, and posted on the City's website. 157 persons answered the community survey and 48 persons/organizations responded to the agency survey

- The ESG technical assistance virtual training workshop for ESG subrecipients was held on June 19 and June 23, 2020 – 204 participants
- The Consolidated Plan/Annual Action Plan and NRSA Virtual Public Meeting #2 was held on August 25, 2020 – 49 participants
- The Consolidated Plan/Annual Action and NRSA Virtual Public Meeting # 3 was held on September 2, 2020 – 166 participants
- The draft FY 2020-2024 Consolidated Plan was published for a 30-day period from September 16 – October 16, 2020 with printed copies at community district locations and on the City’s website.
- The draft FY 2020-2024 NRSA draft application was published for a 15-day period from September 30 to October 15, 2020 with printed copies at community locations and on the City’s website.
- A Public Hearing and review and approval of the plan at the Detroit City Council Meeting held on November 19, 2020 (for discussion) and November 24, 2020 (for approval) – 86 participants

Over 1,000 individuals and organizations provided input on the Consolidated Plan.

Housing and Community Development Needs Prioritization

Housing and community development needs were identified and 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	NOF Public meeting 02/17/20	Non-profits	The Con Plan and NRSA was presented & questions fielded. 52 participants attended.	See comment section		
2	District # 5 2/18/2020	Residents & community leaders	A meeting was held to announce the survey & public meetings. 70 participants were in attendance	See comment section		
3	Public Meeting #1 10/23/2019	Non-specified – residents, community leaders, non-profits	Presentation on draft Con Plan, Housing Market Analysis, needs assessment, and online survey results as well as priority needs & 2020 NRSAs. 9 participants were in attendance	Covered in comment section		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Virtual Public Meeting #2 and #3 08/25/2020 09/02/2020	Non-specified – residents, community leaders, non-profits	Presentation on draft Consolidated Plan, Housing Market Analysis, needs assessment, and online survey results as well as priority needs & 2020 NRSAs. 215 participants were in attendance	Covered in comment section		
5	NOF orientation workshop meetings 08/21/2019 09/07/2019 06/19/2020 06/23/2020	Non-profits	Covered in comment section 356 participants were in attendance	Covered in comment section		

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)
6	30-day public comment period 09/16-10/16/2020	Non-specified - citywide	Draft FY 2020-2024 Consolidated Plan & FY 2020-2021 Annual Action Plan	Covered in comment section		
7	15-day comment period 09/30-10/15/2020	Non-specified - citywide	Draft FY 2020-2024 NRSA application	Covered in comment section		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
8	Online and Paper Agency and Community Survey	Non-targeted/broad community	<p>The surveys were sent out via email, online flyers, and posted on the City's website.</p> <p>157 persons answered the community survey and</p> <p>48 persons/organizations responded to the agency survey.</p>	Residents and agencies gave input on housing and community development needs with housing opportunities, and improvements to infrastructure marked as the highest priorities.	All comments were accepted.	<p>Community - https://www.surveymonkey.com/r/2020DetComm</p> <p>Agency - https://www.surveymonkey.com/r/2020DetAgency</p>
9	<p>Public Hearing – Detroit City Council Committee (Discussion)</p> <p>11/19/2020</p>	Non-specified - citywide	<p>Draft FY 2020-2024 Consolidated Plan & FY 2020-2021 Annual Action Plan</p> <p>Draft FY 2020-2024 NRSA application</p> <p>42 participants were in attendance</p>			

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
10	Public Hearing #2 City Council for approval 11/24/2020	Non-specified - citywide	Draft FY 2020-2024 Consolidated Plan & FY 2020-2021 Annual Action Plan Draft FY 2020-2024 NRSA application 44 participants were in attendance			

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

This section introduces the key points of the Needs Assessment in the areas of affordable housing, homelessness, special needs housing, public housing, disproportionate housing needs, and non-housing community development. The analysis seeks to understand the specific household characteristics and needs for different household types such as small, large, elderly, and persons with disabilities. Since CDBG and HOME grant program eligibility is based on specific household income classifications, household income is an important aspect of the analysis. Household incomes are classified as follows: extremely low-income -at or below 30 percent of Area Median Income (AMI); very low-income - between 31 and 50 percent of AMI; and moderate-income - between 51 and 80 percent of AMI.

Housing Needs Assessment: City residents experience several types of housing problems: supply and demand and affordability; substandard housing (lacking complete plumbing or kitchen facilities); overcrowding and severely overcrowding; cost burden, and severe cost burden (spending more than 30% or 50% of income on housing costs); and zero or negative income. With a 29 percent decline in Detroit households, and financial barriers to moving, median household income declined by 13 percent. Single person households, the elderly, and persons with disabilities have a need for affordable housing with cost burden one of the most common housing problems for residents. A significant need exists for renter and owner-occupied affordable housing, especially low and extremely low-income households. The low incomes translate directly into housing problems and poverty level are high and widespread.

Disproportionately Greater Need: A disproportionately greater need exists when the members of a racial or ethnic group at a specific income level experience housing problems at a greater rate (10% or more) than the income level. The 2011-2015 CHAS data shows that Asian households experience housing problems and severe housing problems disproportionately at 35 percent. The concentration of housing problems is at lower incomes particularly those below 30 percent of AMI, while the percentage of households with housing problems decreases at higher income levels.

Public Housing: The City has one of the largest public housing authorities, the Detroit Housing Commission (DHC), with a large portfolio of rental housing and housing choice vouchers, along with a waiting list of over 9,000 annually of which 5,546 requesting accessible housing units. The DHC has developed housing with or without partners using low income housing tax credits and is working on the use of the HUD Rental Assistance Demonstration (RAD) Program. The DHC created a comprehensive Capital Improvement Plan which addresses the needs of its properties. DHC has an active tenant strengthening policy that assists

tenants with purchasing homes with their vouchers, a bank loan, and a savings program under the Family Self-sufficiency (FSS) Program.

Homeless Needs Assessment: Detroit has been able to reduce its homelessness rates with a low incidence of unsheltered homeless with about 6 percent of the recorded homeless population going unsheltered, and of those unsheltered homeless, most refuse to engage in accessing resources. A large proportion of the homeless population are single households at 1,306 households (97 percent) of the sheltered and unsheltered homeless are African Americans.

Non-Homeless Special Needs Assessment: The City of Detroit has identified the non-homeless special needs population as: elderly persons, veterans, persons with disabilities, persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, and victims of domestic violence. The City addresses the vast needs of these groups by utilizing CDBG funding to support agencies that provide services that address the needs of the population. The City also coordinates activities with the Local Continuum of Care.

Non-Housing Community Development Needs: Based on public input received and data from needs assessments for public improvements and facilities, the City has the following non-housing community development needs:

- Public Services including services for the elderly, children and youth, homeless prevention, persons with disabilities, mental health, and education.
- Public facilities including neighborhood and community centers, youth centers, mental health facilities, and park improvements.
- Public improvements including sidewalk, streets, and water and sewer improvements.

Due to other priority needs, not enough funding to meet the needs, the City has not budgeted CDBG funding for public infrastructure as a top priority. CDBG funds are projected for public facilities. The city can use its capital improvement plan to attract and leverage funding in the City's low- to moderate-income neighborhood, The City through HRD has been able to develop tools, products, and attract private capital. Most of the data tables in this section are populated with default data from the 2011-2015 American Community Survey (ACS) and the Comprehensive Housing Affordability Strategy (CHAS) datasets. CHAS datasets are developed for HUD by the U.S. Census Bureau based on the ACS. In addition to these data sources, the Needs Assessment is supplemented by current local data to provide greater context as to what is happening in Detroit.

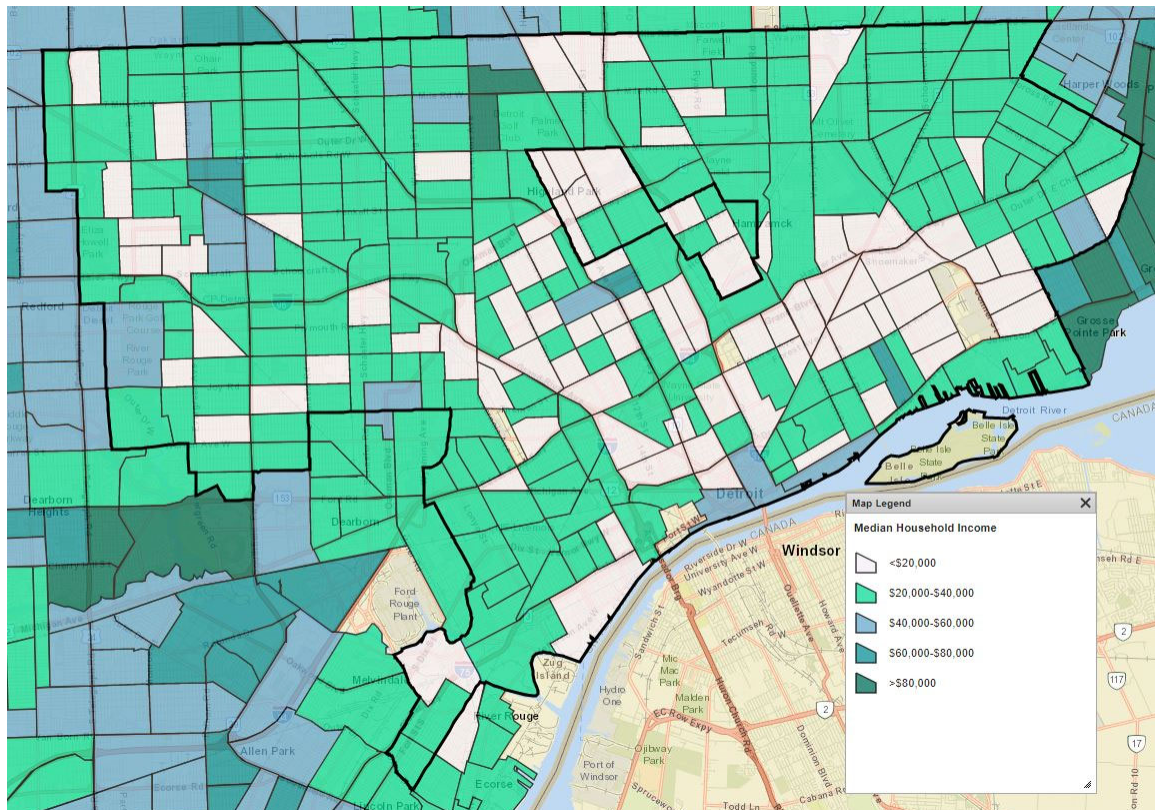
NA-10 Housing Needs Assessment - 24 CFR 91.205 (a, b, c)

Summary of Housing Needs

Based on the data provided by HUD, many demographic groups need housing which is both affordable and available. The number of households in the city declined by 20 percent between 2009 and 2015. The decline in households has many impacts, foremost is increased housing vacancy. Households who leave the city tend to have more financial resources than others who cannot move, therefore the city has experienced an increase in lower-income households and lower median incomes. Between 2009 and 2015 the median household income declined by 13 percent to \$25,764.

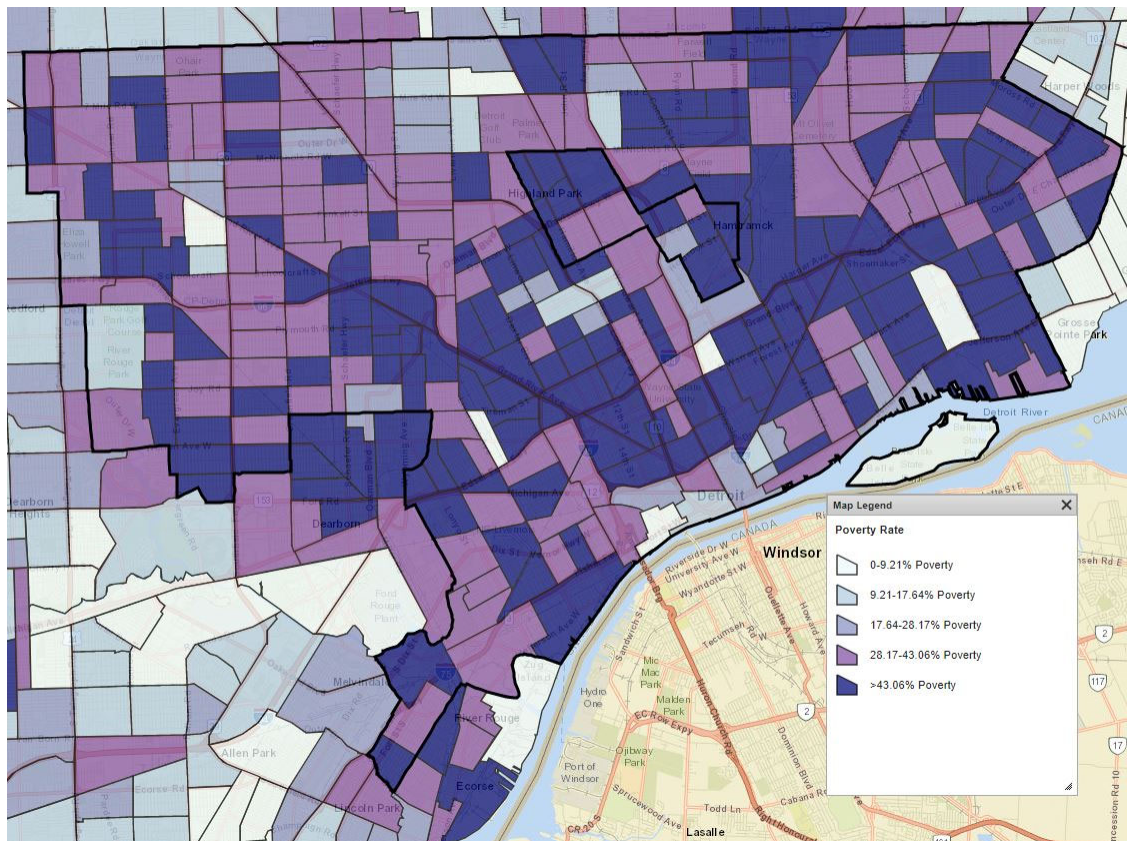
Single person households are a demographic with significant needs. The 2011-2015 American Community Survey 5-Year Estimates indicate there are 51,167 single female households and 47,488 single male households in Detroit. The median income in Detroit for a single female living alone is \$16,900 while the median income for a single male living alone is \$17,284. Another group of households in need of housing assistance are seniors (65-years and older) of which there are 59,843 households. Additionally, seniors tend to live on fixed incomes, have a higher rate of disability, and higher healthcare costs. The map below presents the median household income across the city. What is immediately noticeable is that most census tracts fall below \$40,000 per year, with many below \$20,000 which indicates high levels of poverty.

Map 1: Median Household Income



Poverty in the city is widespread. The map below presents the percentage of households in poverty by census tract. In Detroit, nearly all census tracts have a poverty rate of greater than 28 percent.

Map 2: Poverty Rate



The low incomes of Detroit residents translate directly into housing problems. The main housing problem found in Detroit are households spending more than 30 percent of their income on housing costs which indicates cost burdening. Cost burdened households may be at risk for missed payments, foreclosure, eviction, or inability to provide for other necessities such as food, clothing, or transportation due to the amount of money being spent on housing costs. Cost burdened households account for nearly 45 percent of all households in Detroit, translating into 114,080 households of which 95,885 are Black households. Other problems such as overcrowding and substandard housing while important, collectively affect 9,340 households or around 4 percent of all households.

Extremely low-income renter households experience tremendous hardship. Based on the HUD data there were 36,980 extremely low-income renter households, which accounts for 80 percent of renter households, experiencing severe cost burdening. Similarly, 70 percent of extremely low-income owner households were cost burdened.

Other housing issues identified were substandard housing and overcrowding. Substandard housing affects 2 percent of households in Detroit while overcrowding affects 1 percent of households. Extremely low-income renter households are vulnerable to substandard housing issues, as 2,015 households (69 percent) who live in substandard conditions. Similarly, extremely low-income owner households experience substandard housing conditions at a rate of 55 percent. Overcrowding is not as an acute problem in the city but still tends to affect extremely low-income renter households the greatest. Based on the data, 60 percent of overcrowding in renter housing occurs in housing units occupied by households which are extremely low-income.

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	713,777	690,075	-3%
Households	317,734	255,740	-20%
Median Income	\$29,447.00	\$25,764.00	-13%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Number of Households

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	89,890	45,730	46,895	20,830	52,395
Small Family Households	31,600	16,140	17,290	7,810	22,345
Large Family Households	9,090	5,245	4,475	1,895	4,005
Household contains at least one person 62-74 years of age	13,970	9,490	11,460	5,305	14,360
Household contains at least one person age 75 or older	7,075	7,215	6,795	2,520	4,960
Households with one or more children 6 years old or younger	19,100	7,925	6,270	2,755	4,615

Table 6 - Total Households Table

Data Source: 2011-2015 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	2,015	455	265	200	2,935	855	225	310	170	1,560
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	810	315	230	70	1,425	95	120	130	40	385
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	1,675	710	305	110	2,800	595	800	470	180	2,045
Housing cost burden greater than 50% of income (and none of the above problems)	36,980	6,750	575	60	44,365	13,915	4,225	1,565	265	19,970
Housing cost burden greater than 30% of income (and none of the above problems)	6,200	10,430	6,935	605	24,170	4,745	5,680	5,945	1,820	18,190
Zero/negative Income (and none of the above problems)	8,050	0	0	0	8,050	3,465	0	0	0	3,465

Table 7 – Housing Problems Table

Data 2011-2015 CHAS
 Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	41,475	8,225	1,375	445	51,520	15,460	5,370	2,470	655	23,955
Having none of four housing problems	13,560	16,610	18,940	6,685	55,795	7,880	15,535	24,110	13,050	60,575
Household has negative income, but none of the other housing problems	8,050	0	0	0	8,050	3,465	0	0	0	3,465

Table 8 – Housing Problems 2

Data 2011-2015 CHAS
 Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	18,340	7,135	3,235	28,710	6,360	3,265	2,775	12,400
Large Related	5,335	1,700	424	7,459	2,355	1,160	450	3,965
Elderly	7,225	3,310	1,240	11,775	6,125	4,375	3,075	13,575
Other	15,355	5,780	2,745	23,880	4,855	1,510	1,290	7,655
Total need by income	46,255	17,925	7,644	71,824	19,695	10,310	7,590	37,595

Table 9 – Cost Burden > 30%

Data 2011-2015 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	16,325	2,875	150	19,350	4,790	1,335	500	6,625
Large Related	4,610	475	4	5,089	1,480	355	105	1,940
Elderly	5,320	1,130	100	6,550	4,545	1,990	700	7,235
Other	13,350	2,385	320	16,055	3,850	660	280	4,790
Total need by income	39,605	6,865	574	47,044	14,665	4,340	1,585	20,590

Table 10 – Cost Burden > 50%

Data 2011-2015 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	1,810	595	205	130	2,740	585	715	295	165	1,760
Multiple, unrelated family households	575	370	230	50	1,225	100	215	305	55	675
Other, non-family households	105	50	110	0	265	4	0	0	0	4
Total need by income	2,490	1,015	545	180	4,230	689	930	600	220	2,439

Table 11 – Crowding Information – 1/2

Data 2011-2015 CHAS
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present								

Table 12 – Crowding Information – 2/2

Describe the number and type of single person households in need of housing assistance.

Generally, single households on fixed income are the most likely to live in substandard housing due to their inability to pay the average rent or their inability to maintain their homes. These individuals need housing assistance and are at-risk of becoming homeless if an unexpected event affects their financial situation.

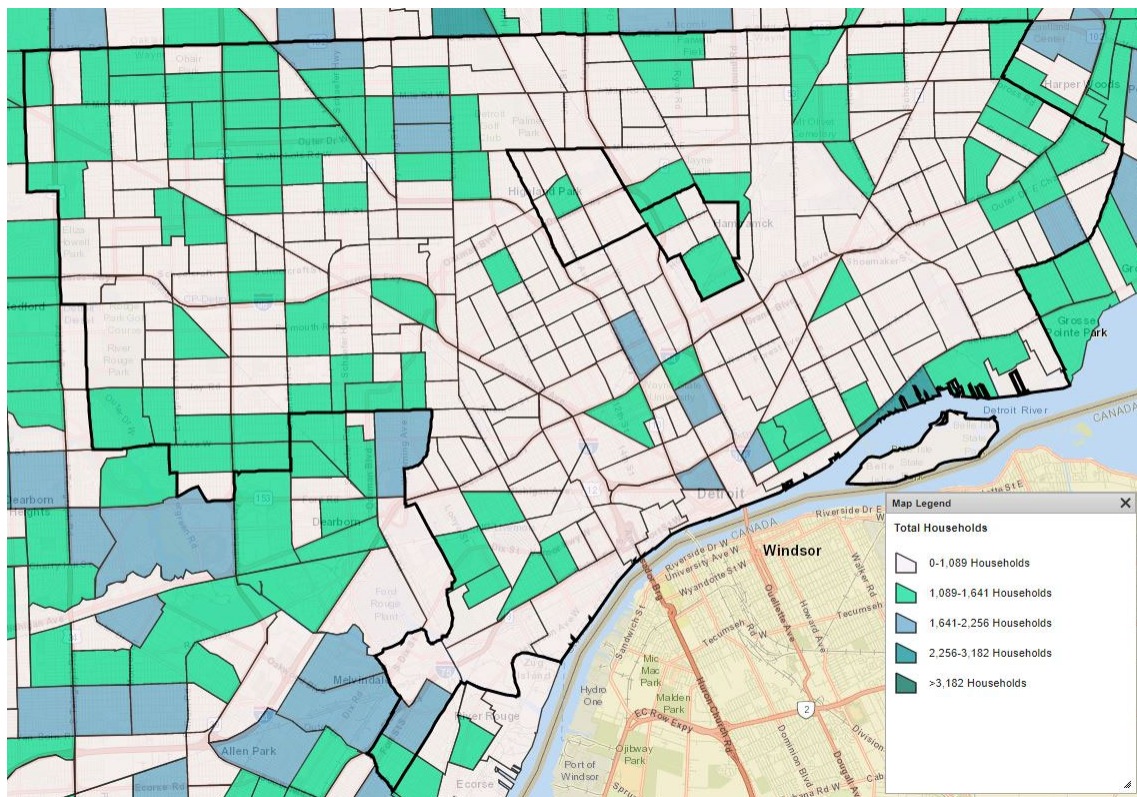
The 2011-2015 American Community Survey 5-Year Estimates indicate there are 51,167 single female households and 47,488 single male households in Detroit. The median income in Detroit for a single female living alone is \$16,900 while the median income for a single male living alone is \$17,284. Both demographic groups have very low incomes which also contribute to housing problems like severe cost burdening because at such low incomes housing choices and options become limited. Using the metric of housing costs not exceeding 30 percent of income, the rents which would be affordable to single females and males would be \$432 and \$532 a month, respectively. According HUD’s Fair Market rent data, the

average monthly rent for a one-bedroom unit in Detroit is \$753 (per HUD's FY2019 Fair Market Rent Documentation System). When adding the cost of utilities, the potential for housing cost burden remains high for single person households who are at or below the median income.

Another group of households in need of housing assistance are seniors (65-years and older). According to data provided by the ACS, there are 59,843 senior households in Detroit. While not all senior households are single person households, there is a risk that these households may eventually become single person households. Additionally, seniors tend to live on fixed incomes and have higher healthcare costs which limit the amount of money they could potentially spend on housing. The median income of a senior household in Detroit is \$29,741 which translates to an affordable rent of \$676 per month. Again, housing choices are limited at this level of income.

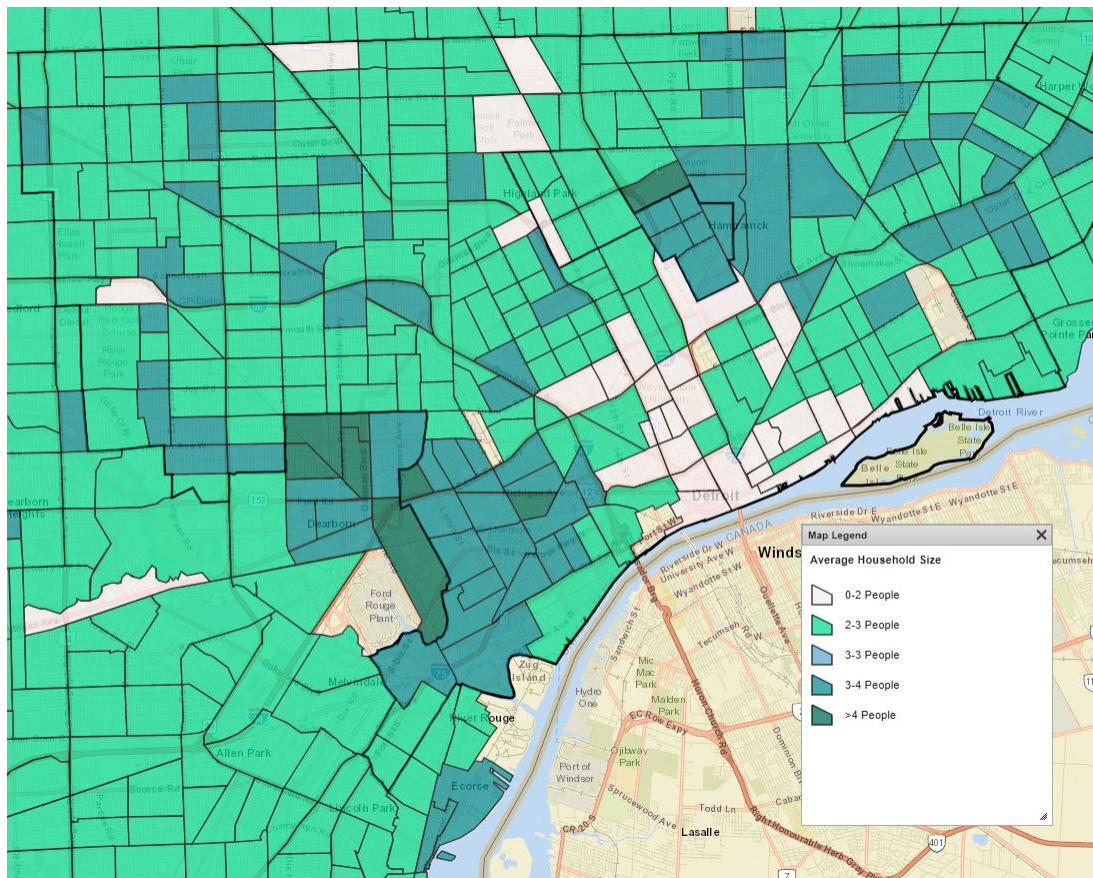
The below map presents household concentrations across the city. Interestingly, greater concentrations of households are found on the periphery of the city. The central part of the city lacks residential density because it is primarily commercial and has also been a victim of a decades long decline in households. A few census tracts in Midtown have higher concentrations of households, however these can be attributed to new apartment and condominium developments being built over the last decade. Aside from these dense developments, the housing stock in Detroit tends to be mostly single-family homes.

Map 3: Total Households



Outside of Downtown and Midtown where the average household size is between one and two persons, much of the city is composed of 2-3 person households. The northeast and southwest portions of the city have a higher than average household size, ranging between 3-4 person households. The map below illustrates the distribution of these households.

Map 4: Average Household Size



Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault, and stalking.

Federal laws define a person with a disability as “Any person who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such impairment; or is regarded as having such an impairment.” The Census classifies disabilities in the following categories:

- those with a hearing or vision impairment
- those with an ambulatory limitation
- those with a cognitive limitation
- those in a self-care or independent living situation

The need for home accessibility and other services for people with disabilities in Detroit is essential because a significant portion of the city's population have disabilities. Based on disability data from the ACS 2011-2015 for Detroit:

- 20 percent or 135,689 individuals have a disability.
- 8 percent or 10,087 children between the ages of 5 and 17 years old have a disability.
- 26 percent or 69,473 individuals between 18 and 34 years old have a disability.
- 46 percent or 38,499 individuals over the age of 65 have a disability.

Looking further at the disability household data which was obtained via HUD CHAS 2011-2015, about 94,610 households (37 percent) in Detroit have a household member who qualifies as having a disability based on the Census definition. Approximately 25 percent of households have at least one resident living with ambulatory limitations; of renter households about 24 percent have a member with an ambulatory limitation. Recognizing the housing and service needs these populations require is critically important. Disabled residents often rely on long-term care and wrap-around services. There may also be an unmet need for long-term housing facilities to assist residents with disabilities.

Physical and mental health disabilities can make it difficult to earn enough to afford adequate housing. While those with disabilities can qualify for Supplemental Security Insurance (SSI) and Social Security Disability Insurance (SSDI), these programs alone may not prevent the disabled from experiencing homelessness.

What are the most common housing problems?

Many Detroit households are spending more than 30 percent of their income on housing costs. HUD classifies households spending more than 30 percent of their income on housing costs as "cost burdened". Households spending more than 50 percent of their income on housing costs are considered "severely cost burdened". Cost burdened households may be at risk for missed payments, foreclosure, eviction, or inability to provide for other necessities such as food, clothing, or transportation due to the amount of money being spent on housing costs. Cost burdened households account for nearly 45 percent of all households in Detroit, translating into 114,080 households of which 95,885 are Black households.

Vacant housing units are another major housing problem in Detroit. The number of households in Detroit decreased by 20 percent between 2009 and 2015, in part due to the Great Recession and the subsequent housing foreclosure crisis. As households left the city, the inventory of vacant housing units began to increase. Presently, there are about 109,788 vacant housing units in the city, which accounts for 30 percent of the entire housing stock. Detroit has enough housing units to serve its residents, but a problem lies in not having enough decent, safe, and affordable housing for residents. Many of the vacant housing units are in disrepair or in locations which lack amenities which ultimately decrease their marketability and value.

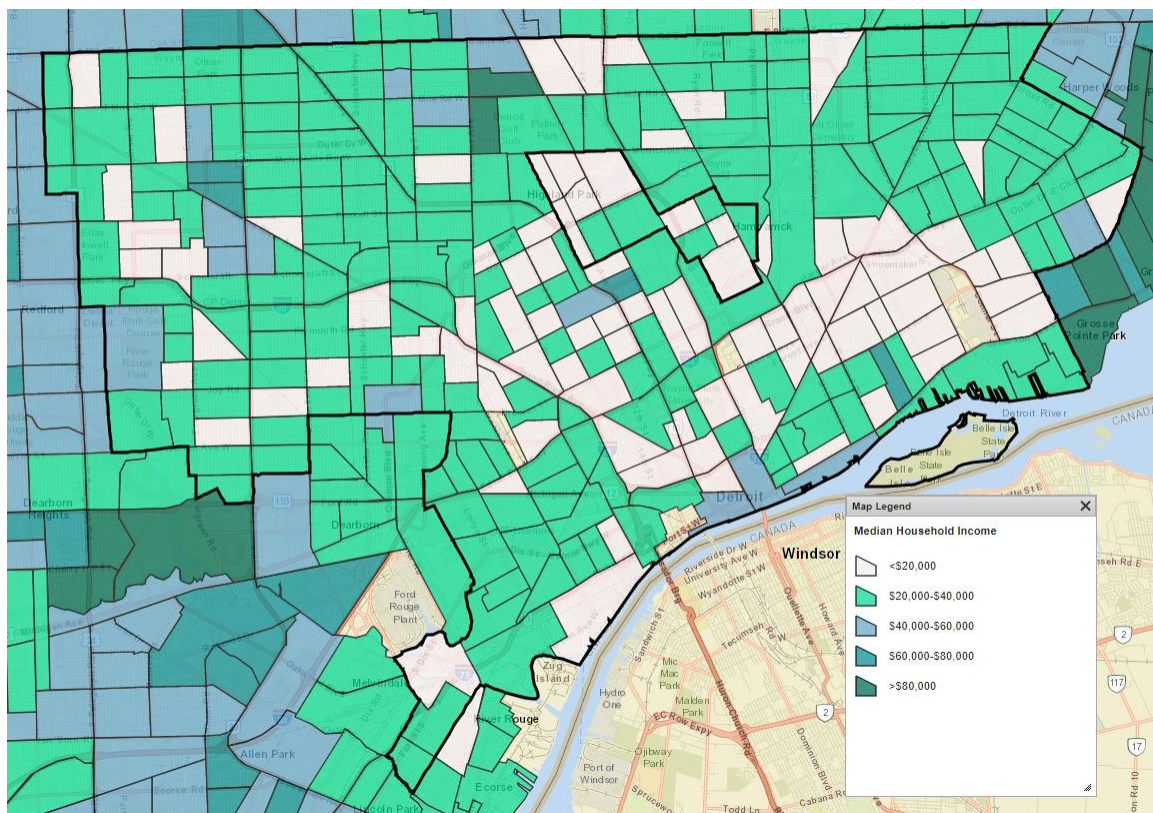
Blight decreases home values, and neighborhoods with a considerable amount of blight do not receive private investment. As blight permeates a neighborhood, the decrease in home values also impacts neighborhood wealth for existing homeowners. Those looking to purchase homes in the neighborhood may be unable to secure loans from lending institutions because underlying asset values are decreasing. In Detroit, the housing stock tends to be older which can increase the chances homes need maintenance

and repairs. With median household incomes so low in Detroit, there may be challenges for existing homeowners to afford necessary home repairs.

Are any populations/household types more affected than others by these problems?

Incomes influence where households can afford to live and the type of housing available. Low incomes tend to limit households to certain neighborhoods that may have an older housing stock with more issues. Of the major racial groups found in Detroit, Black/African American households had the lowest median income at \$25,119 per year. White households had a median income of \$29,181, while Hispanic/Latino households earned \$29,741. Across all racial groups, incomes are low especially when compared to the state median of \$49,576. The map below presents the distribution of income across the city, with the lowest income population being shown clustered in the center of the city.

Map 5: Median Household Income



Male and Female head of households with or without children often struggle to earn enough to support themselves and their family, even though they are working and earning an income. These households could be described as the “working poor” where they earn incomes but may rely on supplemental help and services such as food banks to remain a step ahead of poverty. The federal poverty line for a three-person household is \$21,330. Female single parent households in Detroit comprise 51 percent of all family households and have a median income of \$21,410. Male single parent households account for about 12

percent of all family households and have a median income of \$25,908. Married-couple family households account for the remaining 37 percent of families and have a median income of \$50,522.

Individuals living on a fixed income mostly provided by Social Security (SSI), such as seniors and individuals with disabilities/mental illness, are more affected than others by housing cost burden problems. In some circumstances it can be more challenging for individuals with disabilities to find employment, thus limiting their ability to earn a living wage. Affordable housing options for individuals with disabilities are critically important as there currently is limited choice.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Some of the causes of homelessness include eviction; doubled-up or severely overcrowded housing; domestic violence; job loss; and hazardous housing conditions. Aside from these, one of the primary causes of homelessness, particularly among families, is the general lack of affordable housing. The lack of affordable housing can be compounded by structural economic difficulties which constrain a household's ability to secure housing. There is a general need for economic improvement which can help make jobs accessible, provide technical training to individuals in need, and teach the soft skills necessary to secure and maintain employment.

The following is a list (not exhaustive) of needs of low-income households who have experienced homelessness, or are currently in supportive housing:

- Need for affordable housing.
- Help navigating public housing and voucher program.
- Need for connections to employment and job training.
- Need for aftercare services for families that have been stabilized through shelter or supportive housing resources, including Rapid Rehousing.
- Need for greater collaboration and coordination with other systems serving at-risk households, including systems that deal with immigration, mental health, substance abuse, development disabilities, foster care, corrections, and healthcare system.
- Need of funding for non-housing-based services-only programs (e.g. case management, transportation, day care, and employment programs).

Permanent Supportive Housing (PSH) is an effective intervention for chronically homeless individuals and families. PSH provides a permanent rental subsidy and wrap around services for persons who have significant barriers to housing. The Detroit Continuum of Care (CoC) dedicates funds and resources to address chronically homeless individuals and families by specifically targeting a portion of the community's CoC funded PSH resources to those who are chronically homeless. The funds are used to support homeless individuals in obtaining (among other things), housing, drug treatment, counseling, and job training.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

Housing types for at-risk populations in Detroit include:

- Emergency Shelter
 - There are many emergency shelter providers in the city and some of these shelters are specifically targeted to youth, veterans, or victims of domestic violence.
- Warming Centers
 - During the winter months, seasonal emergency shelters are opened to provide additional shelter space for persons during the cold weather months.
- Rapid Re-housing (RRH)
 - RRH provides short to medium term rental assistance and services for individuals, families, and veterans to quickly move from a homeless situation back into housing. The Detroit CoC provides grant funding to organizations providing RRH.

The methodology to determine at-risk population involves determining the number of homeless persons/households and investigating their housing needs. The Detroit Continuum of Care actively monitors the homeless population and works with service providers to provide housing assistance.

Specify housing characteristics that have been linked with instability and an increased risk of homelessness

The primary characteristics linked with housing instability are a lack of or under employment; previous evictions; history of domestic violence, mental illness, and drug use; and criminal convictions. While this is not a comprehensive list of characteristics linked with housing instability and increased risk of homelessness, these characteristics drive local policies and efforts to increase the interactions within and among several social service systems. Particularly vulnerable populations which are at risk for homelessness including:

- Youth aging out of foster care.
- Women escaping domestic violence.
- Persons exiting a health care institution.
- Persons exiting a mental health care institution.
- Persons exiting a prison.

The city has enacted discharge policies which have helped transition the above-mentioned populations out of the system and into the general population. The strategy and approach try to mitigate the risks of individuals becoming homeless.

Discussion

Homelessness results from a complex set of circumstances that require people to choose between food, shelter, and other basic needs. Efforts on the part of the City and its partners are needed to ensure individuals can obtain employment which pays a living wage and afford housing which meets their basic needs.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need.

Introduction

This section focuses on identifying any housing problems occurring at a disproportionately greater rate for racial or ethnic households within extremely low (0-30% AMI), very low (30-50% AMI), low (50-80% AMI), and middle (80-100% AMI) income levels. For extremely low-income households, 76 percent had one or more housing problems, however there was no individual racial or ethnic category which had a disproportionate need when compared to the jurisdiction. The largest household group affected was Black/African Americans which had 57,015 households categorized with one or more housing problems and accounted for about 76 percent of Black/African American households below 30% of AMI.

For very low-income households, 65 percent had one or more housing problems, but no individual racial or ethnic group had a disproportionate need when compared to the jurisdiction. Similarly, for low-income households, 36 percent had one or more housing problems, but no individual racial or ethnic group had a disproportionate need when compared to the jurisdiction. For middle-income households, 17 percent had one or more housing problems and of those, Asian households were identified as having a disproportionate need when compared to the jurisdiction with 35 percent of Asian households experiencing housing problems.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	67,880	10,490	11,515
White	5,690	1,295	1,270
Black / African American	57,015	8,275	9,550
Asian	565	50	175
American Indian, Alaska Native	285	70	60
Pacific Islander	0	0	0
Hispanic	3,290	550	435

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data 2011-2015 CHAS

Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	29,705	16,025	0
White	2,850	1,820	0
Black / African American	24,260	12,460	0
Asian	330	160	0
American Indian, Alaska Native	70	40	0
Pacific Islander	0	0	0
Hispanic	1,755	1,260	0

Table 14- Disproportionally Greater Need 30 - 50% AMI

Data 2011-2015 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	16,725	30,165	0
White	1,320	3,325	0
Black / African American	14,125	23,920	0
Asian	160	280	0
American Indian, Alaska Native	34	75	0
Pacific Islander	0	20	0
Hispanic	840	2,115	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data 2011-2015 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,525	17,310	0
White	295	2,025	0
Black / African American	2,915	13,990	0
Asian	35	65	0
American Indian, Alaska Native	4	70	0
Pacific Islander	0	0	0
Hispanic	210	815	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data 2011-2015 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

The CHAS data provided by HUD shows that in aggregate across the City of Detroit about 117,835 households, which accounts for 58 percent of all households, have one or more of the four housing problems defined by HUD. The concentration of housing problems tends to intensify at lower incomes particularly those with incomes below 30 percent of AMI, while the percentage of households with housing problems decreases at the upper end of the income spectrum.

In Detroit, for households between 0-30% of AMI about 76 percent experience one or more housing problems. For households at between 30-50% of AMI and 50- 80% of AMI, 65 percent and 36 percent respectively experience one or more housing problems. While for households at 80% to 100% of AMI, 17 percent experience one or more housing problems. Within each of the income cohorts, differences are experienced by the various racial and ethnic groups. The information below presents an analysis and discussion of the income and racial groups experiencing a disproportionately greater need based on the IDIS HUD tables.

- Table 13: Extremely Low-Income (0% - 30% of AMI)
 - For the jurisdiction, 76 percent of the households had one or more housing problems.
 - No racial or ethnic category had a disproportionate need when compared to the jurisdiction.
 - The largest household group was Black/African Americans which had 57,015 households categorized with one or more housing problem and accounted for about 76 percent of Black/African American households below 30% of AMI.

- Of the racial and ethnic groups which had a greater percentage of housing problems than the jurisdiction, there was difference of 1 percentage point between that group (Black/African American) and the jurisdiction.
- Table 14: Very Low-Income (30% -50% of AMI)
 - For the jurisdiction, 65 percent of the households had one or more housing problems.
 - No racial or ethnic category had a disproportionate need when compared to the jurisdiction.
 - The largest household group was Black/African Americans which had 24,260 households categorized with one or more housing problem and accounted for about 66 percent of Black/African American households between 30% and 50% of AMI.
 - Of the racial and ethnic groups which had a greater percentage of housing problems than the jurisdiction, there was difference of 2 percentage point between that group (Asian) and the jurisdiction. In total, there were 330 Asian households which had one or more of the identified housing problems.
- Table 15: Low Income (50% -80% of AMI)
 - For the jurisdiction, 36 percent of the households had one or more housing problems.
 - No racial or ethnic category had a disproportionate need when compared to the jurisdiction.
 - The largest household group was Black/African Americans which had 14,125 households categorized with one or more housing problem and accounted for about 37 percent of Black/African American households 50% and 80% of AMI.
 - Of the racial and ethnic groups which had a greater percentage of housing problems than the jurisdiction, there was difference of 1 percentage point between that group (Black/African American and Asians) and the jurisdiction. In total, there were 160 Asian households which had one or more of the identified housing problems.
- Table 16: Middle-Income (80% - 100% of AMI)
 - For the jurisdiction, 17 percent or 3,525 households had one or more housing problems.
 - Asian households were identified as having a disproportionate need when compared to the jurisdiction with 35 percent of Asian households experiencing housing problems.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205

(b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need.

Introduction

This section focuses on identifying households which have severe housing problems that result in a disproportionately greater need. For extremely low-income households, 63 percent had severe housing problems, however there was no individual racial or ethnic category which had a disproportionate need when compared to the jurisdiction. For very low-income households, 30 percent have severe housing problems with Asian and American Indian racial groups experiencing disproportionate need. For low-income households, 8 percent had severe housing problems, but no individual racial or ethnic group had a disproportionate need when compared to the jurisdiction. For middle-income households, only 5 percent had severe housing problems, with Asian households being identified as having a disproportionate need when compared to the jurisdiction. Approximately 25 percent of Asian households experienced severe housing problems.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	56,935	21,440	11,515
White	4,490	2,500	1,270
Black / African American	48,165	17,130	9,550
Asian	485	125	175
American Indian, Alaska Native	220	135	60
Pacific Islander	0	0	0
Hispanic	2,655	1,180	435

Table 17 – Severe Housing Problems 0 - 30% AMI

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	13,595	32,145	0
White	1,340	3,330	0
Black / African American	11,105	25,615	0
Asian	225	265	0
American Indian, Alaska Native	45	65	0
Pacific Islander	0	0	0
Hispanic	730	2,285	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,845	43,050	0
White	370	4,270	0
Black / African American	2,910	35,135	0
Asian	45	390	0
American Indian, Alaska Native	4	105	0
Pacific Islander	0	20	0
Hispanic	350	2,600	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,100	19,735	0
White	95	2,225	0
Black / African American	835	16,070	0
Asian	20	80	0
American Indian, Alaska Native	4	70	0
Pacific Islander	0	0	0
Hispanic	135	890	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

The CHAS data provided by HUD shows that in aggregate across the City of Detroit about 75,475 households, which accounts for 37 percent of all households, have severe housing problems as defined by HUD. The concentration of housing problems tends to intensify at lower incomes particularly those with incomes below 30 percent of AMI, while the percentage of households with housing problems decreases at the upper end of the income spectrum.

In Detroit, for households between 0-30% of AMI about 63 percent experience severe housing problems. For households at between 30-50% of AMI and 50- 80% of AMI, 30 percent and 8 percent respectively experience severe housing problems. While for households between 80% to 100% of AMI, 5 percent experienced severe problems. The information below presents an analysis and discussion of the income and racial groups experiencing a disproportionately greater need based on the IDIS HUD tables.

- Table 17: Extremely Low-Income (0% - 30% of AMI)
 - For the jurisdiction, 63 percent of the households had severe housing problems.
 - No racial or ethnic category had a disproportionate need when compared to the jurisdiction.
 - The largest household group was Black/African Americans which had 48,165 households categorized with severe housing problems and accounted for about 64 percent of Black/African American households below 30% of AMI.
 - Of the racial and ethnic groups which had a greater percentage of housing problems than the jurisdiction, there was difference of 1 percentage point between that group (Black/African American) and the jurisdiction.

- Table 18: Very Low-Income (30% -50% of AMI)
 - For the jurisdiction, 30 percent of the households had severe housing problems.
 - Asian and American Indian racial groups had a disproportionate need when compared to the jurisdiction. About 46 percent of Asian and 41 percent of American Indian households experienced severe housing problems.
 - The largest household group was Black/African Americans which had 11,105 households with severe housing problems and accounted for about 30 percent of Black/African American households between 30% and 50% of AMI.

- Table 19: Low Income (50% -80% of AMI)
 - For the jurisdiction, 8 percent of the households had severe housing problems.
 - No racial or ethnic category had a disproportionate need when compared to the jurisdiction.
 - The largest household group was Black/African Americans which had 2,910 households categorized with severe housing problems and accounted for about 8 percent of Black/African American households between 50% and 80% of AMI.
 - Of the racial and ethnic groups which had a greater percentage of housing problems than the jurisdiction, there was difference of 4 percentage point between that group (Hispanic) and the jurisdiction. In total, there were 350 Hispanic households which had severe housing problems.

- Table 20: Middle-Income (80% - 100% of AMI)
 - For the jurisdiction, 5 percent or 1,100 households had a severe housing problem.
 - Asian households were identified as having a disproportionate need when compared to the jurisdiction with 25 percent of Asian households experiencing severe housing problems.
 - While not experiencing disproportionate need, about 13 percent of Hispanic households are experiencing severe housing problems.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need.

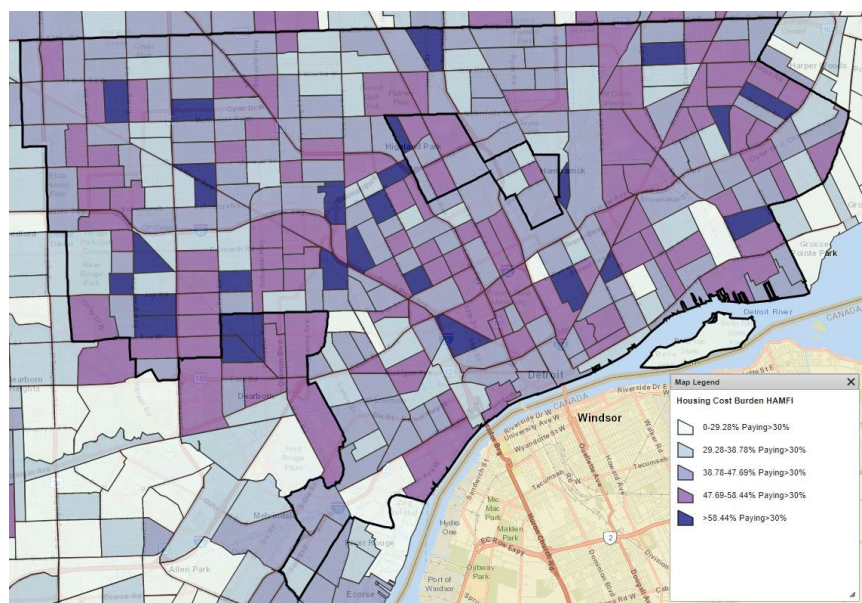
Introduction:

This section focuses on identifying households in greater need because of being housing cost burdened. The analysis looks at households without cost burdens (less than or equal to 30 percent), with cost burdens of (30-50 percent), and with severe cost burdens (more than 50 percent). While the cost burdening rate is high for Detroit households at 18 percent, no racial or ethnic groups have a disproportionate greater need. Similarly, 27 percent of households are severely cost burdened, but no racial or ethnic group experiences a disproportionate greater need.

Housing cost burdened is defined as spending 30 percent or more of household income on housing expenses. Severely cost burdened is defined as spending 50 percent or more of household income on housing. Based on these definitions, cost burdening is a serious problem for both owner and renter households in Detroit. For example, table 20 below shows there are 45,950 households (18 percent) which spend between 30 percent and 50 percent of their income on housing, while 68,130 households (27 percent) spend greater than 50 percent of their income on housing. The discussion in this section describes the racial and ethnic groups which experience a disproportionate concentration of cost burdening than the jurisdiction as a whole.

The map below presents cost burdened households by HUD Area Median Family Income (HAMFI) across Detroit. There is no clear pattern of cost burdening, rather cost burdened households exist across nearly all census tracts. Out of all the census tracts in the city, only six have fewer than 30 percent of households as being cost burdened. HAMFI is a similar term used for Area Median Income (AMI).

Map 6: Housing Cost Burden



Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	129,260	45,950	68,130	12,405
White	16,280	4,325	5,535	1,320
Black / African American	101,600	37,830	58,055	10,285
Asian	1,255	475	530	180
American Indian, Alaska Native	475	135	220	89
Pacific Islander	20	0	0	0
Hispanic	7,625	2,565	2,790	485

Table 21 – Greater Need: Housing Cost Burdens AMI

Data 2011-2015 CHAS
Source:

Discussion:

A disproportionately greater need exists when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the jurisdiction as a whole. Table 20 above presents the number of households without cost burdens (less than or equal to 30 percent), with cost burdens of (30-50 percent), with severe cost burdens (more than 50 percent), and households for which cost burden was not computed due to negative incomes. The information below presents an analysis and discussion of cost burdening issues as they relate to race.

- Cost burden of between 30 to 50 percent of income
 - In Detroit, 45,950 households which accounts for 18 percent of all households are cost burdened.
 - The largest household group was Black/African Americans which had 37,830 households categorized as cost burdened and accounted for about 18 percent of Black/African American households.
 - There were 475 Asian households considered cost burdened in Detroit which accounts for about 19 percent of all Asian households. There is a nearly 2 percent differential cost burdened Asian households and the jurisdiction.
 - Based on the HUD cost burden data, no racial or ethnic groups experienced a disproportionate greater need.
- Cost burden greater than 50% of income
 - In Detroit, 68,130 households which accounts for 27 percent of all households are severely cost burdened.
 - The largest household group was Black/African Americans which had 58,055 households categorized as severely cost burdened and accounted for about 28 percent of Black/African American households.
 - There were 530 Asian households considered severely cost burdened in Detroit which accounts for about 22 percent of all Asian households.
 - Based on the HUD cost burden data, no racial or ethnic groups experienced a disproportionate greater need.

The high rates of cost burdening across the city, particularly severe cost burdening, indicates that the current housing price points are not meeting the needs of Detroit households. Issues around employment, education, transportation access, and neighborhood investment are all contributing factors which impact incomes and the ability to afford housing in the city.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Based on the income by race data provided by the ACS 2011-2015, the racial and ethnic categories which have the greatest need are Black/African American and American Indian and Alaska Natives. When compared to the majority White population which has a median household income of \$29,181, the median income of Black/African American households is about 86 percent of White households, and the median income of American Indian and Alaska Natives was 78 percent. This translates into a median income of \$25,119 for Black/African American households, and \$22,813 for American Indian and Alaska Natives households.

Racial and ethnic groups such as Asian and Hispanic households have a slightly higher median income than the jurisdiction. Asian households have median household incomes of \$29,892 while Hispanic households have median incomes of \$29,741.

If they have needs not identified above, what are those needs?

Education levels of Detroit residents show a disparity between the non-white minority population and the White population. This educational gap can mean the difference between economic opportunities, higher incomes, and improved housing conditions. Based on an analysis of the data, 20 percent of the White population ages 25 and above has a bachelor's degree compared to only 12 percent of the Black/African American population and 5 percent of the Hispanic population.

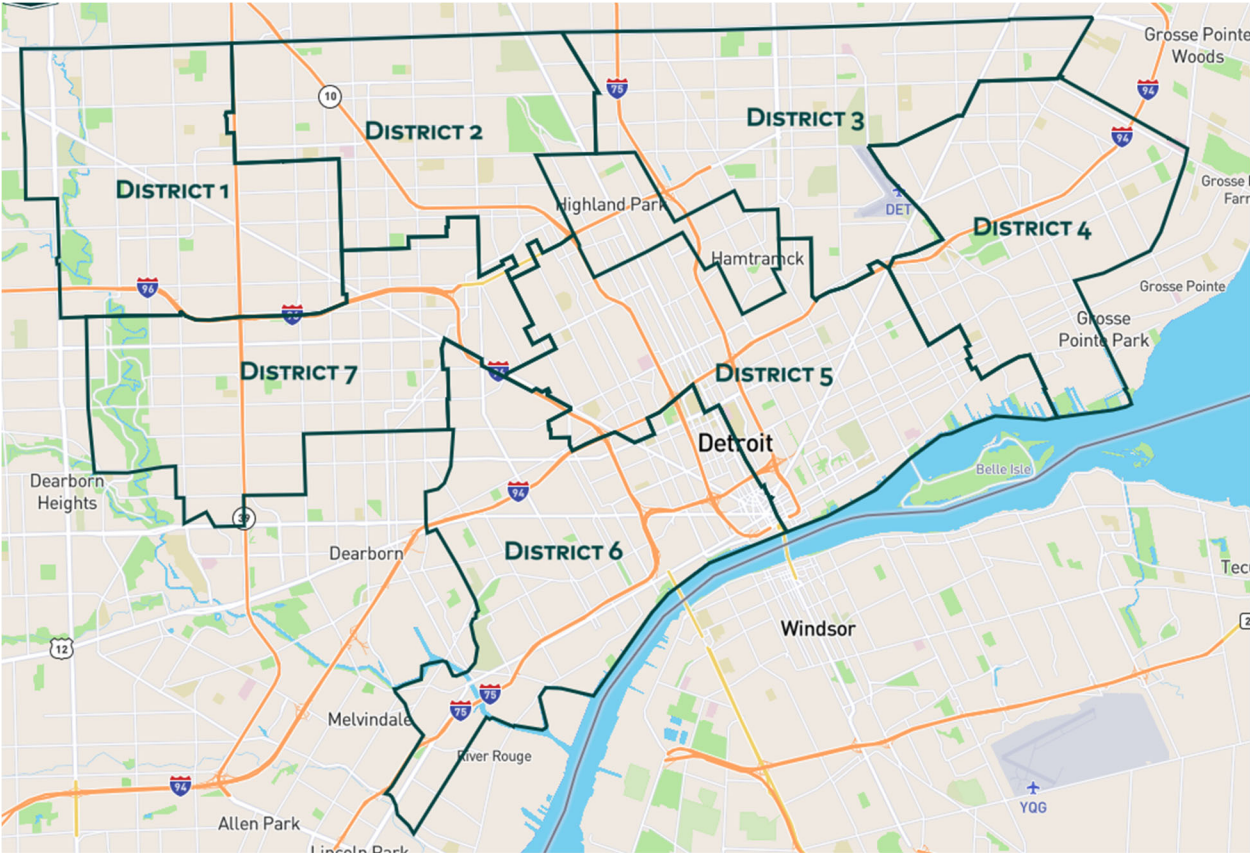
A positive correlation between income and education exists, i.e. those with higher levels of education have higher incomes and lower levels of poverty. In Detroit, for individuals with just a high school diploma the poverty rate is 35 percent, while those who hold a bachelor's degree or higher have a poverty rate of 14 percent. To further illustrate the correlation, the median income of a bachelor's degree holder is \$36,996, which is much higher than the median income of a resident with only a high school diploma at \$20,932. A key need in Detroit is educating the workforce so they can take advantage of economic opportunities as they arise.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

The poverty rate for Detroit is about 40 percent and consistent across all racial and ethnic groups. This shows that many residents are struggling economically and are also in need of assistance. Geographically, Detroit has a large land area and lower levels of density, therefore the population is spread across many neighborhoods. Black/African Americans constitute over 82 percent of the population and live in all neighborhoods. The White population accounts for about 13 percent and is also spread throughout the city but have greater concentrations in the eastern part of the city, particularly in City Council Districts Three and Five. Hispanic/Latino residents comprise about 8 percent of the population and are generally concentrated in the southwest portion of the city which aligns with City Council District Six. Asian residents, who account for 1 percent of the population, are concentrated in City Council District Three.

The Asian population is composed of a variety of groups including the Hmong, who began arriving in Detroit in the 1970's from Southeast Asia.

Map 7: City Districts



NA-35 Public Housing – 91.205(b)

Introduction

In 1933 the City of Detroit established the Detroit Housing Commission (DHC) under the Michigan Housing Facilities Act. Throughout DHC's 87-year history their mission has been to provide safe, decent, and affordable housing for low- and moderate-income people. DHC is the largest owner of rental housing in the City of Detroit with nearly 4,000 units. The DHC also operates the Housing Choice Voucher Program (HCV), formerly known as Section 8, through its Assisted Housing Department. Households that can secure public housing or HCV's are predominately very low-income, and in many cases extremely low-income. Given the number of low-income households in Detroit, demand for affordable housing is strong while current supply is insufficient.

Having a secure and safe place to live is the most immediate need of residents in public housing and/or those who have Housing Choice vouchers. Aside from a secure and safe home, is the need for employment opportunities which pay wages that enable households to move up and out of public housing. Additionally, access to educational resources can help individuals gain new skills, knowledge, and training to be competitive in the workforce. The city is actively working on improving the condition of public housing units in Detroit to ensure residents have a safe place to live. The City has nearly 4,000 public housing units and provides about 6,000 housing vouchers to qualifying households. Of the total housing vouchers available, 448 housing vouchers were given to the elderly, while 1,488 vouchers were given to families with a disabled member, highlighting the fragility of the population. Residents of public housing, or households with vouchers are predominately low-income, and in many cases extremely low-income.

The lack of long-term and well-paying employment is an immediate need for public housing residents and voucher recipients because without access to better economic opportunities the status quo is likely to remain. In addition to economic opportunities, access to social and community-based services can help residents of public housing and those with vouchers. The elderly and disabled comprise a significant minority of public housing/voucher recipients, and these populations required wrap-around services ensure their quality of life and dignity.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of unit vouchers in use	0	289	2,641	5,546	26	5,483	0	22	0

Table 22 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	6,103	9,744	11,943	12,102	11,887	0	12,764
Average length of stay	0	3	5	6	4	6	0	9
Average Household size	0	1	1	2	1	2	0	4
# Homeless at admission	0	0	47	0	0	0	0	0
# of Elderly Program Participants (>62)	0	22	803	448	26	420	0	0
# of Disabled Families	0	70	716	1,488	0	1,478	0	9
# of Families requesting accessibility features	0	289	2,641	5,546	26	5,483	0	22
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	8	26	150	0	150	0	0	0
Black/African American	0	281	2,610	5,339	26	5,276	0	22	0
Asian	0	0	0	11	0	11	0	0	0
American Indian/Alaska Native	0	0	5	37	0	37	0	0	0
Pacific Islander	0	0	0	9	0	9	0	0	0
Other	0	0	0	0	0	0	0	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	2	12	27	0	27	0	0	0
Not Hispanic	0	287	2,629	5,519	26	5,456	0	22	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

Based on the PIC data, there were a total of 5,546 housing vouchers being used by households in Detroit. Within the total housing voucher numbers: 448 housing vouchers for the elderly, and 1,488 vouchers are for disabled families. The request for accessibility features in housing units is universal throughout the entire public housing stock with all 5,546 families requesting such features. Section 504 of the Rehabilitation Act of 1973 prohibits discrimination based on disability in any program or activity that receives financial assistance from any federal agency, including HUD. Generally, the need for unit accessibility is associated with wheelchair access. Modifications are also done to support hearing impairments and occasionally modifications to support visual impairments.

The DHC complies with the Americans with Disabilities Act (ADA) requirements in its housing stock and programs. As part of its capital improvement program and repositioning strategy, DHC is working to update all its units to comply with ADA. Upgrades were completed for the Interior of the buildings at Sheridan, Warren West, and Woodbridge Senior Village. Additionally, compliance renovations were completed at Smith Homes, Warren West, Woodbridge Senior Village, DHC Administration Office at 1301 E. Jefferson, and Forest Park. The Detroit Housing Commission only has two waiting lists, one for public housing and one for Section 8 vouchers. Applicants can request “reasonable accommodation” for persons with disabilities.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

Having a secure and safe place to live is the most immediate need of residents in public housing and/or those who have Housing Choice vouchers. Residents of public housing, or households with Housing Choice vouchers are predominately low-income, and in many cases extremely low-income. The lack of long-term and well-paying employment is an immediate need for this population group because without access to better economic opportunities the status quo is likely to remain. In addition to economic opportunities, access to social and community-based services can help residents of public housing and those with Housing Choice vouchers. The following is a list (not exhaustive) of some of the immediate needs of residents including those on the waiting list for accessible units:

- Access to educational and credentialing programs to encourage skill development.
- Worker readiness, job training, job placement, and job retention services.
- Transportation for special needs population.
- Access to affordable daycare facilities.
- Wheelchair access throughout all buildings in the DHC inventory as well as privately-owned units participating in the HCV program.
- Financial literacy and planning services.
- Mobility counseling and housing search assistance for voucher holders.
- More affordable housing in safe neighborhoods that also have employment opportunities and community amenities.

How do these needs compare to the housing needs of the population at large?

The needs of public housing residents and holders of HCV's are generally like the needs of the broader public in that most would like to live in housing which safe, modernized, and close to employment centers and transportation nodes. One key difference between the general population and households in public housing or those receiving HCV's is that households receiving housing assistance have lower incomes. Given the low incomes of this population group, support services in the form of job training, skill development, and childcare are needed to ensure that this group can thrive economically.

What makes existing housing assistance recipients different than the broader public is that ideally DHC residents and HCV holders should not have any housing quality or affordability problems. Public Housing residents are in subsidized housing units which are affordably priced based on income; additionally, these units are regularly inspected to ensure no physical issues exist. Low-income disabled residents may experience housing problems regarding universal design and accessibility, however, the DHC is working towards modernizing its housing inventory to make all units accessible.

In addition to rental housing, the DHC has developed a homeownership program where eligible public housing residents can achieve homeownership. Using its Housing Choice Voucher (HCV) and Family Self Sufficiency Programs (FSS) jointly, families are offered a homeownership option during annual recertification and home ownership information sessions. The DHC partners with lenders and housing counseling agencies and are currently working with 22 HCV participants to become potential homeowners in the 2020 calendar year.

Discussion

The DHC created a comprehensive Capital Improvement Plan which addresses the needs of properties based on the guidance received from the Physical Needs Assessment. The Plan was created and is executed in accordance with HUD guidance and regulations. DHC has effectively expended and administered the Capital Fund Program (CFP) to improve and preserve DHC properties. This resulted in substantial improvements of Public Housing Authority (PHAS) indicators and Real Estate Assessment Center (REAC) property inspections scores. The Detroit Housing Commission has used the projected CFP award amount of \$8,586,102.00 for 2019-2023 budget projections.

Key highlights from the Capital Improvement Plan include:

- Complete roof replacements at Sheridan II, Algonquin, and Sojourner Truth (21 Buildings).
- ADA Compliance (504 Renovations) upgrades were completed for the Interior of the buildings at Sheridan, Warren West, and Woodbridge Senior Village.
- Site work 504 Compliance renovations were completed at Smith Homes, Warren West, Woodbridge Senior Village, DHC Administration Office at 1301 E. Jefferson, and Forest Park.
- Window replacements and Exterior upgrades were completed at Diggs Homes, Brewster Homes, and Algonquin.
- DHC completed the sale of Lee Plaza, Woodland Tower, Douglas Homes, and multiple Scattered Site Vacant Homes/Vacant Lots.

The DHC Development Department is working to create a long-term development plan that is focused on completing the revitalization of Garden View Estates, the Villages at Parkside and developing vacant land at Smith Homes as funding is made available.

NA-40 Homeless Needs Assessment – 91.205(c)

Detroit has been effective in preventing a rise in the number of unsheltered homeless. Data shows a low incidence of unsheltered homeless with about 6 percent of the recorded homeless population going unsheltered, and of those unsheltered homeless, most refuse to engage in accessing resources. Most of the homeless population found in Detroit are persons in households with only adults, of which there are 1,306 individuals in such households. The data also shows that 97 percent of all sheltered and unsheltered homeless individuals were Black/African Americans, which indicates Black/African Americans are overrepresented given that they constitute roughly 82 percent of the population of the city.

The Stewart B. McKinney Homeless Assistance Act defines the “homeless” or “homeless individual” or “homeless person” as an individual who lacks a fixed, regular, and adequate night-time residence; and who has a primary night-time residence that is:

- A supervised publicly or privately-operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill).
- An institution that provides a temporary residence for individuals intended to be institutionalized.
- A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.

Detroit has been effective in preventing a rise in the number of unsheltered homeless. Data shows a low incident of unsheltered homeless with about 6 percent of the recorded homeless population going unsheltered. The city along with non-profits target their resources to help alleviate the plight of the homeless population.

Population	Estimate the # of persons experiencing homelessness on a given night		# of persons becoming homeless each year	# of persons exiting homelessness each year	# of persons experiencing homelessness
	Sheltered	Unsheltered			
Persons in Households with Adult(s) and Child(ren)	565	0	1797	1645	3339
Persons in Households with Only Children	1	0	27	27	54
Persons in Households with Only Adults	1306	86	3064	1968	6245
Chronically Homeless Individuals	230	34	439	790	2333
Veterans	280	9	448	494	1103
Unaccompanied Youth	99	3	477	402	879
Persons with HIV	15	6	59	40	115

Alternate Data Source Name:
2019 PIT Count Data, January 2019. Detroit CoC.

Data Source: HMIS Demographic Report, HMIS Custom Collaborative Applicant Report, HDX- 2019 HUD

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Most of the homeless population found in Detroit are persons in households with only adults. Based on the PIT data, there were 1,306 individuals in such households. Another large group found in the city were households with children, there were a total of 565 persons in that family cohort. Most of the homeless in Detroit are sheltered.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	236	12
Black or African American	1,964	77
Asian	0	0
American Indian or Alaska Native	7	2
Pacific Islander	2	0
Multiple Races	48	7
Ethnicity:	Sheltered:	Unsheltered (optional)
Non-Hispanic/Non-Latino	1,662	94
Hispanic/Latino	592	4

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

In Detroit, there were 182 households with at least one adult and one child in need of various forms of housing assistance. Of the total households, 121 were in emergency shelter and 61 were in transitional shelters. No households were left unsheltered.

According to the CoC PIT data, there were 289 veteran households in need of emergency or transitional housing. The veteran households seeking assistance were almost exclusively male individuals, with one veteran household having children present. Many veterans need wrap around services; therefore, their housing needs to be centrally located for the veteran to access necessary services. The non-veteran families also find themselves in need of wrap around services, just for different reasons. Most of these households have financial stability issues that keep them on the cusp of homelessness even when they are re-housed through homeless assistance programs.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

Point in Time (PIT) data from the Detroit CoC showed that 97 percent of all sheltered and unsheltered homeless individuals were Black/African American. The Detroit area has a roughly 82 percent Black/African American population, which indicates that they are overrepresented in the homeless population.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Detroit has been effective in preventing a rise in the number of unsheltered homeless. Data from the CoC showed a very low incident of unsheltered homeless with about 6 percent of the recorded homeless population going unsheltered, and of those unsheltered homeless, most refuse to engage in accessing resources. In many cases, multiple mental health barriers prevent individuals from obtaining and maintaining housing. Efforts continue to engage the unsheltered population until they can be housed.

Discussion:

Data shows a low incident of unsheltered homeless with about 6 percent of the recorded homeless population going unsheltered. The city along with non-profits target their resources to help alleviate the plight of the homeless population. Services are available which help transition the homeless population towards long-term stability.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b, d)

Introduction:

The special needs population in Detroit are a select grouping of individuals which include frail and non-frail elderly, persons with physical disabilities, persons with mental or behavioral disabilities, and persons with HIV/AIDS. The Census classifies disabilities in the following categories: those having a hearing or vision impairment, ambulatory limitation, cognitive limitation, and self-care or independent living situation. While there is some overlap between seniors and the disabled, many disabled individuals are not seniors and are in fact part of the working age population. Looking further at the disability household data which was obtained via HUD CHAS 2011-2015, about 37 percent of households in Detroit have at least one member with a disability based on the Census definition. Another special needs population found in Detroit are those persons affected with HIV/AIDS. In Detroit there are 5,610 individuals with HIV/AIDS. The disease touches every demographic, from the young to the elderly, Black, White, Hispanic, Native American, and Asian populations. The effect of the disease on individuals and families can be devastating due to health complications, social stigma, and disruptions to everyday life.

The special needs population requires both stability and dignity. The needs for these population groups includes housing and wrap-around social services which can help support and integrate the population into broader society and ensure everyone can live an active and full life. The sections below present information about these populations and their associated needs.

HOPWA

Current HOPWA formula use:	
Cumulative cases of AIDS reported	2,508
Area incidence of AIDS	.3% of population in Detroit
Rate per population	679.2 per 100,000
Number of new cases prior year (3 years of data)	703
Rate per population (3 years of data)	679.2 per 100,000
Current HIV surveillance data:	
Number of Persons living with HIC (PLWH)	5,610
Area Prevalence (PLWH per population)	.8% of population in Detroit
Number of new HIV cases reported last year	225

Table 26 – HOPWA Data

Data Source: CDC HIV Surveillance

HIV Housing Need (HOPWA Grantees Only)

Type of HOPWA Assistance	Estimates of Unmet Need
Tenant based rental assistance	226
Short-term Rent, Mortgage, and Utility	38
Facility Based Housing (Permanent, short-term, or transitional)	0

Table 27 – HIV Housing Need

Describe the characteristics of special needs populations in your community:

Some special needs populations found in Detroit include the elderly and those individuals with disabilities. For the purposes of this analysis seniors can be classified as individuals or households headed by those 65-years and older. According to data provided by the ACS, there are 59,843 senior households in Detroit. Additionally, seniors tend to live on fixed incomes and have higher healthcare costs which may limit the amount of money they could spend on housing. Many elderly and/or disabled individuals rely on SSI as a primary source of income which can limit their housing choice and ability to pay for other costs that may arise.

The Census classifies disabilities in the following categories: those having a hearing or vision impairment, ambulatory limitation, cognitive limitation, and self-care or independent living situation. While there is some overlap between seniors and the disabled, many disabled individuals are not seniors and are in fact part of the working age population. Looking further at the disability household data which was obtained via HUD CHAS 2011-2015, about 37 percent of households in Detroit have at least one member with a disability based on the Census definition. Disability data from the Census shows that in Detroit:

- 20 percent or 135,689 individuals have some sort of disability.
- 8 percent or 10,087 children between the ages of 5 and 17 years old have a disability.
- 27 percent or 69,473 individuals between 35 and 64 years old have a disability.
- 46 percent or 38,499 individuals over the age of 65 have a disability.

The need for home accessibility and other services for people with disabilities in Detroit is critical given the large population. Improved survival rates and increased longevity among persons with disabilities combined with an aging population and the inaccessibility of older homes in lower income neighborhoods are indicators of a growing need for services provided by local organizations.

Another special needs population found in Detroit are those persons affected with HIV/AIDS. The disease touches every demographic, from the young to the elderly, Black, White, Hispanic, Native American, and Asian populations. In Detroit there are 5,610 individuals with HIV/AIDS. The effect of the disease on individuals and families can be devastating due to health complications, social stigma, and disruptions to everyday life.

What are the housing and supportive service needs of these populations and how are these needs determined?

For the special needs population some housing services include (but are not limited to):

- Dedicated elderly housing with universal design.

- Tenant based rental assistance or permanent supportive housing for individuals with disabilities but are living independently.
- Housing for the HIV/AIDS population.
 - Transitional housing for those wanting to move to independent living but, need more structured housing to address barriers that may be preventing them from moving to independence.
 - Housing for people with multiple diagnoses need greater accessibility, short term emergency housing and shelters designed to address immediate crises.

Supportive services for the special needs' population include (but are not limited to):

- Case Management
- Substance abuse treatment
- Mental health services
- Services to enable seniors to "age in place"
- In home caregivers
- Life skills
- Job skills/job training
- Employment opportunities
- Computer skills
- Literacy programs

The special needs population requires both stability and dignity. The needs for these population groups were determined by identifying the structural barriers which these populations face and examining solutions which address these barriers. Housing and wrap-around social services at pathways towards integrating the special needs population into broader society and ensuring that everyone can live a full and active life.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

Michigan's Department of Health and Human Services HIV/AIDS surveillance data provides information on new diagnoses of HIV infection, persons living with an HIV infection, and deaths among persons with an HIV infection reported from physicians, hospitals, outpatient facilities and labs. A diagnosis of HIV infection refers to persons newly diagnosed and reported with an HIV infection in a particular year, regardless of the stage of disease at initial diagnosis. This includes persons newly diagnosed with HIV (not AIDS), persons previously diagnosed with HIV who are now newly diagnosed with AIDS, and persons concurrently diagnosed with HIV and AIDS at initial diagnosis.

In Detroit there are an estimated 5,610 individuals living with and diagnosed with HIV. The table below presents the breakdown of this data by sex. About 74 percent (4,140 individuals) of the HIV infected population are male, 24 percent (1,320 individuals) are female, and 3 percent (150 individuals) are transgender.

	Estimated Prevalence		Current Disease Status			
	Living with Diagnosed HIV Infection in 2019		HIV (not AIDS)		AIDS	
Sex at birth	Number	Percent	Number	Percent	Number	Percent
Males	4,140	74%	1,712	75%	1,834	73%
Females	1,320	24%	514	22%	617	25%
Transgender	150	2%	64	3%	58	2%
Total	5,610	100%	2,290	100%	2,509	100%

Source: Michigan Department of Health and Human Services, Detroit, Michigan HIV Surveillance Report, 2019

Of those living with HIV, many cases in the aggregate are in residents in the ages group over the age of 40. This demographic accounts for 59 percent, or 3,330 individuals, of persons living with the HIV infection in Detroit. That is not to say the focus should be on older residents. In fact, new documented cases of HIV were highest among residents under the age of 30. Interventions must continue to ensure education and safe practices are shared among all age cohorts in Detroit.

	Estimated Prevalence		Current Disease Status			
	Living with Diagnosed HIV Infection in 2019		HIV (not AIDS)		AIDS	
Age at end of year	Number	Percent	Number	Percent	Number	Percent
<13	20	0%	6	0%	3	0%
13-19	70	1%	47	2%	7	0%
20-24	330	6%	228	10%	54	2%
25-29	740	13%	444	19%	187	7%
30-39	1,140	20%	543	24%	431	17%
40-49	1,150	20%	405	18%	579	23%
50-59	1,370	24%	403	18%	773	31%
60+	810	16%	214	9%	475	20%
Total	5,610	100%	2,290	100%	2,509	100%

Source: Michigan Department of Health and Human Services, Detroit, Michigan HIV Surveillance Report, 2019

The racial group that is most impacted by the HIV infection are Black/African Americans. This group accounts for 90 percent of individuals living with the HIV infection in Detroit. The White population accounts for 5 percent of the total HIV infections. These rates closely mimic the racial and ethnic composition of the city.

	Estimated Prevalence		Current Disease Status			
	Living with Diagnosed HIV Infection in 2018		HIV (not AIDS)		AIDS	
Race/Ethnicity	Number	Percent	Number	Percent	Number	Percent
Black	4,950	87%	1,996	85%	2,249	90%
Hispanic	200	4%	93	4%	76	3%
White	310	7%	149	6%	113	5%
Other	150	2%	52	2%	71	3%
Total	5,610	100%	2,290	100%	2,509	100%

Source: Michigan Department of Health and Human Services, Detroit, Michigan HIV Surveillance Report, 2019

Discussion:

The special needs population in Detroit is of considerable size and tend to have different needs than the general population. The needs of this community are related to affordable and accessible housing, social services, transportation, healthcare, and employment. Members of the special needs community are a vulnerable population group and require additional consideration from policymakers.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction’s need for Public Facilities:

The City of Detroit funds many different public service activities. It is in the interest of the City to make sure these services are provided in facilities that are up to code and ADA compliant. To be eligible for funding a group must be a non-profit organization that operates a public facility open to the public at least 35 hours a week. These facilities are typically:

- Neighborhood facilities
- Parks and recreation facilities
- Youth facilities
- Senior facilities

How were these needs determined?

Needs are assessed through the Department's annual CDBG Request for Proposals for Public Facility Rehabilitation and document analysis. Document analyses include the City Master Plan of Policies, Capital Agenda, Detroit Works Project, and- Market Value Analysis to help guide community development needs and resource allocation.

Describe the jurisdiction’s need for Public Improvements:

Large scale projects are usually identified and funded through the City's capital planning process, however a percentage of CDBG funds is sometimes used on public improvements. HRD previously managed a commercial facade improvement program with CDBG funding as well as funding small scale infrastructure improvement projects such as new sidewalks and repaved streets and alleys. The City plans to restart the program in 2021 as part of the Strategic Neighborhood Fund corridors and will be reflected in the FY 2021-2022 Annual Action Plan goals and activities. These types of new infrastructure projects are usually associated with new low-to-moderate-income housing developments but can also be in existing neighborhoods where there is an unmet need.

The City will continue to develop its parks through our Park Improvement and Gateway Parks programs. Several parks throughout the city are staged to receive innovative upgrades and develop public green space that will directly strengthen neighborhoods.

How were these needs determined?

These improvement programs are assessed during the City’s annual budget process for Commercial and/or Infrastructure improvements and document analysis. Document analyses include City Plan of Master Policies, Capital Agenda, Detroit Works Project, and Market Value Analysis when determining how to fund other public improvement projects.

Describe the jurisdiction's need for Public Services:

Per the CDBG regulations at 24 CFR 570.201 (e)(1), the City is limited to allocating no more than 15% of each CDBG grant to public service activities. Assigning priorities for public service dollars is difficult since the need for these funds far exceeds the amount of available funding. Through its annual Neighborhood Opportunity Fund funding and RFP process for CDBG eligible public services, the Department receives and evaluates requests and makes funding available to projects providing the greatest benefit. The current CDBG public service priorities are listed below. CDBG funds are available to provide partial support for these programs and help grantees leverage additional funding from other public and private funders. The Public Services meet the requirements of an introduction of a new service or expansion of an existing service.

Education:

- Literacy
- Enrichment/Readiness (Math & Science)
- Job Training

Senior Services:

- Transportation
- Health Services

Public Safety:

- Community/Neighborhood Based

Health Services:

- Health Services to Low/Moderate Income

Youth Recreation:

- Arts
- Sports

How were these needs determined?

The need for these services was determined through hearings, survey instruments, and agency and government consultations. City residents' opinions are gathered through hearings, e-mail, and survey instruments. Priorities are assigned based on these surveys, governmental consultations, and the HRD's Request for Proposals (RFP) process. CDBG funds are made available to community organizations to provide partial support for these priority services. These funds assist grantees in leveraging additional funding from other public and private funders.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

Detroit's residents deserve decent, safe, and affordable housing which provides a sense of dignity and community. The housing market analysis uses information about housing problems, tenure, income levels, and household type to analyze the housing needs for the City. The housing needs include housing problems, housing cost burden, public housing, non-homeless special needs housing, homelessness, and non-housing community development needs.

Based on the analysis, one of the factors impacting housing needs in the City is the number of low-income households with limited choices for housing. From the Needs Assessment, Detroit's median income declined 13 percent from 2009 to 2015 and is now \$25,764. The implications of a declining median income are significant given incomes influence housing purchase and rental decisions and overall housing affordability. Additionally, the continued decline in both population and households coupled with an older housing stock has resulted in significant problems related to declining home values, vacant housing units, and blighted housing conditions. Key findings are included in the following subsections of the housing market analysis.

Number of Housing Units: Detroit has a history of single-family homes, with units of three or more bedrooms being the most popular and 66 % of the housing stock consisting of 1-unit detached structures. The housing tenure is nearly split evenly between owner and renter households, with homeownership concentrations outside the urban core. The City's plans to preserve the affordability and quality of the existing multi-family housing stock and produce new affordable units. Significant investments in affordable housing and targeting neighborhoods encourages the development of housing.

Cost and Condition of Housing: Detroit's current median home value of \$42,300 and median rent of \$555 in Detroit are low compared to the state. Despite lower costs, population declines in Detroit along with an older stock results in a short supply of safe and affordable housing. Low income households have fewest housing choices and likely to have at least one of four housing problems. The most common housing problem in Detroit is cost burden, whereby households spend more than 30 percent of their income on housing costs. As households are forced to spend a greater percentage of their income on housing costs, disposable income for food, healthcare, education, childcare, and transportation becomes limited. In Detroit, there are 114,080 households currently experiencing some form of cost burden. The analysis of housing conditions shows that 34 % of owner-occupied and 56% of renter occupied have at least one housing problem. Aside from the cost of housing, the age of housing also impacts quality of housing. About 55 percent of all units in the city were built before 1950 with a larger number of older owner-occupied houses. Maintenance costs, lead -hazards, and loan to value ratios of over 100% can cause hardships for both owners and renters, and lead to depressed values across entire neighborhoods

Public and Assisted Housing: Outside of the private housing market, the City's public housing and the federal voucher program helps bridge some of the housing gaps in Detroit. The City has a housing portfolio

of public housing consisting of 3,968 units and has access to 5,893 federal housing vouchers administered by the Detroit Housing Commission. There is a high demand for public housing that is safe and secure which requires prioritization of housing assistance that targets family households with the greatest need. The DHC's Development Department plans to increase its development of housing for those who most need it.

Homeless and Non-Homeless Special Needs Facilities and Services: The City has programs and housing options for various population groups including seniors, persons with disabilities, veterans, victims of domestic violence, the homeless, and individuals with HIV/AIDS. Homeless Action Network of Detroit (HAND) which is Detroit's Continuum of Care (CoC) coordinates homeless service providers and facilities to provide emergency shelter, transitional housing, and permanent supportive housing to prevent and reduce homelessness. About 42 organizations are listed in the section below that provides services for the homeless and non-homeless special needs populations. The Detroit Health Department provides services to homeless persons and non-homeless persons suffering from HIV/AIDS.

Barriers to affordable Housing: Using the City's 2018 Assessment of Fair Housing report, factors such as housing stock, concentration of affordable housing and segregation from market rate housing, planning and zoning regulations, public policies, higher insurance rates by area, and predatory lending result are barriers to affordable housing. The City used the report's findings to develop an action plan which includes but is not limited to increasing awareness of fair housing laws, enforcement, coordination with other jurisdictions, working with housing developers and providers, identifying financing resources, and providing incentives to improve access and availability of housing opportunities. The plan included standards, policies, and procedures to monitor the City's fair housing goals.

Non-Housing Community Development Assessment: Using data on Detroit's workforce, economy, and human capital, this section examines how these elements influence the concentration and distribution of lower-income households across the city. For example, low levels of educational attainment translate directly into lower earning potential. Detroit high school graduates earn only 57 percent of what bachelor's degree holders earn, while those with some college or associate degrees earn about 65 percent of bachelor's degree holders. The unemployment rate for 16-24-year-olds is 55 percent, based on those who are in the workforce and not in school. Nearly 24 percent of young workers did not finish high school.

Needs and Market Analysis Discussion: The distribution of low- and moderate-income households aligns with areas challenged by different housing problems and this section highlights areas where individuals impacted by these issues are concentrated. Additionally, it provides the characteristics of the housing market in these neighborhoods and identifies key issues such as the impact the older housing stock and high percentage of cost burdened households have on housing choice.

Broadband Needs of Housing occupied by Low- and Moderate-Income Households: This section highlights the needs and availability of services to ensure low- and moderate-income households have broadband access/high speed internet and reduce "digital inequalities." Also, using 2014-2017 ACS data,

a review of computer and internet use showed that broadband access increased 42 percent with 66 percent of Detroit's households in 2017 having access.

Hazard Mitigation: In Detroit, the area's most vulnerable to climate change are generally synonymous with concentrations of poverty and people of color. This section highlights Detroit's vulnerability to natural, technological, and human-related hazards and the impact such disasters will have on low- and moderate-income residents.

The data which informs the analysis comes from the Department of Housing and Urban Development (HUD) and the U.S. Census. Specific datasets used include the American Community Survey (ACS), Comprehensive Housing Affordability Strategy (CHAS), OnTheMap, and local data from the City of Detroit.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

Detroit has a long history of development that has favored single-family homes over denser urban forms. The single-family home was a typology that became popular in the 1950’s and 1960’s just as the City of Detroit was expanding. This predisposition to single-family homes gives Detroit a more suburban character than many other older American cities, which tend to be denser and contain more multi-unit and mixed-use buildings. Data provided below, by HUD, shows that 66 percent of Detroit's housing stock consists of 1-unit detached structures. About 10 percent of the housing stock consists of 2-4-unit structures and only 5 percent consists of 5-19 units. Larger apartment structures consisting of 20 or more units make up only 12 percent of housing units.

Based on the popularity of the single-family home, units with three or more bedrooms are the predominate housing type and account for about 59 percent of all units. Of owner households, about 77 percent have three or more bedrooms. While in renter households three or more-bedroom units only account for 42 percent of the housing stock. These types of units tend to be found in larger apartment buildings rather than single-family homes.

All residential properties by number of units

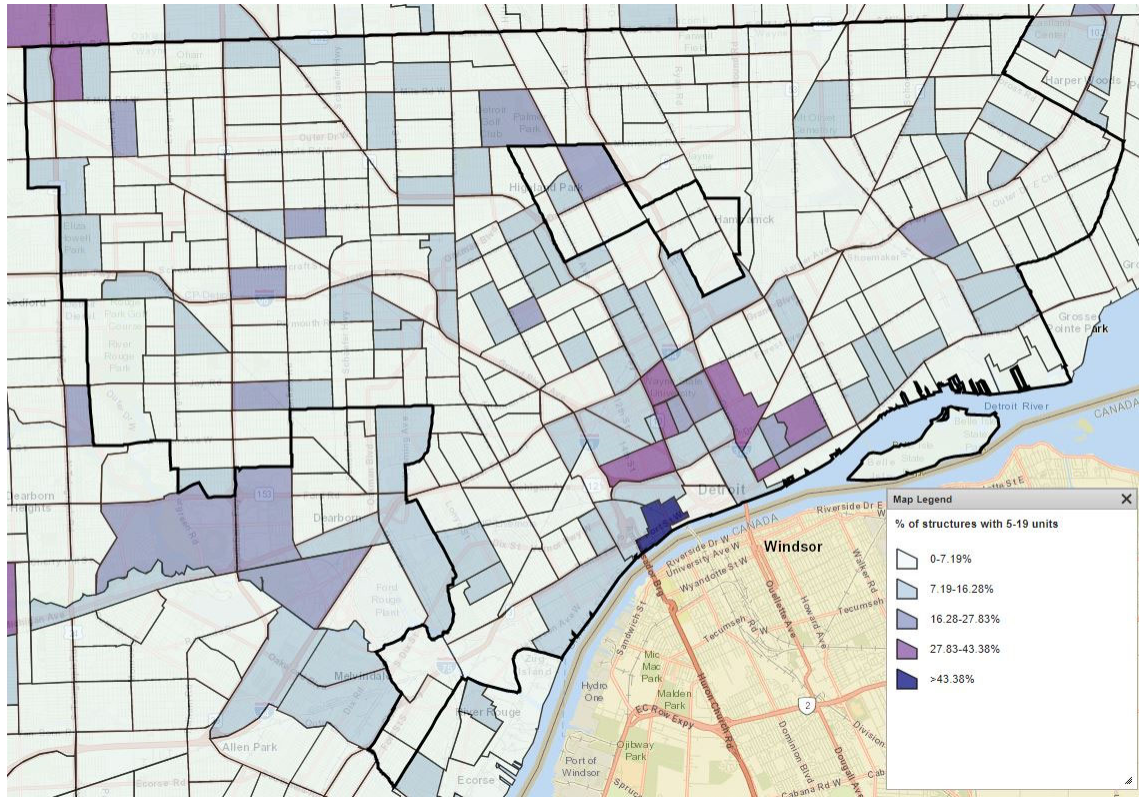
Property Type	Number	%
1-unit detached structure	240,665	66%
1-unit, attached structure	25,980	7%
2-4 units	35,075	10%
5-19 units	19,530	5%
20 or more units	42,610	12%
Mobile Home, boat, RV, van, etc.	1,670	0%
Total	365,530	100%

Table 28 – Residential Properties by Unit Number

Data Source: 2011-2015 ACS

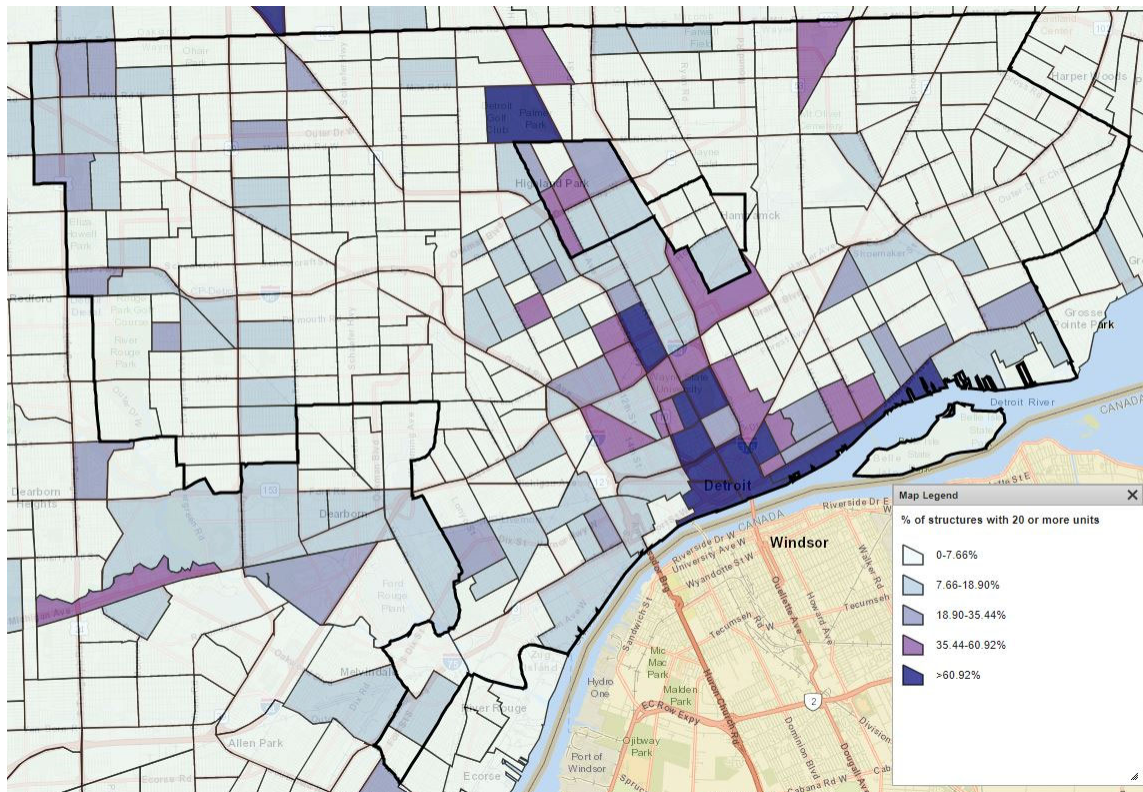
The map below presents the distribution and percentage of structures having between 5 and 19 residential units across Detroit’s Census Tracts. These medium size structures make up about 5 percent of the total housing stock and are generally clustered along the periphery of Downtown and Midtown.

Map 1: Percent of Structures with 5-19 Units



The map below presents the distribution and percentage of structures having 20 or greater residential units across Detroit's Census Tracts. These large size structures make up about 12 percent of the total housing stock and are generally clustered in the downtown core and surrounding areas. The greatest intensity can be found in Downtown and Midtown with over 61 percent of the structures having greater than 20 units.

Map 2: Percent of Structures with 20 or More Units



Unit Size by Tenure

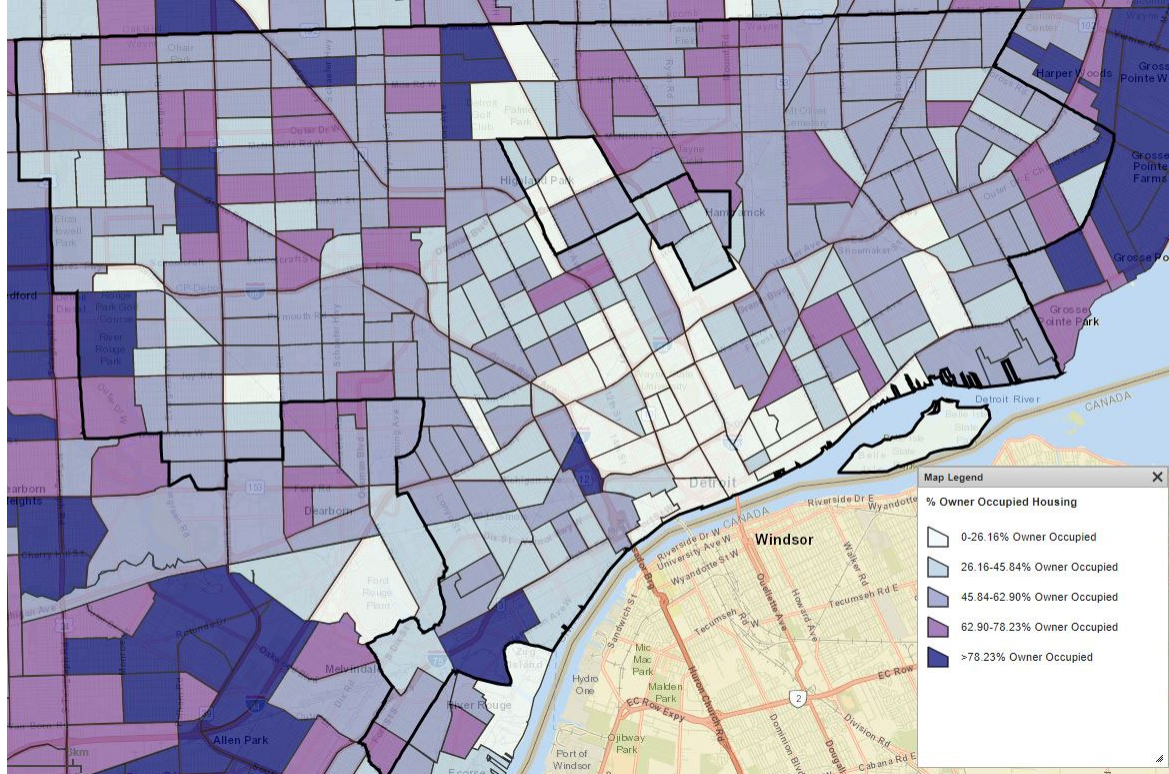
	Owners		Renters	
	Number	%	Number	%
No bedroom	325	0%	5,720	4%
1 bedroom	2,185	2%	29,480	23%
2 bedrooms	26,780	21%	40,055	31%
3 or more bedrooms	97,060	77%	54,135	42%
Total	126,350	100%	129,390	100%

Table 29 – Unit Size by Tenure

Data Source: 2011-2015 ACS

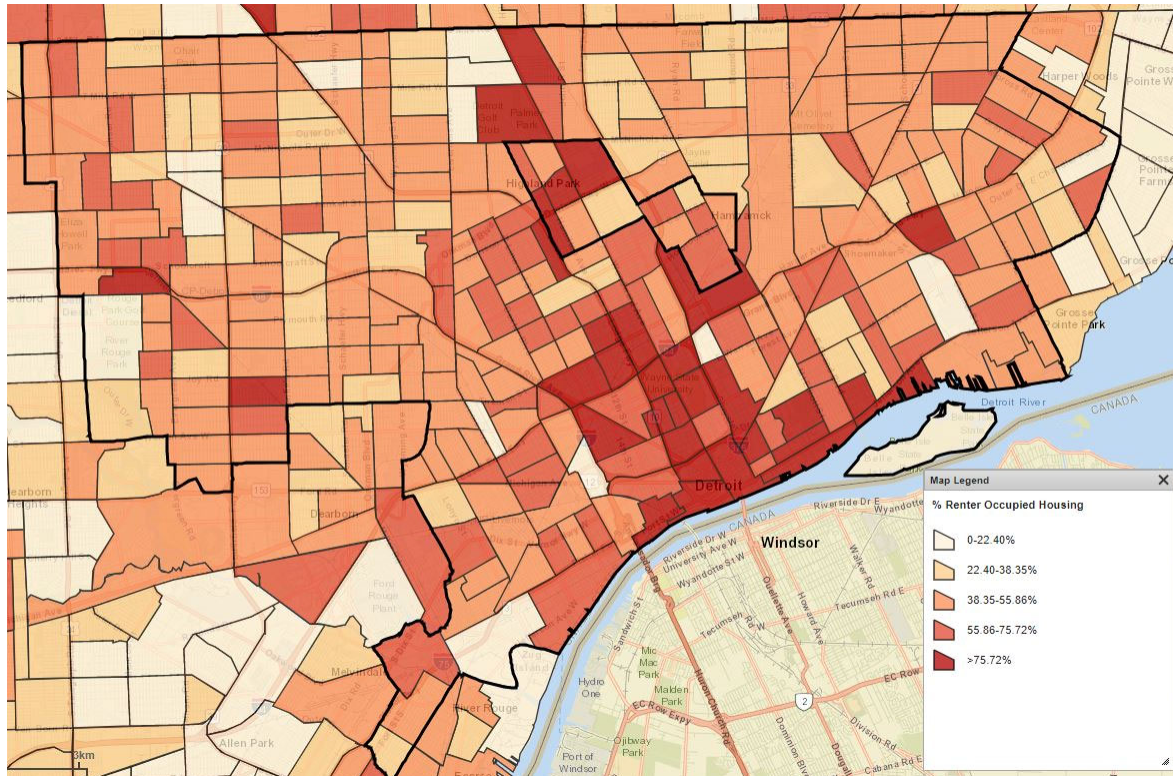
The City is nearly split evenly between owner and renter households. The map below presents the distribution and percentage of owner-occupied housing across Detroit’s Census Tracts. What is noticeable from the map is that concentrations of homeownership tend to take place outside the urban core, particularly along the northwest and northeast portion of the city. In these areas, homeownership tends to range between 46 percent and 63 percent of all households.

Map 3: Percent of Owner-Occupied Housing



The map below presents the distribution and percentage of renter-occupied housing across Detroit's Census Tracts. What is noticeable from the map is that concentrations of rental units tend to take place within the urban core, with rental units accounting for greater than 75 percent of the units. In recent years, neighborhoods such as downtown and midtown have experienced increases in residential apartment units, particularly along Woodward Avenue.

Map 4: Percent of Renter Occupied Housing



Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

The City of Detroit is focused on two fronts: preserving the affordability and quality of the existing housing stock and producing new housing that is priced affordably to people across a range of incomes. Both approaches support the City’s objective to provide residents with quality affordable housing and options accessible to public transit, employment hubs, and other essential services. The City has made significant commitments to affordable housing, including taking aggressive action to preserve affordable housing and requiring new multifamily housing developments receiving direct public financial support to include at least 20% of units affordable to households making up to 80% of Area Median Income (AMI) (with public financial support defined as investments of federal housing development funds or the sale of public land at below market value).

The Multi-Family Housing Strategy outlines the key strategies the City will pursue to reach its goals. Central to these strategies is the City’s commitment to make the lead investment of \$50 million to establish the Affordable Housing Leverage Fund (AHLF) and work with financial institutions and philanthropic stakeholders to build a \$250 million fund. This fund will be used to preserve existing affordable housing, produce new affordable housing, including supportive housing, and strengthen neighborhoods through investments in large-scale single-family stabilization projects.

The AHLF primarily finances affordable multi-family rental housing; however, for-sale and single-family projects are also considered. The AHLF invests in housing that is affordable to households at or below 60% Area Median Income (with consideration of households up to 80% AMI for for-sale projects). Housing cost burden is an acute challenge for Detroit residents at the lower end of the income spectrum, and AHLF seeks 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. 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.

The Detroit Housing Commission is actively participating in the wholesale repositioning of its portfolio through Section 18, Rental Assistance Demonstration (RAD) to upgrade buildings, stabilize cash flow to operate the property, and provide rental assistance to those who need it. The housing commission is currently focused on completing the revitalization of Garden View Estates, the Villages at Parkside, and Woodbridge Estates. The Garden View Estates site consists of 638 total units - 308 are Annual Contributions Contract (ACC), 272 are LIHTC and 58 market-rate. Woodbridge Estates was expected to be completed in February 2020 with the entire revitalization project resulting in a total of 687 units – 327 ACC, 247 LIHTC and 113 market rate units. At present the DHC does not have any active RAD units but does have 600 LIHTC units.

The housing commission is also working on transitioning some public housing residents towards homeownership. Over the past 18 months (2019- 2020) DHC's Homeownership program has conducted 5 complete home closings. The program is marketed through the regular Housing Choice Voucher (HCV) Program as well as the Family Self Sufficiency Program (FSS) at the time of recertification and during Homeownership Informationals held annually. There is also outreach within the FSS Program. In doing so every HCV participant learns of the HO program. The housing commission, in partnership with Huntington Bank and SEED, is currently working with 22 HCV participants to become potential homeowners in the 2020 calendar year.

The city is also targeting several neighborhoods to encourage the development of housing plans which result in new or rehabilitated units for households at various income levels. These plans are an attempt to improve neighborhood conditions and affordability. The neighborhoods where planning is currently taking place include:

- Grand River Northwest
- Warrendale/Cody-Rouge
- Livernois/McNichols
- Russel Woods/Nardin Park
- Southwest/Vernor
- Delray
- Greater Corktown
- Rosa Parks/Clairmount
- Eastern Market
- East Riverfront
- Islandview/Greater Villages
- Campau/Banlatown
- Gratiot/7-Mile
- East Warren/Cadieus
- Jefferson Chalmers

Across the neighborhood plans, goals are being formulated and investments are being targeted towards low- and moderate-income households. As an example, in Grand River/ Northwest Detroit, almost 70 percent of the properties are single-family residential lots, of which 10 percent are single-family lots currently owned by a land bank authority. The plan looks to implement both short-term and long-term master planning strategies to bring about housing and economic development. These strategies include:

1. Supporting new housing and economic development
2. Improving connectivity and travel experience
3. Enhancing open space and the public realm
4. Integrating green stormwater infrastructure.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

Housing unit losses are expected as the City continues its programs to combat blight through demolition and code enforcement. Demolition is an essential City activity designed to arrest blight and stabilize neighborhoods. Housing units on the demolition list are typically those that are beyond repair. The Detroit Blight Removal Task Force in 2014 estimated that 40,077 structures (residential and commercial) met the task force definition of blight, and the city undertook a large-scale demolition program to address those structures by demolishing 13,487 units between 2014 and 2018.

Aside from demolition and blight removal, units with expiring low-income housing tax credits (LIHTC) also pose a risk to the city. Launched in 1986, the LIHTC program uses tax credits to encourage private developers to create affordable housing.¹ Developers qualify for LIHTCs by agreeing to rent units to households with low incomes and to charge rents that are no more than a specified amount. Most tax credit developers choose the option under which the renters must have incomes below 60 percent of the area median income (AMI) and the rents must be no greater than 18 percent (30 percent of 60 percent) of AMI. From 1986 to 1989, federal law required developers to maintain these affordability provisions for at least 15 years. Beginning in 1990, however, new LIHTC properties were required to preserve affordability for 30 years. During the first 15 years, called the initial compliance period, owners must maintain affordability. The second 15 years are known as the extended use period, when owners can leave the LIHTC program through a relief process. Once the 15-year affordability period is over, LIHTC owners who seek and are granted regulatory relief from the program can convert their properties to market-rate units.

There have been 11,369 low-income housing units built under the LIHTC program in Detroit since the year 2000, of which 8,570 were built before 2010. Some of these units are potentially at risk of being converted to market rate units in the next five to ten years because of the changes in market conditions of certain locations and the expiration of tax credits. An example location is the Midtown neighborhood where significant public and private investment has taken place, which has resulted in rapid housing price and rent escalation. In this area there is a concentration of LIHTC projects near the Woodward Avenue corridor, between Mack and Warren Avenues. These low-income housing develops could potentially be at risk based on the surrounding market pressures.

¹ https://www.huduser.gov/portal/pdredge/pdr_edge_research_081712.html

Does the availability of housing units meet the needs of the population?

Detroit's population crested in 1950 at about 1.8 million residents and has since decreased by more than 60 percent over the last 70 years. As residents left the city, the inventory of vacant housing units began to increase. Presently, there are about 109,788 vacant housing units in the city, which accounts for 30 percent of the entire housing stock. Detroit has enough housing units to serve its residents, but a problem lies in not having enough decent, safe, and affordable housing for residents.

The existing housing stock is old and many of the units need upgrades. Despite comparatively reasonable rents and sales prices, many Detroiters experience housing problems (substandard housing, overcrowding, and cost burdens). As noted in the Needs Assessment, about 45 percent of Detroiters experience some level of housing cost burden, with 27 percent of all households spending more than half their income on housing.

Describe the need for specific types of housing:

Based on the overall conditions of the housing stock from the data provided by HUD and the Needs Assessment section of the Consolidated Plan, the following specific types of housing are needed in Detroit:

- Rental housing for singles, including the elderly and disabled.
- Permanent supportive housing for single individuals and families.
- Housing without one or more of the HUD classified housing problems.
- Affordable housing in safe neighborhoods for low- and moderate- income households.
- Lead free homes.
- Housing located on public transportation routes and close to places of employment.

Housing affordability remains a serious challenge in Detroit. The combination of lower levels of education, job and skills training, and high unemployment rates among younger residents are reinforcing lower household incomes. From a market perspective, lower household incomes translate directly to a greater need for diversity in the housing stock where units are offered at a variety of price points to match what households can afford.

Aside from affordable housing, the City needs investment in new housing to attract individuals who would live and work in Detroit. Major employers have begun locating downtown and are drawing upon regional talent. The City has an opportunity to capture their share of this demographic.

Discussion

To handle the large number of abandoned structures in Detroit, the Mayor has emphasized public safety and blight removal aimed at revitalizing neighborhoods across the city. While demolition has been a priority for many years, it is now part of a larger revitalization and neighborhood stabilization plan. Coordination amongst various governmental departments and agencies is necessary to ensure that Detroit can recover.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

Detroit rental and homeownership costs are low compared to other U.S. cities. The current home value for Detroit is \$42,300 compared to the statewide home value of \$122,400. The median home value in Detroit declined by 50 percent between 2009 and 2015 and is symptomatic of the housing and vacancy challenges that are impacting the city. The continued exodus of residents precipitates a further decline in home values as vacant homes and blight take hold in neighborhoods. The decline in home values is mostly found in older single-family structures which is the predominate housing type. Conversely, the condominium market, while small, is experiencing rapid price escalations, particularly in prime locations such as Midtown. The median condominium sales price in 2015 was \$169,335.² This shows that much of the private sector investment dollars are not flowing to traditional neighborhoods and population groups, but rather to more dense areas of Detroit with the amenities to attract more affluent residents.

Median rent in Detroit is currently about \$555 per month. This is significantly lower than the state median of \$637. Between 2009 and 2015, the median contract rent rose by 4 percent. Low-income households inevitably must cope with rising rents because landlords who own housing units that are both safe and affordable, which are generally in short supply, experience greater demand.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	85,200	42,300	(50%)
Median Contract Rent	534	555	4%

Table 30 – Cost of Housing

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	52,045	40.2%
\$500-999	71,790	55.5%
\$1,000-1,499	4,615	3.6%
\$1,500-1,999	775	0.6%
\$2,000 or more	180	0.1%
Total	129,405	100.0%

Table 31 - Rent Paid

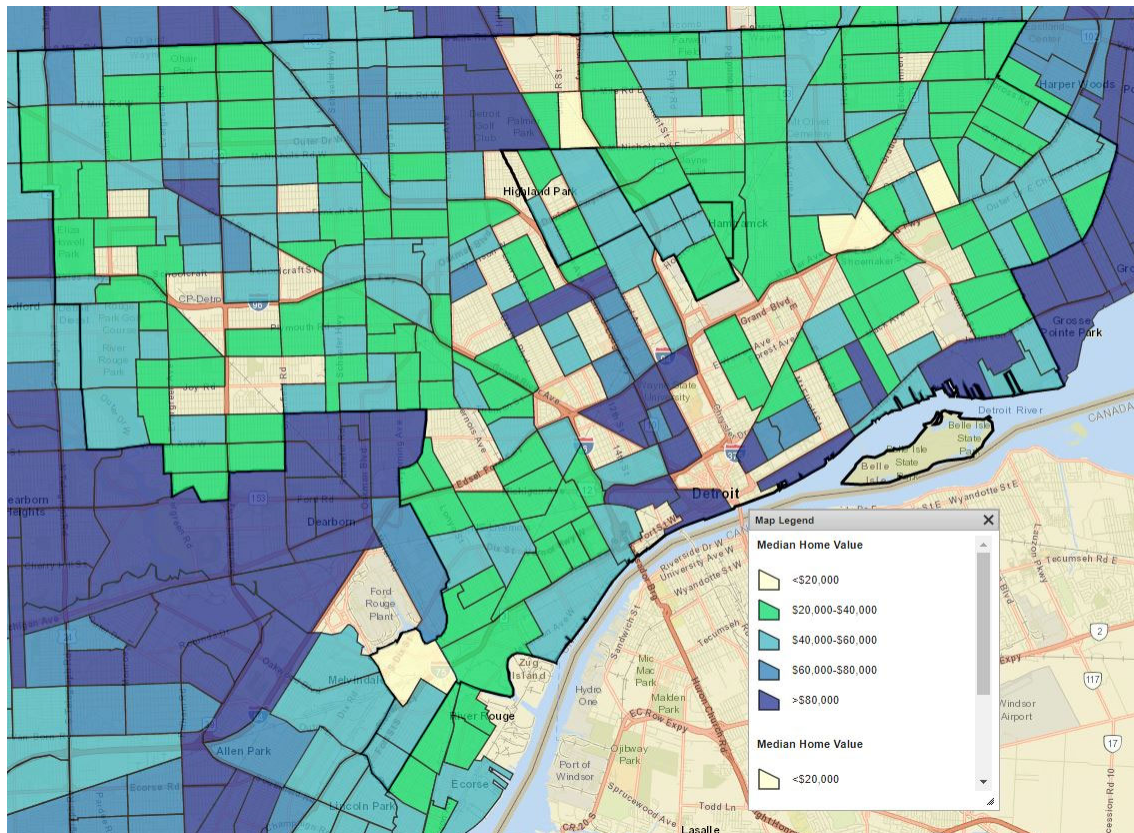
Data Source: 2011-2015 ACS

² MSHDA Ownership Housing Study, 2018]

Median Home Values and Rents

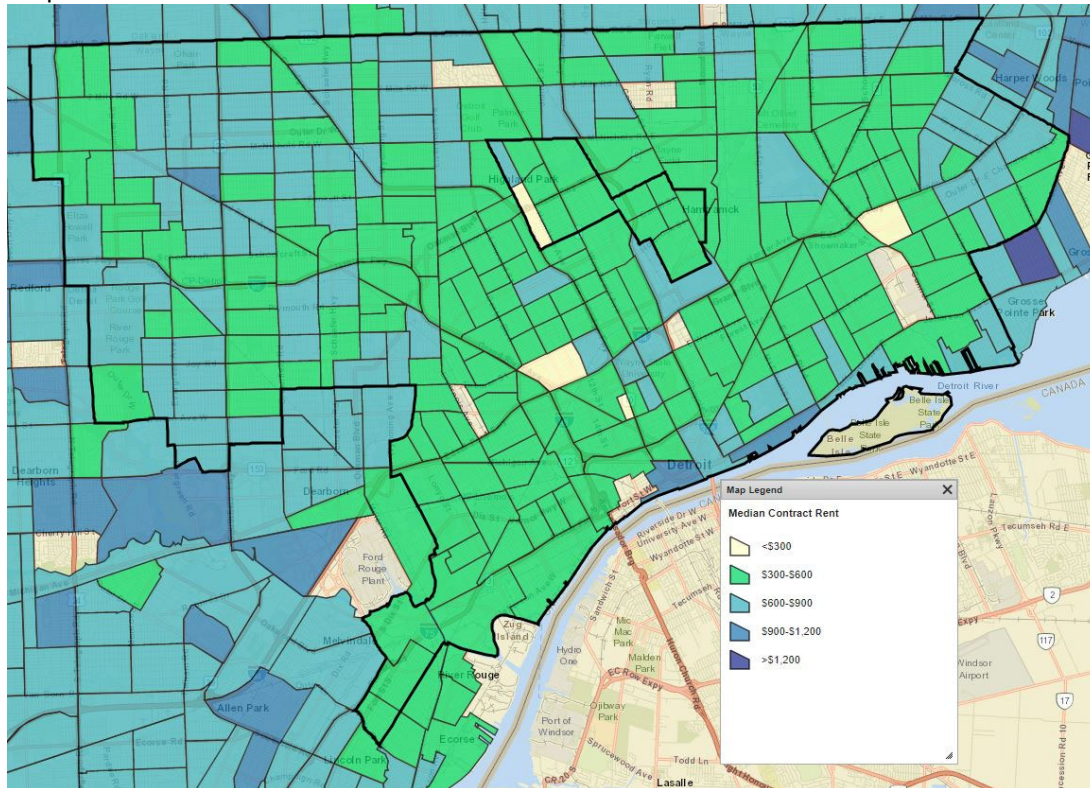
Median home values in Detroit are low. The map below presents the median home value across the city by census tract. What is immediately noticeable is that most of the homes in the city are valued at under \$60,000, with many concentrations of areas with homes valued below \$40,000. This indicates a weakness in the overall market as over the last five years' values have decreased by 50 percent.

Map 5: Median Home Value



Median contract rent in Detroit is exceptionally low, currently \$555 per month. The map below presents the median rent across the city by census tract. What is noticeable is that across the city most rents are below \$600 per month. In the outlying areas of the city there are concentrations of rents between \$600 and \$900. The highest rents can be found along the waterfront where new development is taking place.

Map 6: Median Contract Rent



Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	17,235	No Data
50% HAMFI	59,255	44,520
80% HAMFI	108,100	71,905
100% HAMFI	No Data	85,675
Total	184,590	202,100

Table 32 – Housing Affordability

Data Source: 2011-2015 CHAS

Monthly Rent

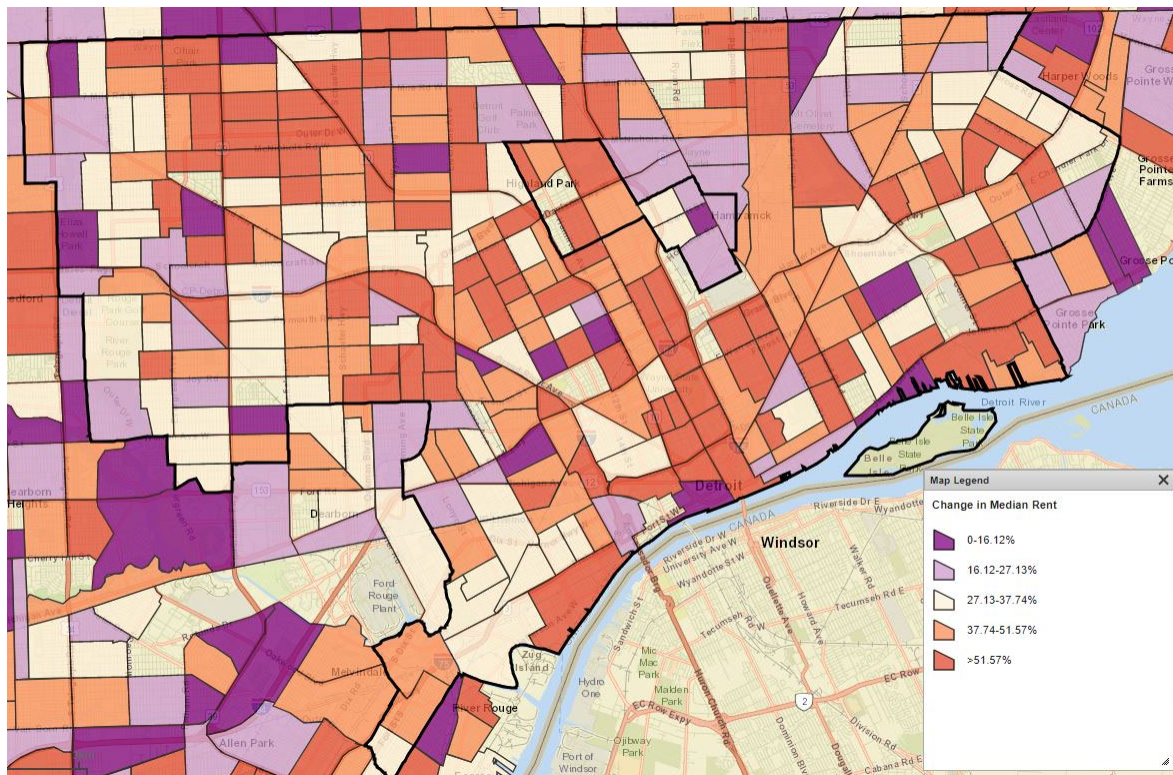
Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	621	753	967	1,261	1,371
High HOME Rent	621	753	967	1,261	1,371
Low HOME Rent	621	716	858	992	1,107

Table 33 – Monthly Rent

Data Source: HUD FMR and HOME Rents

The map below presents the percent change in median rents across Detroit's Census Tracts. City-wide rents have risen 4 percent between 2009 and 2015, however, in some census tracts rents have risen at a much faster pace. This is true in the downtown and midtown area where in some case rents have risen by more than 37 percent because of investments taking place in those areas. In general, there is a strong demand for rental units across several neighborhoods in the city which translates into higher prices.

Map 7: Change in Median Rent



Is there sufficient housing for households at all income levels?

While there are many housing units available in Detroit, there is a lack of decent, safe, and affordable housing. The housing needs assessment shows that low income households tend to have the fewest housing choices, which translates into having a greater propensity of living in units with at least one identified HUD housing issue. The key issue found in Detroit is housing cost burdening. About 45 percent of all households experience some form of cost burdening. A relationship exists between cost burdening and incomes, the lower the income the greater the propensity to experience cost burdening. In Detroit incomes are low, particularly for renter households. While in many cases, households below 30 percent of HAMFI qualify for public housing or vouchers, the waitlists for these programs are long and therefore households cannot rely on these programs with any level of certainty and must therefore pay market rents for potentially substandard housing product.

How is affordability of housing likely to change considering changes to home values and/or rents?

Between 2009 and 2015, the median value of owner-occupied units fell by 50 percent translating into more affordable home prices today compared to ten years ago. However, for households owning their homes, they experienced a significant loss in value that may result in them owing more on their mortgage than their home is worth. The overall decline in value has an impact on the for-sale market as buyers may be less willing to invest in declining neighborhoods and lenders may be more cautious.

Some of the decline in owner-occupied housing values is likely due to the after-effects of the Great Recession. In neighborhoods where vacant and foreclosed units were major issues, values on those properties and surrounding properties likely fell. As homes remained vacant, or languished in foreclosure, many homes continued to deteriorate and ultimately had to be condemned or demolished. Blight has a profound impact on housing values for the remaining occupied units in a neighborhood, as the area may now give off the perception of being unsafe or undesirable.

For renter households, the opposite is true. Median contract rents have risen 4 percent creating affordability challenges for some of Detroit's most at-risk households. These price increases occurred over a period when median household income declined by 13 percent. Not only did monthly rent prices increase, but household incomes declined.

Even though 40 percent of households pay less than \$500 a month in rent, which is below the fair market rent for a one-bedroom unit, many households experience housing problems including cost burdening. As such, affordability can be tackled by creating pathways toward increasing incomes and unlocking resources for programs which make homes available to low- and moderate-income households. Efforts directed towards this goal should include:

- Education and job training.
- Economic development programs that assist in attracting higher wage jobs to Detroit and retention of existing jobs.
- Improved transportation access.
- Down Payment Assistance.
- Assistance for home repairs/rehabilitation and energy efficient upgrades.
- Deep rental subsidies for extremely low-income renters.
- Financial literacy training.
- Home maintenance training.

By increasing housing affordability and improving incomes, households will experience more financial stability, be able to invest in the long-term upkeep of their homes and stabilize neighborhoods that may still be feeling the aftereffects of the Recession.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

The median contract rent for Detroit in 2015 was \$555 per month, which is less than nearly all the HUD FMR monthly rents. For one-bedroom units, the HUD FMR rent was \$753 per month which is about 36

percent greater than the median rent. For two-bedroom units the fair market rent was \$967 per month, or 74 percent greater. Similarly, for three-bedroom units, the HUD FMR rent was \$1,261 per month, and is about 127 percent greater than the median rent in Detroit.

Median contract rents in Detroit are a direct reflection of what households can afford to pay. The city has a very low median income compared to both Wayne County and the State. Additionally, due to the large blight and vacancy problem, rents tend to remain low particularly in already distressed areas. However, even with relatively cheaper rents, households still have difficulty affording housing. The high levels of vacancy and blight across the city also depress property values and provide essentially no incentive to property owners or developers to introduce a significant amount of new product to the market. Rental units priced toward the bottom of the market are likely in older structures that need repair or may have some of the housing issues that HUD regularly tracks.

The table below presents the Median Gross Rent by Bedroom for Detroit. While this information is not the same as contract rent (gross rent is the contract rent plus the estimated average monthly cost of utilities and heating fuels) what can be observed is that the FMR is still higher than the median gross rents found in Detroit. For two-bedroom units, the HUD FMR rent is \$967 while the median gross rent is \$746. This indicates that rents from strictly a pricing standpoint are very low and that the HUD FMR is not actually capturing the market reality because it uses the Metro Area as part of its calculation.

Detroit	Efficiency (no bedroom)	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms
Median Gross Rent	\$520	\$554	\$746	\$920	\$948
Source: ACS 2011-2015					

Preserving naturally occurring affordable housing (NOAH) in Detroit may require a strategy of working with existing owners to improve the conditions of units, particularly those located within older structures where maintenance has been neglected over time. One of the issues is providing enough incentives to owners to invest capital in housing which may not yield significant cash flow. The City may be required to provide significant subsidies for rehabilitation projects.

Discussion

To make decent, safe, affordable housing available to low income households, subsidies are required because redevelopment costs may be greater than expected cash flows.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

Most of Detroit's housing stock was built before 1980. Due to age, many of these homes are likely in need of some level of repair. The city has lost more than 60 percent of its population over the last 70 years, which resulted in large numbers of vacant and abandoned properties. The City actively monitors and assesses housing conditions to ensure public safety and compliance with rules and regulations. The City is focused on removing every abandoned structure in every neighborhood. The US Treasury's Hardest Hit Fund Program enabled the City of Detroit to allocate \$107.3M towards blight elimination.³ The 2014 Detroit Blight Removal Task Force report identified 40,077 blighted structures, and an additional 38,429 structures with strong indicators that they would become blighted in the future. The funding was used to demolish 13,487 structures.⁴

A consequence of the population loss is that new unit construction is minimal, and that the rehabilitation and renovation of structures has become more of the norm. Through investments in neighborhoods, communities can be strengthened and revitalized. Additionally, those neighborhoods that are on the cusp of seeing increased vacancy and lower property values, can be bolstered via targeted investment in people, jobs, and housing.

Definitions

Blight - Is a public nuisance; an attractive nuisance; a fire hazard or is otherwise dangerous; has had the utilities, plumbing, heating or sewerage disconnected, destroyed, removed, or rendered ineffective; a tax reverted property; owned or is under the control of a land bank; has been vacant for five consecutive years; and not maintained to code, has code violations posing a severe and immediate health or safety threat; open to the elements and trespassing.

Blight Indicators - Structures that did not meet the definition of blight yet had the following characteristics: were unoccupied and/or abandoned, or were publicly owned by local or state authorities, or owned by Government Sponsored Entities (such as Fannie Mae and Freddie Mae).

Standard Condition – Unit meets HUD Housing Quality Standard (HQS) and all state and local codes and is made lead safe.

Substandard Condition – Units that have not met the above standards but are both structurally and financially feasible to rehabilitate.

³ <http://www.demolitionimpact.org/#creative-solutions>

⁴ https://dlba-production-bucket.s3.us-east-2.amazonaws.com/City_Council_Quarterly_Report/DLBA+Q2+FY2020+CCQR.pdf

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	42,515	34%	72,105	56%
With two selected Conditions	1,850	1%	4,355	3%
With three selected Conditions	130	0%	200	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	81,855	65%	52,730	41%
Total	126,350	100%	129,390	100%

Table 34 - Condition of Units

Data Source: 2011-2015 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	2,310	2%	6,789	5%
1980-1999	2,785	2%	10,720	8%
1950-1979	45,020	36%	48,210	37%
Before 1950	76,230	60%	63,670	49%
Total	126,345	100%	129,389	99%

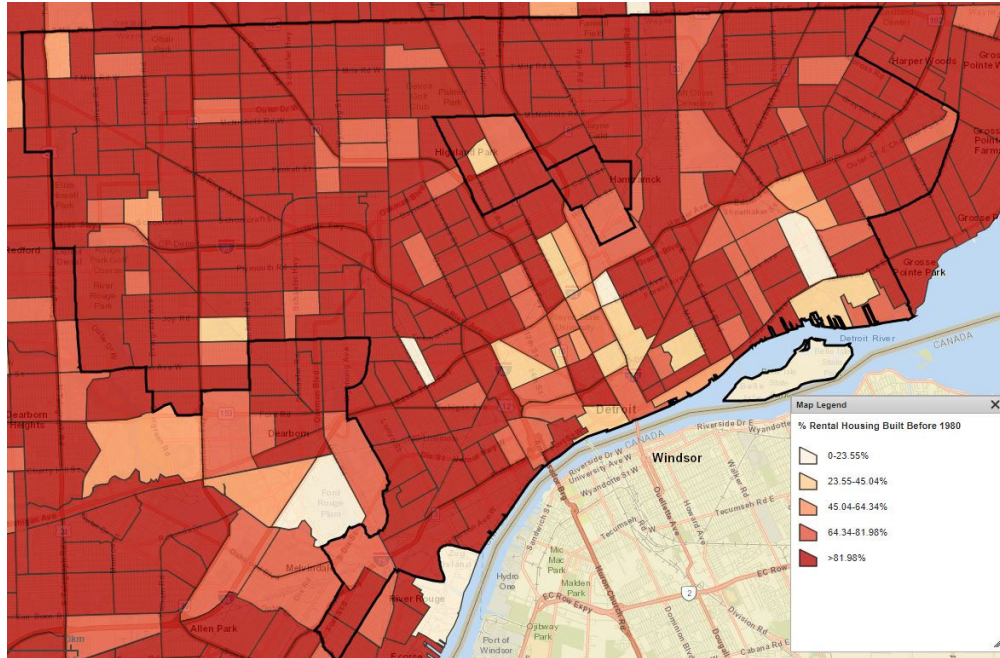
Table 35 – Year Unit Built

Data Source: 2011-2015 CHAS

Age of Housing

Across Detroit, most rental units were built before 1980; the map below presents the percentage of rental units across the city's census tracts. The City of Detroit experienced rapid growth between 1920 and 1960, after this period there has been an extended decline. The result of this is that most of the structures built within the city limits were built during the period of growth. Housing units built before 1980 have the potential for lead-based paint.

Map 8: Percent of Rental Housing Built Before 1980



Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	121,250	96%	111,880	86%
Housing Units built before 1980 with children present	3,685	3%	725	1%

Table 36 – Risk of Lead-Based Paint

Data Source: 2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	19,362⁵	2,152	21,514⁶
Abandoned Vacant Units	35,485⁷	35,485	70,970⁸
REO Properties			
Abandoned REO Properties			

Table 37 - Vacant Units -Vacancy Rates

⁵ Estimate 90% of vacant units in this category are suitable for rehabilitation

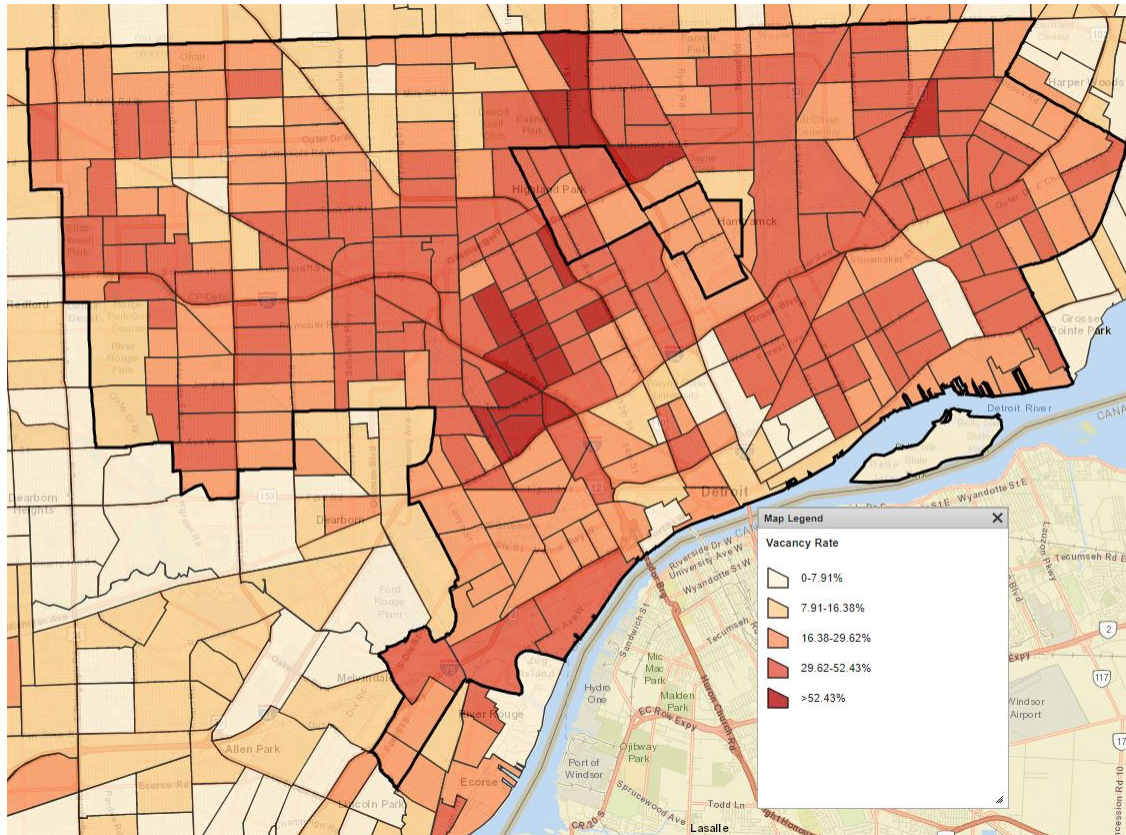
⁶ American Community Survey 2019 1-year Estimates Table B25004 -Units “For Rent”, “Rented Not Occupied”, “For Sale Only”, “Sold Not Occupied”, “For Seasonal Recreational or Occasional Use”, “For Migrant Workers”

⁷ Estimate 50% of vacant units in this category are suitable for rehabilitation based on DLBA Prop N Estimates and the Blight Task Force Report

⁸ American Community Survey 2019 1-year Estimates Table B25004 - Units “Other Vacant”

Local housing conditions are a contributor to housing values and an influencer of market forces. There are 109,788 vacant housing units in the city, which accounts for about 30 percent of the entire housing stock. Vacancy has increased by 11 percent between 2011 and 2015. Of the vacant units, 72 percent or 78,501 are classified as Vacant-Other which indicates these units may be in various states of disrepair, have title issues, or may have been abandoned. Between 2011 and 2015, the number of units categorized as Vacant-Other increased by 23,194 units or 42 percent. The increase in vacancy occurred even though the Detroit Land Bank has an active demolition program. The map below presents the vacancy rate by census tract.

Map 9: Vacancy Rate



Need for Owner and Rental Rehabilitation

Local housing conditions are a contributor to housing values and an influencer of market forces. There are 109,788 vacant housing units in the city, which accounts for about 30 percent of the entire housing stock. Vacancy has increased by 11 percent between 2011 and 2015. Of the vacant units, 72 percent or 78,501 are classified as Vacant-Other which indicates these units are in various states of disrepair, have title issues, or have been abandoned. Between 2011 and 2015, the number of units categorized as Vacant-Other increased by 23,194 units or 42 percent. The increase in vacancy occurred even though the Detroit Land Bank has an active demolition program. Aside from vacant units there are many housing units

currently inhabited which have housing problems. The categories of selected conditions defined by HUD are:

- Lacks complete plumbing facilities
- Lacks complete kitchen facilities
- More than one person per room
- Cost burden greater than 30%.

Of all the housing units found in the city, about 47 percent, or 121,155 units have one of the selected conditions. From the Needs Assessment, the predominate condition is cost burdening where households are spending greater than 30 percent of their income on housing.

Aside from units which are completely vacant, the need for rehabilitating occupied structures is also great for rental and owner-occupied units. The rehabilitation of units offers residents safety and security in their homes. Improvements such as upgraded electric, mechanical systems, windows, roofs, and lead paint abatement improve quality of life for residents. The City offers a variety of programs to address some of the key rehabilitation issues. One such program is the Detroit 0% Home Repair Loan Program which offers zero percent interest loans from \$5,000 to \$25,000 to help Detroit homeowners invest in and repair their homes – promoting public health and safety, increasing property values and helping residents secure and maintain homeowner’s insurance.

From the data there are 42,515 owner-occupied units and 72,105 renter-occupied units with one housing problem. The Needs Assessment showed most households in the 0 – 30% income bracket are living in conditions which cause them to have either a housing problem or a severe housing problem. The sales price points and monthly rents paid by households across the city may be an indicator that the current housing stock is older and not well-maintained. If housing values are not increasing, it may be more difficult to encourage homeowners and building owners to invest in their properties when they are unlikely to see a return on that investment. Residents with longer-term plans to stay in Detroit may be more likely to make that initial investment as they will have a longer period to pay it back, but residents with shorter time frames or older residents are less likely.

Estimated Number of Housing Units Occupied by Low- or Moderate-Income Families with LBP Hazards

In total, about 233,130 housing units or 91 percent of all the housing stock in Detroit was built before 1980 which can be an indicator for risk of lead-based paint. Lead paint is an environmental hazard which can have particularly harmful effects on children in the home if not taken care of. Based on data provided by HUD there are 4,410 housing units (both renter and owner) which were built before 1980 and have children living in them who may be at risk of exposure. While difficult to determine the exact number of homes containing lead-based paint hazards, a new emphasis on cleanup and/or safe demolition of homes, and stricter landlord laws have spurred improvement in mitigating lead-based paint risks.

Discussion

Based on the findings of the Blight Task Force Report from 2014, the city undertook a demolition program utilizing the US Treasury’s Hardest Hit Fund Program funds. The city allocated and spent \$107.3M on blight elimination and demolition. Since funding for the program has been cut, the City of Detroit is exploring alternative funding sources including CDBG to achieve its goal of eliminating blight.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

Having a secure and safe place to live is the most immediate need of residents in public housing and/or those who have Housing Choice Vouchers (HCV), formerly known as Section 8. Households lucky enough to secure public housing or HCV's are predominately very low-income, and in many cases extremely low-income. Given the size of the city and number of low-income households, demand for affordable and available housing in Detroit is high while there is not enough supply available.

With such a high level of demand, prioritization of housing assistance takes place to target family households with the greatest need. Effective July 1, 2018, the Detroit Housing Commission (DHC) began using local preferences for its public housing program.⁹ Categories of households which receive preference include:

- Families Displaced by Federally Declared Disaster
 - Applicants displaced by a federally declared disaster occurring after July 1, 2005.
- Disabled Families
 - Applicants with a disabled head of household, spouse, or sole member.
- Local Preference Related to VAWA Victims
 - Applicants that are victims of domestic violence, dating violence, sexual assault, or stalking
- Local Preference Related to Homeless Families
 - DHC will provide housing assistance to homeless families who are referred for assistance through formal agreements with partnering organizations.

The HCV program is a rental housing assistance solution that places housing choice in the hands of the individual or family. DHC pays a portion of the rent directly to a private landlord. Program participants pay the balance of the rent directly to the private landlord. Applicant families are selected from the waitlist and determined eligible. Each year, DHC conducts a random lottery and 7,000 applicants are selected for placement on the Housing Choice Voucher Waitlist. There are no preferences for random lottery selection.

Totals Number of Units

Program Type	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	264	3,968	5,893	0	5,893	0	724	0
# of accessible units									

⁹ http://www.dhcmi.org/uploads/page/DHC_Public_Housing_WL.pdf

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 38 – Total Number of Units by Program Type

Data PIC (PIH Information Center)
 Source:

Describe the supply of public housing developments:

The DHC has a housing portfolio consisting of 3,968 Public Housing units and 5,893 HVC’s. DHC also provides programs and opportunities designed to improve the total quality of life for residents, with the goal of achieving self-sufficiency. The HCV program includes tenant-based vouchers, project-based vouchers, and special purpose vouchers. The housing developments owned and operated by the DHC are located across the city and take a variety of forms, from low-rise developments to high-rise buildings. The developments tend to be older and their physical conditions vary. DHC has a strategy to reposition, rehabilitate, and redevelop their portfolio in the coming years.

One of DHC’s organizational goal is to also participate in the wholesale repositioning of its portfolio through Section 18, Rental Assistance Demonstration (RAD) or other programs to upgrade the physical plant, stabilize cash flow to operate the property, and provide rental assistance to those who need it. DHC will expand its Development Department to partner with its HOPE VI partners in the RAD process. The Development Department is currently working to create a long-term self-development plan that is focused on completing the revitalization of Gardenview Estates, the Villages at Parkside and developing vacant land at Smith Homes as funding is made available. Staff is evaluating the possibility of initiating RAD contracts for developments within the DHC’s portfolio including the Mixed Finance Projects.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

There are 41 public housing developments in the DHC site listing. These developments have an average Real Estate Assessment Center (REAC) score of 83. The Public Housing Condition table below includes the name of the development and the HUD REAC data (inspection scores). There are only ten developments which have a score of less than 80.

Development Name	Inspection Score
Woodbridge Estates Phase X	99
Woodbridge IV	99
Woodbridge III	98
Garden view Estates Phase III D	96
Woodbridge V	95
Unnamed	95
Woodbridge - Senior Enhanced	95
Cornerstone Estates 7B	94
Garden view Estates II B	94
Cornerstone Phase VIIC	93
Garden view Estates II A	93
Woodbridge Estates II	92
Garden view Phase IV	92

Development Name	Inspection Score
Riverbend Towers	92
Garden view Estates Phase III C	92
Jeffries Homes	91
Garden view Estates III A	91
Garden view Estates II C	91
Garden view Estates	91
Emerald Springs 1A	90
Warren West	90
Garden view Estates III B	89
Greenbrook	88
Emerald Springs 1B	87
Woodbridge Estates I	87
Emerald Springs Phase II	85
Algonquin	84
Sojourner Truth	84
Cornerstone Estates 7A	84
Scattered Sites	81
Harriet Tubman	80
Smith Homes	79
State Fair Apartments	74
Scattered Sites	70
Brewster-Douglas	68
Sheridan Place I	66
Scattered Sites	65
Alexandrine Square Apartments	63
Parkside Village IV Rehab	62
Diggs Homes	47
Parkside Village II Rehab	35
Source: HUD, 2019	

Public Housing Condition

Public Housing Development	Average Inspection Score
All developments	83

Table 39 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

The DHC created a comprehensive Capital Improvement Plan which addresses the needs of properties based on the guidance received from the Physical Needs Assessment. The Plan was created and is executed in accordance with HUD guidance and regulations. DHC has effectively expended and administered the Capital Fund Program (CFP) to improve and preserve DHC properties. This resulted in substantial improvements of Public Housing Authority (PHAS) indicators and REAC property inspections

scores. 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 used the projected CFP award amount of \$8,586,102.00 for 2019-2023 budget projections.

Key highlights from the Capital Improvement Plan include:

- Complete roof replacements at Sheridan II, Algonquin, and Sojourner Truth (21 Buildings).
- ADA Compliance (504 Renovations) upgrades were completed for the Interior of the buildings at Sheridan, Warren West, and Woodbridge Senior Village.
- Site work 504 Compliance renovations were completed at Smith Homes, Warren West, Woodbridge Senior Village, DHC Administration Office at 1301 E. Jefferson, and Forest Park.
- Window replacements and Exterior upgrades were completed at Diggs Homes, Brewster Homes, and Algonquin.
- DHC completed the sale of Lee Plaza, Woodland Tower, Douglas Homes, and multiple Scattered Site Vacant Homes/Vacant Lots.

The DHC Development Department is working to create a long-term self-development plan that is focused on completing the revitalization of Gardenview Estates, the Villages at Parkside and developing vacant land at Smith Homes as funding is made available. The DHC plans to create an internal development division. This will allow DHC to partner with private/public entities and compete for financial assistance including but not limited to Low Income Housing Tax Credits, grants, traditional equity, New Market Tax Credits, and conventional financing. In addition to gaining full-service status that will enable DHC to compete for development projects that supports their affordable housing mission; DHC will explore mixed use developments to generate additional nonfederal income.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

Based on the DHC Five Year Plan, the organization looks to transformation itself and become a more resident-centered customer service organization. DHC will focus on lease enforcement, including rent collection and improving maintenance. DHC will also participate in the wholesale repositioning of its portfolio and upgrade the properties, stabilize cash flows, and provide increased rental assistance to those who need it. Based on the shortage of affordable public housing for all eligible populations, DHC outlined four objectives to maximize its resources for housing programs:

- Objective 1: Annually assess the DHC's policies regarding continued occupancy in public housing.
- Objective 2: Continue to actively pursue the completion of modernization/rehab of existing public housing, scattered sites housing to increase utilization of these properties.
- Objective 3: Demolish or dispose of obsolete scattered sites public housing units and consider various repositioning strategies including, replacement housing RFPs to identify potential mixed finance redevelopment where feasible.
- Objective 4: Increase utilization of the LIPH program's current unit inventory

DHC will streamline its HCV program to encourage more landlord participation. It will work with the City of Detroit to identify opportunities for landlords to ensure their properties consistently comply with HUD standards to increase units under the program. In addition, DHC will continue to deconcentrate poverty and provide voucher holders with opportunities to live in more socio-economically diverse neighborhoods. HCV Program goals will also include:

- Serving a designated population of young, disabled persons through local partnerships.
- Reaching full HCV program utilization, maximizing the program funding with the maximum number of vouchers.
- Working with owners and developers to improve awareness of housing quality requirements to reduce HAP abatement activity.
- Building on the project-based voucher program to provide affordable housing opportunities throughout the communities.
- Expanding the project-based voucher program to include DHC owned/ developed/ operated properties.
- Working with HUD to secure vouchers associated with Opt-Outs and/or Expiring contracts in Multi-family units. This will allow DHC to broaden the depth of the program and continue affordable opportunities for residents.
- Working with HUD on opportunities to manage or absorb troubled operations in the jurisdiction.
- Strengthening the HCV Homeownership program and marketing the program to qualified participants and increasing the utilization by 10 % annually.

HCV Homeownership

Over the past 18 months leading into FY 2019- 2020, DHC's Homeownership program has closed on five public housing residents achieving homeownership. The program is marketed through the regular Housing Choice Voucher (HCV) Program as well as the Family Self Sufficiency Program (FSS) at the time of recertification and during Homeownership Informationals held annually. There is also outreach within the FSS Program. In doing so every HCV participant learns of the HO program. The DHC, Huntington Bank, and SEED are currently working with 22 HCV participants to become potential homeowners in the 2020 calendar year.

Discussion:

DHC's goals and objectives are consistent with their core business of providing decent, safe, and affordable housing to low-moderate income families, regardless of race, color, religion, national origin, sex, familial status, and disability. The goals and objectives are consistent with HUD's vision of supporting mixed income communities.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

This section presents information about homeless service providers and facilities found in Detroit. The organizations and services are part of the Homeless Action Network of Detroit (HAND) which is Detroit’s Continuum of Care (CoC). This organization helps manage the local planning process for communities to provide a full range of prevention, emergency shelter, transitional housing, permanent supportive housing. Specific groups helped include homeless and chronically homeless individuals, veterans, families, and unaccompanied youth.

The definitions below provide greater detail regarding the types of housing provided for the homeless population:

- **Emergency Shelter** - Any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless, and which does not require occupants to sign leases or occupancy agreements.
- **Transitional Housing** - A project that is designed to provide housing and appropriate supportive services to homeless persons to facilitate movement to independent living within 24 months, or a longer period as approved by HUD.
- **Permanent Supportive Housing** - Permanent housing in which supportive services are provided to assist homeless persons with a disability to live independently.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year-Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	314	0	167	973	N/A
Households with Only Adults	649	93	422	1978	10
Chronically Homeless Households	N/A	0	0	2309	10
Veterans	36	0	221	640	N/A
Unaccompanied Youth	9	0	103	N/A	N/A

Table 40 - Facilities and Housing Targeted to Homeless Households

Source: HUD 2019 Continuum of Care Homeless Assistance Program, 2019 Detroit CoC Housing Inventory Count, Homeless Action Network of Detroit, 2019 Housing Inventory Chart, HMIS Chronic BNL Inflow Report, HMIS Discharge Destination Report

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

The following services are all provided by various homeless service providers in the Detroit CoC:

- Alcohol/drug abuse treatment
- Case management
- Childcare
- Education & employment
- HIV/AIDS-related services
- Life skills
- Mental health treatment
- Transportation assistance

Providers determine the type and protocol for service delivery. Eligibility is generally linked to the funding source of the service. For providers that do not offer these services directly, referrals are made to other community providers that do provide such services.

The Detroit Health Department also provides services to homeless persons, especially those suffering from HIV/AIDS. The Housing Opportunities for Persons with AIDS (HOPWA) program provides housing assistance and related support services for low-income persons living with HIV/AIDS and their families. This program helps to address discrimination, stigma, and other barriers to achieving stable living situations. HOPWA Detroit has two programs which help these households, the Tenant Based Rental Assistance Program is an income-based program in which HOPWA pays a portion of a household's rent with the remainder being paid by the householder. The second program is the Community Residential Program which provides housing for a period of 6 months to two (2) years based on individual assessment of the householder.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

See chart below.

City of Detroit Services and Facilities		Population Served			
Service Provider	Description	Chronically Homeless Individuals & Families	Families with Children	Veterans and their Families	Unaccompanied Youth
Cass Community Social Services, Inc.	Cass provides emergency shelter, transitional and permanent supportive housing for all populations. Supportive services are available to hundreds of homeless persons and families each night.	X	X	X	X
Rescue Mission Genesis II	Serving 48 women and 14 children. Women in this program often are working on substance abuse aftercare issues, addressing legal issues, and attend school and training programs to give them a future.		X		
Detroit Rescue Mission Ministries (Oasis)	Abuse and Treatment Center, Emergency Shelter, Transitional Housing, & Permanent Housing. Men, many of whom are struggling with addiction, debt, and difficulty finding employment. Houses 25 men who are homeless veterans of the armed forces and 25 men with mental health or substance abuse disability.	X		X	
Matrix Off the Streets - For Homeless Teens	Provides shelter and other services to homeless youth, or vulnerable teens. Provides voluntary crisis intervention and supports to families and youth.				X
Coffer Adult Foster Care Home	Adult Foster care home.	X			
Derrick's Adult Foster Care	Adult Foster care home.	X			
Covenant House Michigan	Emergency Shelter Teens only.				X
DRMM Detroit Rescue Mission	Emergency Shelter Men Only. All Male Emergency Shelter & Transitional Housing.	X		X	

City of Detroit Services and Facilities		Population Served			
Service Provider	Description	Chronically Homeless Individuals & Families	Families with Children	Veterans and their Families	Unaccompanied Youth
NSO Tumaini Center	The Tumaini Center is a crisis support center for chronically homeless individuals. Established in 1975 and provides services to all who enter their doors including substance abuse treatment, mental health assessment and referral, case management, emergency food, and clothing storage.	X			
Detroit Rescue Mission	Emergency shelter. Founded in 1909, The Detroit Rescue Mission Ministries has embarked upon its 100th year of continued service providing food, shelter, and services to intervene upon homelessness and substance addiction throughout Detroit and its surrounding metropolitan communities.	X			
Coalition on Temporary Shelter (COTS)	Provides an array of services that enable people to achieve self-sufficiency and obtain quality affordable housing. COTS also exist to advocate for long-term solutions to the problems of homelessness.	X			
Mighty Voices of Hope Inc.	Mighty Voices of Hope is an organization that brings awareness of the homeless situation in the metro Detroit area. They currently feed and house local homeless men who used to live in vacant homes or on the street.	X			
Mariners Inn	The Transitional Housing (TH) Program is a supportive, semi-independent living experience available to men who have successfully completed the Mariners Inn Residential Treatment Program. The Transitional Housing Program offers living space and meals in an alcohol- and drug-free residential recovering community environment.	X			
Open Door Rescue Mission Ministries	Assistance for: homeless; addicted; mentally or emotionally challenged.	X			

City of Detroit Services and Facilities		Population Served			
Service Provider	Description	Chronically Homeless Individuals & Families	Families with Children	Veterans and their Families	Unaccompanied Youth
Bethlehem House	Shelter for homeless workingwomen without children. Ages from 35-65. Must be employed and homeless. Counseling, money management and bible study. Drug and alcohol rehabilitation not available.	X			
The Philip House Mission	Emergency shelter, transitional housing, independent / supportive housing, men and women facilities, job assistance, domestic training, substance abuse prevention, case management, application/intake process, and counseling.	X	X		
Operation Get Down	Transitional Housing - Family		X		
New Path Homeless Shelter	Private rooms, shared rooms, fully furnished, kitchen, bath, and laundry.	X			
Skyline Outreach	Links people to homes for veterans, seniors, displaced seniors, HIV victims, and others.		X		
Transition 1.2.3. Inc.	Transition is an emergency transitional housing facility that allow homeless (domestic) women and their child to have a safe environment that can move to a place of self-efficiency through various programs	X		X	
Refuge International Inc.	Emergency Shelter Transitional Housing - Family		X		
Eastside Emergency Center	Shelter for homeless youth between the ages of 8 and 24.				X
Genesis One Transitional Youth Center	Clean, Safe, Low-Cost Supportive Housing Residency with Great Oaks is meant to bridge the gap from homelessness to permanent housing. They assist individuals in becoming economically self-sufficient and stable by providing low barrier, emergency housing with a variety of support services.				X

City of Detroit Services and Facilities		Population Served			
Service Provider	Description	Chronically Homeless Individuals & Families	Families with Children	Veterans and their Families	Unaccompanied Youth
Alternatives for Girls	Mission is to help homeless and high-risk girls and young women avoid violence, teen pregnancy and exploitation, and help them to explore and access the support, resources and opportunities necessary to be safe, to grow strong and to make positive choices in their lives.				X
Community Social Services Wayne County	To develop partnerships with like-minded organizations, inspiring action that results in rebuilding broken lives and restoring dignity.	X			
Covenant House	Covenant House Michigan (CHM) provides shelter and hope to young people ages 18-24 who are experiencing or at risk of homelessness.				X
Detroit Central City Community Mental Health	The Supportive Housing Division is comprised of numerous programs servicing individuals with varying needs and/or circumstances including, military veterans, domestic abuse survivors, people with severe mental illness and co-occurring disorders (severe mental illness and substance abuse) and people with physical or health disabilities who may also have a substance abuse problem.	X	X	X	X
Detroit Rescue Mission Ministries	From homeless veterans to men seeking recovery from substance abuse, from women struggling to make ends-meet, to homeless women with children – DRMM offers both transitional and permanent housing to prevent any return to homelessness and addiction.	X	X	X	
Emmanuel House	Emmanuel House per Diem Transitional Housing program is designed to provide quality, affordable housing programs and services to homeless veterans in the Metro Detroit area.			X	

City of Detroit Services and Facilities		Population Served			
Service Provider	Description	Chronically Homeless Individuals & Families	Families with Children	Veterans and their Families	Unaccompanied Youth
Freedom House	Freedom House Detroit is a temporary home for indigent survivors of persecution from around the world who are seeking asylum in the United States and Canada.	X			
Michigan Veterans Foundation	The Foundation operates their main project, the Detroit Veterans, Center which is a transitional housing facility and resource center. The DVC provides the skills and confidence needed for homeless veterans to break the cycle of homelessness and return to independent living.			X	
Neighborhood Legal Services of Michigan (NLSM)	NLSM provides financial assistance, housing relocation and stabilization services to those who are determined to be eligible for prevention rapid re-housing.	X			
Neighborhood Service Organization (NSO)	NSO's empowering programs and services help older adults with mental illness; children, youth, and adults with developmental disabilities; homeless recovery services; housing development; community outreach for psychiatric emergencies; and volunteer opportunities for individuals, groups, and organizations.	X	X		X
New Day Multi-Purpose Center	Shelter and warming center during cold-weather extremes.	X			
Positive Images	Provides a women specialty program, intensive substance abuse treatment, domicile, integrated services (substance abuse and mental health treatment combined), childcare, shelter, support services, referrals to ancillary services, and collaborates with existing community programs.	X	X		
Ruth Ellis Center	Social services agency that serves the needs of runaway, homeless and at-risk lesbian, gay, bisexual, and transgender (LGBT) youth.				X

City of Detroit Services and Facilities		Population Served			
Service Provider	Description	Chronically Homeless Individuals & Families	Families with Children	Veterans and their Families	Unaccompanied Youth
Southwest Counseling Solutions	Provide a broad range of programs in the areas of human development, economic development, and community engagement.	X	X	X	
St. John's Community Center	Shelter and warming center during cold-weather extremes.	X			
The Salvation Army	Provides social assistance to various groups.	X			
Travelers Aid Society of Metro Detroit	Traveler's Aid of Metropolitan Detroit provides leading human services that sustain, attract, and inspire confidence and excellence in their clients, employees, and community partners. They support and nurture self-sufficiency among Detroit's most vulnerable by offering a hand-up not a hand-out.	X			
Volunteer of America (VOA)	Their services, from housing and employment support to mental health care, help veterans overcome the barriers that stand between them and long-term stability. Through prevention, rapid rehousing, interim housing, transitional housing, permanent housing, job training and compensated work programs, they make it possible for veterans to have a roof over their heads and the professional opportunities they deserve.			X	
YWCA	YWCA works every day to eliminate racism and empower women. Through advocacy and local programming, they create real change for women, families, and communities.		X		

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

This section describes facilities and services that assist persons who are not homeless but who require supportive housing and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing. Special needs population in Detroit includes the frail and non-frail elderly, persons with physical disabilities, persons with mental or behavioral disabilities, and persons with HIV/AIDS.

The City of Detroit receives the Housing Opportunities for Persons with Aids (HOPWA grant and administers it using the Detroit Health Department. Besides the HOPWA program Senior Citizens and persons with disabilities receive services from Detroit Agency on Aging (DAA) in the following communities: Detroit, Hamtramck, Harper Woods, Highland Park, and the City of Grosse Pointe. The mission of the agency is to educate, advocate and promote healthy aging. The agency promotes senior citizens making decisions on home and community services that will improve the overall quality of life.

HOPWA Assistance Baseline Table

Type of HOWA Assistance	Number of Units Designated or Available for People with HIV/AIDS and their families
TBRA	226
PH in facilities	0
STRMU	38
ST or TH facilities	0
PH placement	0

Table 41– HOPWA Assistance Baseline

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Persons with HIV/AIDS and their families

As stated earlier the HOPWA program is the only Federal program addressing the housing needs of persons living with HIV/AIDS and their families by:

- Increasing the availability of decent, safe, and affordable housing for low-income people living with HIV/AIDS
- Creating and supporting affordable housing for people living with HIV/AIDS by linking HOPWA with resources through community planning efforts

- Creating partnerships among states and local government and community-based organizations and other non-profit organizations to meet the housing and supportive service needs of persons living with HIV/AIDS.

HIV/AIDS housing requires a multi-faceted system. As HIV/AIDS affects all demographics, recommended housing and supportive services must be demographically client specific. For example, an HIV positive and frail elderly client may need more congregate care and assisted living housing. However, another HIV client that is much younger and without the physical limitations may not require the same type of services. Similarly, an HIV positive person with a mental illness and/or substance abuse issue may require more direct disorder specific housing than an HIV positive person escaping a domestic violence relationship.

As clients are living longer with HIV/AIDS, the housing approach must match this outcome. Housing delivery must move from immediate housing to preventative homelessness measures to stabilize clients with permanent housing solutions.

Supportive housing needs may include:

- Moving costs
- Emergency housing
- Emergency cost (extermination, furniture, utility, transportation)
- Linkages with other agencies providing supportive services

Seniors – Elderly and Frail Elderly

Seniors are generally considered individuals over the age of 62 and living independently or in subsidized accommodations. Seniors live on fixed incomes, have higher healthcare costs, and a greater per capita need for aging services. Older homeowners who can function independently need help with home repairs especially with older housing stock. However high housing costs, especially for renters, makes it a financial burden for many seniors living on their own. The Detroit Housing Commission offers public housing and Section 8 housing certificates to address these basic housing needs. HRD administers an owner-occupied home repair grant program specifically for seniors who may not have the resources to maintain their older housing. The waiting list for this program is about 3,000 persons. The zero-interest home repair loan program administered by a subrecipient is not specifically for seniors but elderly homeowners can apply and be assisted. The elderly accounts for another special needs group as in Detroit, 46% or 38,499 individuals over the age of 65 have a disability.

Persons with Disabilities

The Census classifies disabilities in the following categories: those having a hearing or vision impairment, ambulatory limitation, cognitive limitation, and self-care or independent living situation. Disabled individuals account for 20% of the population, translating into 135,689 individuals. This population group will have some specialized housing and supportive needs.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Section 330.1209b of the State of Michigan Mental Health Code requires that "the community mental health services program shall produce in writing a plan for community placement and aftercare services..." Consequently, many mental health providers have either developed housing programs or work with housing providers to ensure that people are not discharged into a homeless situation. People exiting a mental health institution typically move into transitional living programs, AFC homes, or independent living. One of the barriers that make it difficult for people with disabilities to access housing is a lack of income. Therefore, the CoC and MI Dept. of Community Health have implemented the Supplemental Security Income/Social Security Disability Insurance (SSI/SSDI) Outreach, Access, and Recovery (SOAR) initiative. Providers have staff who are trained to help people gain the benefits for which they qualify in an expedited manner. The SOAR initiative has helped people with disabilities including mental health to access housing quickly.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

HIV/AIDS

The Department of Health and Wellness oversees Detroit's HOPWA program which services homeless and non-homeless persons who meet income guidelines. Most are served through HOPWA's Tenant Based Rental Assistance (TBRA) program. While the emphasis is on the TBRA program the City's HOPWA program also funds a transitional housing program as well as services and linkages to other HIV/AIDS services.

Seniors

While the City's Senior Citizens Department has closed HRD still provides some help for seniors. Every year HRD funds organizations through its CDBG allocation process to help seniors with their health and transportation needs. Senior citizens can apply for funding to fix their homes through the Senior Emergency Home Repair program, and the 0% Interest Home Loan Program. Subsidized housing as well as Section 8 Vouchers for rental housing are available for income qualified seniors. Seniors can also get help to abate lead in their homes if a child under the age of 6 lives with them or is cared for by them.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

HIV/AIDS

Under the rental assistance component of the HOPWA program, there are 233 rental subsidies currently in use in Detroit from the last CAPER. The total grant allocation for FY 2020-2021 is \$2,903,135. There are currently 30 units of transitional, short-term housing for individuals with HIV/AIDS. An estimated \$400,000 will be spent on this program. The rest will be spent on information and support services. These numbers have been steady over the last few years and is expected to be the same over the next few years.

Seniors

The City of Detroit addresses the special needs of senior citizens by providing a low-income public housing program. Senior citizens can apply to public housing at one of the six different locations throughout the City of Detroit and each public housing site also provides accommodations for persons with disabilities. Beyond what the City offers there are plenty of private profit and non-profit organizations offering senior living communities. For example, Presbyterian Villages of Michigan, a faith-based, non-profit organization offers nine senior living communities in Detroit.

In addition to housing, the city has many supportive services for seniors. Detroit Area Agency on Aging (DAAA) assists in the following areas:

- Meals on Wheels – there is more programming when it comes to food security provided to Seniors, even with DAAA
- Caregiving assistance
- Housing resources
- Transportation resources
- Support groups for family caregivers
- Utility payment assistance resources
- Services for seniors and people living with disabilities
- Help to seniors experiencing elder abuse or neglect

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Public policies can act either as barriers to affordable housing or can serve to promote it. Recognizing this and remaining cognizant of the negative effect public policies can have on housing affordability, the City of Detroit does not impose limitations such as growth controls, impact fees, exclusionary or large lot zoning requirements, or rent controls; all of which can present barriers to affordable housing. The City Planning Commission has recently undertaken a significant update to the City zoning ordinance, known as [Zone Detroit](#), to seek ways to ensure zoning laws are flexible, inclusionary and considerate of changing times and communities.

With the combined effects of a significant population loss, the recent housing crisis, and a significant number of vacant and dilapidated properties; decent, safe, and affordable housing options have decreased for many Detroit residents. Because homeownership remains out of reach for a sizeable portion of the population, the demand for affordable rental housing within the city is great. At the same time, the amount of affordable rental housing is limited. Public housing, the source of Detroit's largest number of affordable rental units, only provides an estimated 9,800 units, including voucher units. With a waiting list of 9,000 or more, the need for affordable units is critical. Because of this, in 2017 the City adopted an affordable housing ordinance requiring residential developers receiving certain subsidies or donated land from the city to offer 20 percent of their rental units to households at or below 80% AMI.

There are several other factors, some outside of the City's control, acting as barriers to affordable housing. Some of these include:

- Lack of financial resources to build affordable housing (i.e. lending institutions willing to invest in Detroit)
- Policies that promote urban sprawl
- Higher housing tax rates
- Higher insurance rates compared to nearby suburban areas
- Predatory lending practices
- Crime/perceived crime (deterrent to investing in Detroit)
- Decreased funding in CDBG/HOME and other federal funding sources
- Aging housing stock in Detroit requiring higher maintenance costs

The City commissioned the Center of Urban Studies at Wayne State University to prepare a HUD required Assessment of Fair Housing in 2018. The report noted that "investing in particular neighborhoods has occurred with private investments, as well as public and charitable investments that have focused on stabilizing neighborhoods in an urban triage approach rather than prioritizing spending in neighborhoods that continue to struggle and decline."¹⁰ The study went on to further explain the impact of the investment approach on decreasing property values in some neighborhoods and increasing development

¹⁰ Assessment of Fair Housing – City of Detroit prepared by Wayne State University/Center for Urban Studies, page 114

pressures in others leading to gentrification and relocation of low-to moderate-income households. The report identified lack of public investments in specific neighborhoods as contributing to disparities in access to affordable housing opportunities. An older housing stock, foreclosures, and deferred maintenance by elderly and low-income households or landlords unwilling to invest in property improvements result in poor housing conditions. The need to aggressively enforce housing and building codes to ensure environmental health and safety and increase the quality of housing available to residents was also highlighted. Maintaining and increasing participation in regional fair housing initiatives that improve access to opportunities and address disparities for Detroit residents was encouraged. One of the advocacy issues for regional participation is transportation access to suburban jobs and improving practical access to proficient schools.

The segregation of affordable housing from market-rate housing in new developments was cited in focus groups and recommendations were made for the City to expand its work with developers to improve affordable housing and its integration in rapid growth areas such as Downtown and Midtown. Complaints included disruption to seniors due to new developments in Downtown and Midtown where seniors were unable to afford increased rents or evicted to make way for condo conversions or new developments. Increases in fair housing complaints from these two areas suggested the need for more oversight to determine if segregation was intentional or unintentional.

As a result of the study, a fair housing action plan with goals and priorities was developed. The goals were outreach to increase awareness of fair housing laws; enforcement of housing and building codes; work with other jurisdictions to improve access to opportunity for residents; work with developers to improve quantity and quality of affordable and accessible housing including for homeownership and the elderly. The implementation of the actions and goals will be monitored by HRD staff with support from the Detroit Housing Commission, Fair Housing Of Metropolitan Detroit and Fair Housing Center of West MI, City of Detroit Building Safety Engineering and Environmental Department, and City of Detroit Civil Rights, Inclusion & Opportunity Department (CRIO) (formerly Human Rights). The actions taken and the impact of the strategies will be documented and reported on the City's annual Consolidated Annual Performance and Evaluation Report (CAPER). HRD staff will include standards and procedures to address fair housing issues and goals in its monitoring policies and procedures.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

Globalization and the decline of manufacturing greatly impacted the City of Detroit over the last 40 years and has resulted in economic decline. The automotive industry, which has been the traditional backbone of the regional economy, has dealt with changes in technology, supply chains, competition, and consumer preferences. For the city, these changes have ushered in an era of high unemployment and population migration. While the city still faces significant challenges, change is afoot, as the City is working toward strategically positioning itself to attract new businesses, investment, and talent. These elements are key for building a knowledge and service-based economy given the changes in traditional industrial sectors.

The tables in this section provide a baseline set of data on Detroit's workforce, economy, and human capital. One of the issues that arose from the analysis was that Detroit has many young working age residents who are unemployed and may be under-skilled for jobs in the city. The unemployment rate for 16-24-year-olds is 55 percent, which is troubling as this considers individuals who are actively in the workforce and not in school. One of the identified problems is that nearly 24 percent of young workers did not finish high school and do not have a high school diploma or GED. Given the changing nature of employment in the city and across the United States, many young people are at risk of being left behind economically unless educational attainment levels improve and/or skills trainings are available to better prepare workers for jobs of the future.

Low levels of educational attainment translate directly into lower earning potential. Based on data provided by HUD, Detroit high school graduates earn only 57 percent of what bachelor's degree holders earn, while those with some college or associate degrees earn about 65 percent of bachelor's degree holders. The current changes to Detroit's existing industries such as automotive and manufacturing, require workers to have higher levels of education, technical skills, and the ability to adapt to technological change. Investment in human capital is necessary to ensure everyone in Detroit has an opportunity to be gainfully employed.

The analysis presents a snapshot of Detroit's demographics and economics, and other sections of the Consolidated Plan provide greater detail regarding how these elements influence the concentration and distribution of lower-income households across the city.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	201	146	0	0	0
Arts, Entertainment, Accommodations	24,059	27,393	14	13	-1
Construction	3,139	4,930	2	2	0
Education and Health Care Services	34,379	48,468	20	23	3
Finance, Insurance, and Real Estate	7,919	14,693	5	7	2
Information	2,853	4,117	2	2	0
Manufacturing	19,263	24,208	11	11	0
Other Services	5,533	7,599	3	4	0

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Professional, Scientific, Management Services	18,144	41,293	11	20	9
Public Administration	0	0	0	0	0
Retail Trade	18,436	11,890	11	6	-5
Transportation and Warehousing	5,789	4,471	3	2	-1
Wholesale Trade	4,777	6,864	3	3	0
Total	144,492	196,072	--	--	--

Table 42 - Business Activity

Data Source: 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)
Source:

Labor Force

Total Population in the Civilian Labor Force	284,340
Civilian Employed Population 16 years and over	213,590
Unemployment Rate	24.88
Unemployment Rate for Ages 16-24	54.97
Unemployment Rate for Ages 25-65	13.41

Table 43 - Labor Force

Data Source: 2011-2015 ACS

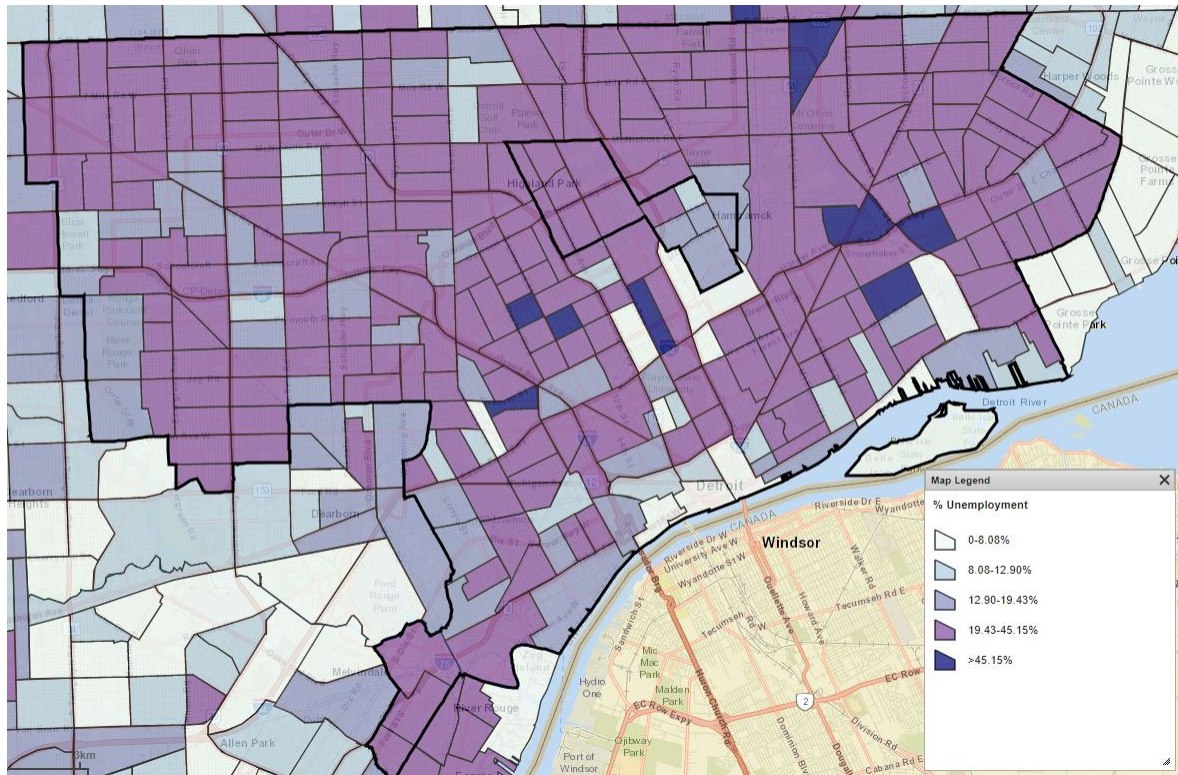
Occupations by Sector	Number of People
Management, business and financial	26,890
Farming, fisheries, and forestry occupations	9,795
Service	36,065
Sales and office	52,000
Construction, extraction, maintenance, and repair	12,345
Production, transportation, and material moving	17,255

Table 44 – Occupations by Sector

Data Source: 2011-2015 ACS

The unemployment rate in Detroit is 25 percent, and the map below presents the data across the city's census tracts. What can be observed is that across much of the city experiences unemployment rates of between 19 percent and 45 percent. High levels of unemployment correlate to a lack of local employment opportunities, skills mismatches, and a lack of education on the part of workers. High unemployment rates result in diminished purchasing power, and greater strain on the city's social services.

Map 10: Percent of Unemployed Population



Travel Time

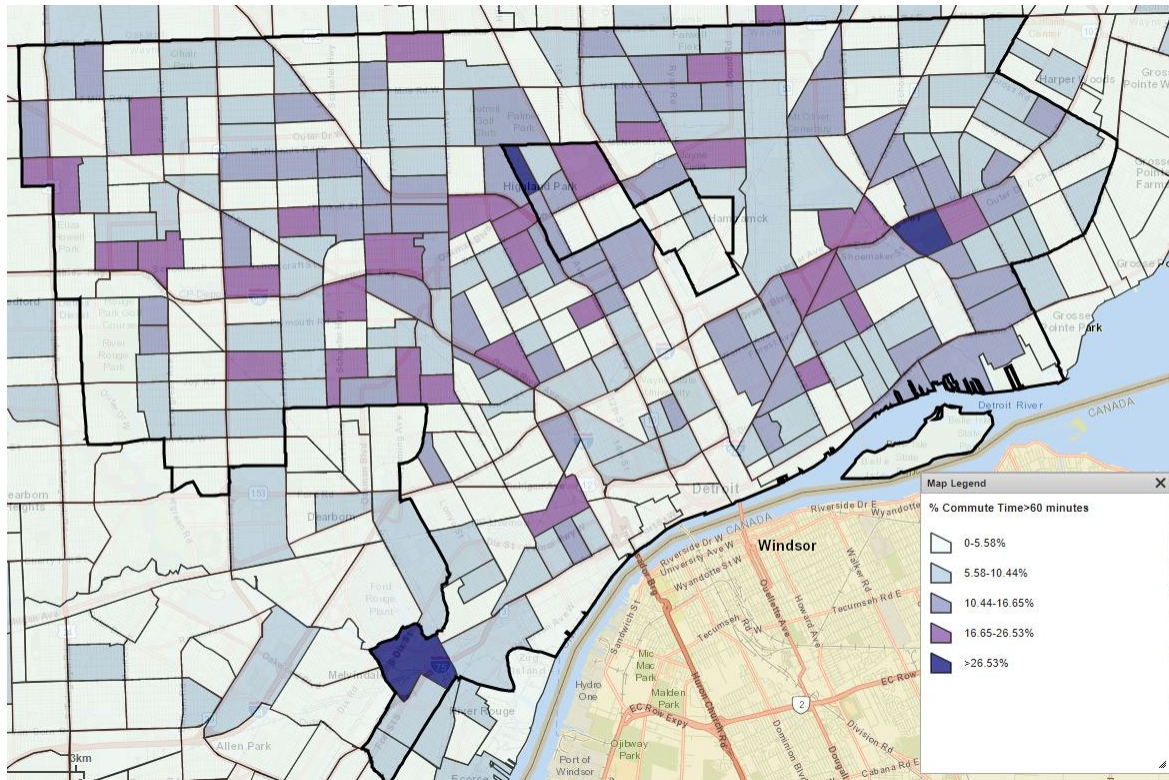
Travel Time	Number	Percentage
< 30 Minutes	125,340	62%
30-59 Minutes	59,375	30%
60 or More Minutes	16,125	8%
Total	200,840	100%

Table 45 - Travel Time

Data Source: 2011-2015 ACS

In Detroit, about 62 percent of workers have commutes of less than 30 minutes. This finding makes sense because many of Detroit's surrounding communities are large employment centers. Communities such as Dearborn and Livonia have large manufacturing firms which have an employment catchment area covering Detroit. The map below presents commute data by census tract for Detroit. What can be observed is that persons living outside the urban core of the city tend to have longer commute times. This potentially shows the mismatch in skills between workers and jobs found locally.

Map 11: Percent Commute Time Less Than 60 Minutes



Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	21,690	9,945	38,020
High school graduate (includes equivalency)	50,705	17,670	44,755
Some college or associate degree	66,755	15,475	36,385
Bachelor's degree or higher	34,070	3,665	9,385

Table 46 - Educational Attainment by Employment Status

Data Source: 2011-2015 ACS

Educational Attainment by Age

	Age				
	18-24 yrs.	25-34 yrs.	35-44 yrs.	45-65 yrs.	65+ yrs.
Less than 9th grade	1,795	3,950	4,795	9,045	9,365
9th to 12th grade, no diploma	17,475	13,780	12,525	25,555	15,375

	Age				
	18–24 yrs.	25–34 yrs.	35–44 yrs.	45–65 yrs.	65+ yrs.
High school graduate, GED, or alternative	27,155	27,510	28,255	57,360	28,280
Some college, no degree	29,680	25,395	23,075	46,245	16,980
Associate degree	1,865	4,595	5,545	13,770	4,495
Bachelor's degree	3,205	8,850	6,075	14,405	5,530
Graduate or professional degree	295	3,980	3,910	9,930	5,785

Table 47 - Educational Attainment by Age

Data Source: 2011-2015 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	16,381
High school graduate (includes equivalency)	20,932
Some college or associate degree	24,167
Bachelor's degree	36,996
Graduate or professional degree	48,983

Table 48 – Median Earnings in the Past 12 Months

Data Source: 2011-2015 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The major employment sectors of Detroit's economy are Educational and Health Care Services (24 percent); Arts, Entertainment, and Accommodation (17 percent); Manufacturing (13 percent); Professional, Scientific, Management Services (13 percent); and Retail Trade (13 percent). These five sectors employ about 79 percent of all the workers. Major employers by sector include:

- Health Care and Social Assistance
 - Henry Ford Health System
 - Detroit Medical Center
- Arts, Entertainment, and Accommodation
 - Illitch Companies
- Manufacturing
 - General Motors
 - Fiat Chrysler Automobiles
- Professional, Scientific, Management Services
 - Quicken Loans
 - Microsoft
- Retail Trade
 - Meijer
 - Little Caesars

Detroit residents tend to live near their work with 62 percent of workers traveling less than 30 minutes to their place of work. Based on data from the U.S. Census, only 29 percent of Detroit residents live and work in the city. This shows that the city imports workers from surrounding communities and that these workers have the skills and training to be competitive in Detroit's labor market. A challenge is to develop the skills of Detroit residents so that they can work locally within the city.

Describe the workforce and infrastructure needs of the business community:

Detroit's business community seeks an educated, well-trained, technically skilled, and professional workforce which can help the city compete for companies and jobs in the Educational and Health Care Services, Manufacturing, and Professional, Scientific, and Management Services sectors. Worker training is critical for younger residents that face a significant school drop-out rate and an unemployment rate of 55 percent for 16-24-year old persons. Specific workforce needs include:

- Training in technology, advanced manufacturing, skilled-trades, computer science, finance, advanced medical/healthcare skills, and customer service.
- Education credentials beyond a high school diploma, such as bachelor and master's degrees.
- Basic proficiency in mathematics for positions in advanced manufacturing.
- Basic and advanced proficiency in computer technology.
- Soft skills such as leadership, teamwork, and communication skills.
- Employees being able to pass drug screenings for manufacturing jobs.

Transportation systems connect residents to each other as well as to employment, retail, and other service centers. The City of Detroit was built for the automobile, and many employment centers are located further away from where residents tend to live and are not connected to public transit. This results in difficulty for low-income residents who may not have access to a personal automobile. Detroit has two bus systems, the Detroit Department of Transportation (DDOT), serving the City of Detroit, and the Suburban Mobility Authority for Regional Transportation (SMART) serving the surrounding suburbs. The routes of the bus systems are limited and makes it difficult for low-skilled residents, who may not have access to a car, to get to jobs in the suburbs or in parts of the city which are not connected to public transit.

In addition to the bus service, the city also has limited rail service in both Downtown and Midtown. The Detroit People Mover (DPM) is a nearly three-mile automated people mover system which operates on a single track encircling the downtown. The system was built in the 1980's and ridership has tended to remain quite low. More recently the Qline streetcar, which is a light rail system, was built in May of 2017 and connects Downtown with Midtown. The route is about three miles long and follows Woodward Avenue where in recent years significant housing and commercial development has taken place.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

The following projects will have an economic impact on the city over the next few years¹¹:

- *Gordie Howe International Bridge*
 - The bridge, named after Canadian-born, Detroit Red Wings legend Gordie Howe, will be 1.6 miles long and connect the City of Detroit with Canada, and will cost an estimated \$5.7 billion. The international crossing will also have bike and pedestrian lanes. Construction on the American side officially broke ground in July 2018 and is expected to be completed by 2024.
- *Motown Museum expansion*
 - The Motown Museum announced in 2016 that it would be embarking on a \$50 million expansion, by creating a 50,000 square foot complex with interactive exhibits, a new theater, recording studios, and expanded meeting and retail space. In September 2019, ground was broken on the first phase of construction—the renovation of three homes facing West Grand Boulevard is expected to be completed in summer 2020.
- *Michigan Central Station*
 - Ford Motor Company will build a campus for mobility in Corktown at an estimated cost of \$740 million. The broader project will include the old DPS Book Depository, renovated into offices, retail, and residential, and the Michigan Central Station. The project would result in an infusion of 5,000 workers, and the development of office and retail space.
- *The Mid*
 - Announced in March 2019, The Mid will be the biggest development in Detroit north of Mack Avenue since the 1920s. Initial plans call for a 25-story, 228-room hotel with luxury condos making up the top nine floors; a 30-story mixed-use, multi-family development with 250 apartments and first-floor retail; and a 12-story building with “co-living” spaces. The \$377 million project is slated to be completed by the end of 2020. After receiving \$58 million in tax incentives and negotiating a community benefits agreement, the project is expected to break ground soon.
- *Hudson’s site*
 - The new Hudson’s will total approximately 1,000,000 square feet (not including underground parking for 700 cars), with 330 residential units and 240,000 square feet of office space at a cost of over \$900 million. The estimated completion date is scheduled for 2023.
- *The Monroe Blocks*
 - Covering the area between Campus Martius and Randolph along Monroe, the project as initially announced would add a 35-story office tower plus residential at a cost of \$830 million. Ground broke on December 2018, but there has been little work at the site since. It is currently undergoing a redesign.
- *Detroit Center for Innovation*
 - The University of Michigan intends to build a campus focusing on high-tech research and education. The center is expected to cost around \$300 million with construction beginning in 2021.
- *Fiat Chrysler Plant*

¹¹ <https://detroit.curbed.com/maps/biggest-developments-in-detroit-transform>

- Fiat Chrysler Automobiles is expected to invest heavily in the Connor Creek Industrial Center. The automobile company will spend \$1.6 billion converting its Mack Avenue Engine Complex to produce next generation Jeeps, and \$900 million to retool the Jefferson North Assembly Plant. It estimates that these upgrades will bring 5,000 new jobs to Detroit.

Based on the employment and investment being created by the private market, Detroit's workforce needs to be ready to seize the opportunities available. The City needs to invest in programs which assist individuals in gaining marketable skills to prepare them for the job market. The following could be done to increase the competitiveness of city residents:

- Increased investment in public education
 - Increase high school graduation rates
 - Increase the number of individuals attaining post-secondary training
- Creation of pathways programs from school to work.
 - Improve the development of basic skills both technical and non-technical
 - Improve computer skills of unemployed and under-employed residents
 - Provide mentorship to individuals looking for work
- Improvements and expansion of public transportation services
 - Enhanced bus service
 - Alternative mobility options
- Investment in worker housing
 - Creation of affordable housing close to employment nodes

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

The decline of manufacturing jobs has played a major role in Detroit's population decline from a peak of almost two million residents in the 1950's. The region's economic success depends on Detroit's ability to foster and create a qualified workforce which attracts employers. The predominate industries in the city include Health Care and Social Assistance; Arts and Entertainment; Manufacturing; and Professional and Technical Services. The City has programs available to help improve individual's capabilities around basic skills, technical training, and educational credentialing.

The importance of education cannot be understated, as workers with low levels of education will continue to be left behind by Detroit's increasingly competitive and changing job market. One such group are individuals without a high school diploma and is reflected in their ability to earn an income. The median earnings for this group are \$16,381 per year. Comparatively, as educational levels increase incomes tend to rise. Based on data provided by HUD, Detroit high school graduates earn only 57 percent of what bachelor's degree holders earn, while those with some college or associate degrees earn about 65 percent of bachelor's degree holders. Of the currently employed civilian population, only 20 percent have bachelor's degrees or greater. This shows that secondary education, which tends to be a minimum qualification for many corporate roles, is lacking. Of the civilian employed population, 13 percent have less than a high school degree or less. Without further training, the population over time will lack critical skills necessary to earn higher incomes in a changing economic environment, especially as greater levels of automation take place.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

The following programs and services will support the City of Detroit's Consolidated Plan. Detroit at Work is a free job training program started by the Mayor in 2018 and has the goal of getting more than 40,000 city residents back to work within five years, particularly younger residents.¹² The program focuses on sectors such as:

- Healthcare
- Information Technology
- Manufacturing
- Construction and Transportation
- Retail, Hospitality, and Entertainment

The Detroit Employment Solutions Corporation continues to provide job placement and training services to 10,000 job seekers and 2,000 businesses annually. The State of Michigan has many colleges and universities that fill the need for ongoing training and education. The City of Detroit also has many non-profits, such as Focus: HOPE, that offer job training programs.

Southwest Solutions offers a variety of workforce development programs to help individuals acquire the education, skills, training, and job opportunities to secure sustainable employment. These programs are designed to address the needs and barriers of the individuals seeking work and greater economic security and success. Some programs include:

- Adult Literacy
 - Adult Learning Lab in southwest Detroit helps adults improve their literacy, math, and computer skills so they can be better qualified for employment. These services are free for eligible participants.
- Center for Working Families
 - Helps low-income families reach financial stability, access income support, develop educational and employment opportunities, build wealth, and move up the economic ladder. Participants are assisted by a financial coach, workforce development coach and benefits coach.
- Earn + Learn
 - Innovative and comprehensive model of workforce development that has helped more than 1,000 jobless individuals in the Detroit area participate in training opportunities.
- PATH (Partnership. Accountability. Training. Hope.)
 - Assists welfare applicants and recipients to become self-sufficient and integrated into the labor force, based on the workforce needs of Michigan's current and emerging economy.
- Supported Employment
 - Designed to help people with severe and persistent mental illness find work at employment opportunities that they choose and for which they are qualified.

¹² <https://detroitatwork.com/>

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

Yes

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

Some active neighborhood plans being created in the East Design Region include the Jefferson Chalmers Neighborhood Framework Plan, the Islandview Greater Villages Planning Strategy, and the Campau-Davison-Banglatown Plan. Regarding the Central Design Region, plans include Greektown, Greater Corktown, and Eastern Market. The goal of the plans is to achieve neighborhood stabilization and revitalization and supporting the growth of population and jobs. Some specific goals include housing rehabilitation, development of community assets and open space, and economic development. Each plan presents strategies and recommendations along with implementation framework communities can adopt. These plans in concert with the Consolidated Plan can help Detroit pivot toward a brighter future.

Discussion

See above.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

The distribution of low- and moderate-income households aligns with areas challenged by different housing problems. According to the Needs Assessment low income renters and owners have the greatest number of housing problems. The attached low/moderate income map shows census tracts with concentrations of low/moderate income people (census tracts with 51 percent or more low- and moderate-income people are concentrated areas). Low- and moderate-income concentrations comprise most census tracts in the City of Detroit. Concentration is defined as a close gathering or clustering of people or things.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

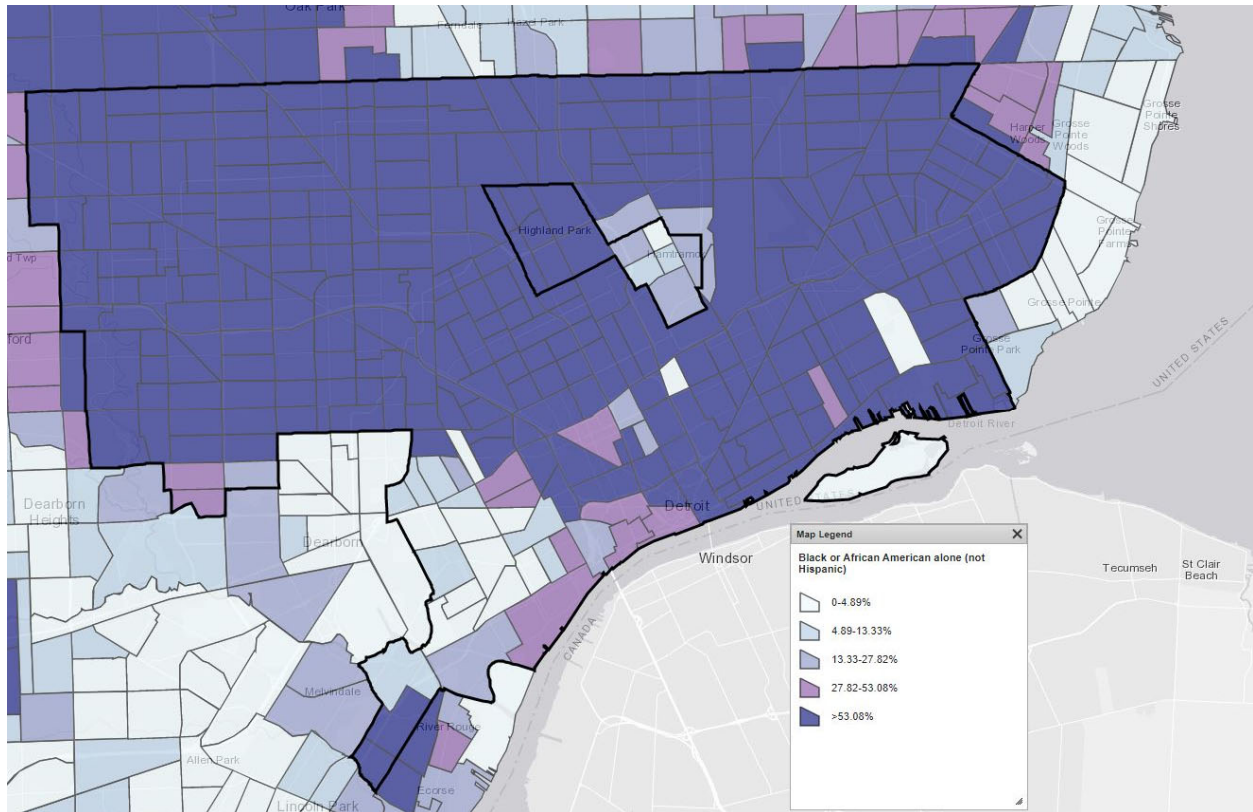
Minority Concentration - A close gathering or clustering of populations which are designated as minorities which historically are Non-White residents.

Low-income Concentration - A close gathering or clustering of populations which have incomes below 80% of the area median income.

The maps presented in this section illustrate the racial and ethnic concentrations found in the City of Detroit.

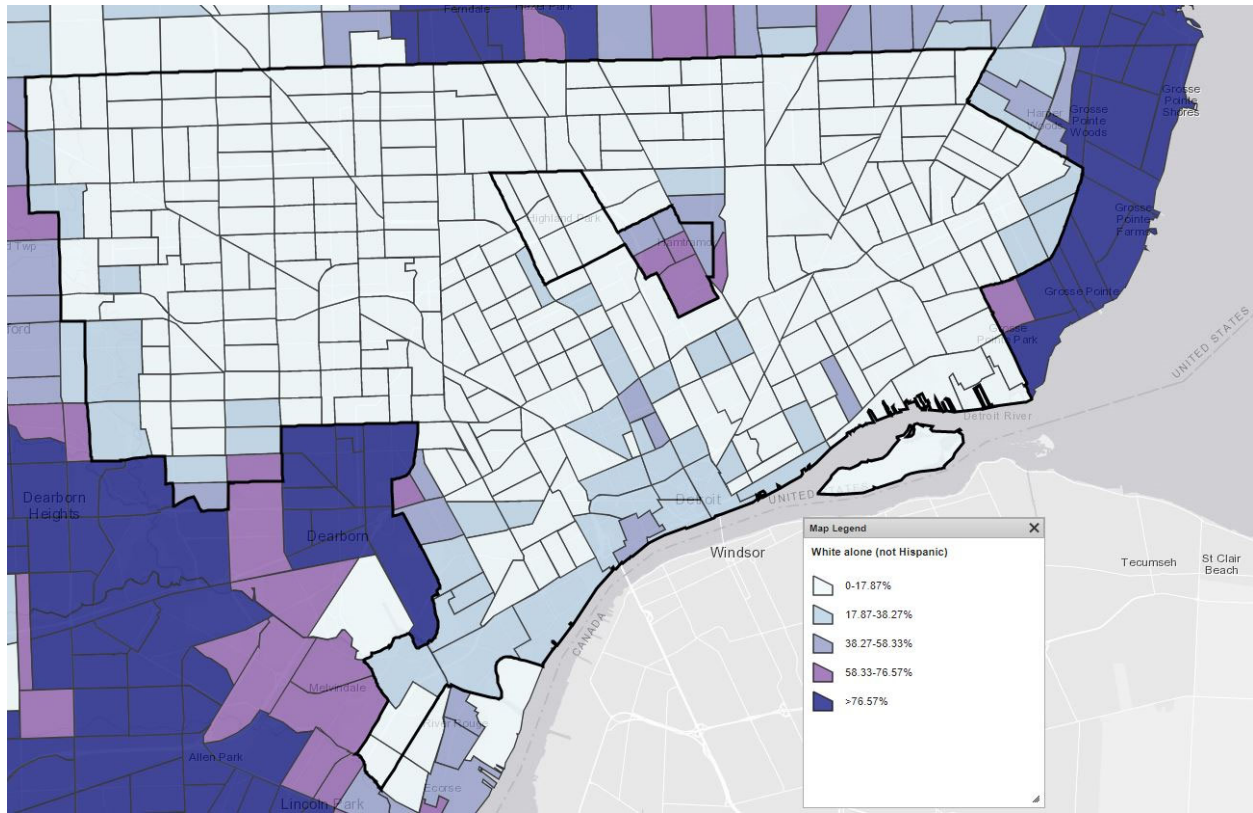
Black/African Americans comprise over 82 percent of Detroit's population and are located throughout the City of Detroit. Based on data provided by HUD, almost the entirety of the city has a concentration Black/African American population of greater than 53 percent. The area where Black/African American are not concentrated is the southwest of the city, which is an area with a long-standing Hispanic population.

Map 12: Percent Black or African American



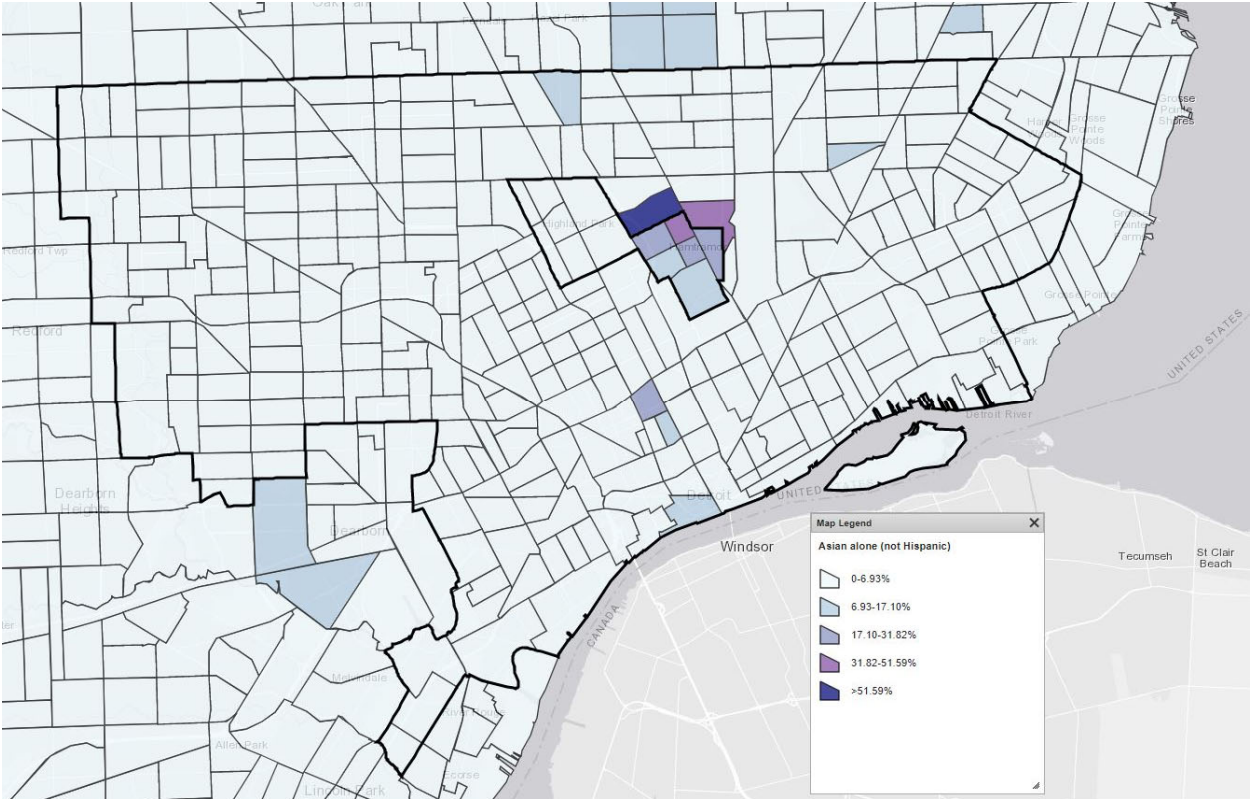
The concentration of White population in Detroit is generally found on the periphery of the city. Neighborhoods with the greatest percent concentration include Midtown, Downtown, and areas along the riverfront. Across the city the highest concentration of Whites is 77 percent and found near Hamtramck, a historically Polish community.

Map 13: Percent White



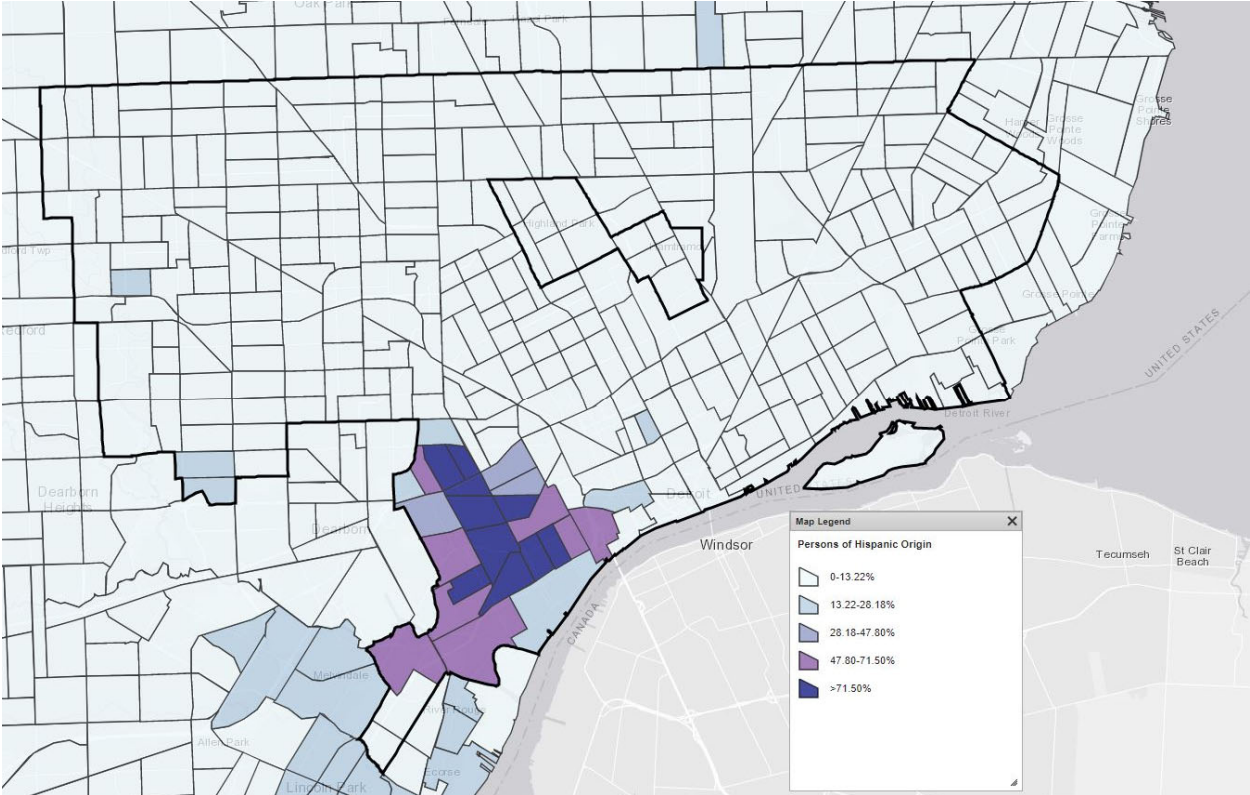
The Asian population in Detroit is generally found near Hamtramck, a historically Polish community, which in recent times has seen an increase in Arab and South Asian population. During the 1970's the Hmong population initially settled in the area and subsequent waves of immigration has resulted in an increased population. The highest concentration of Asians is 52 percent and found in a Census Tract just north of Hamtramck.

Map 14: Percent Asian



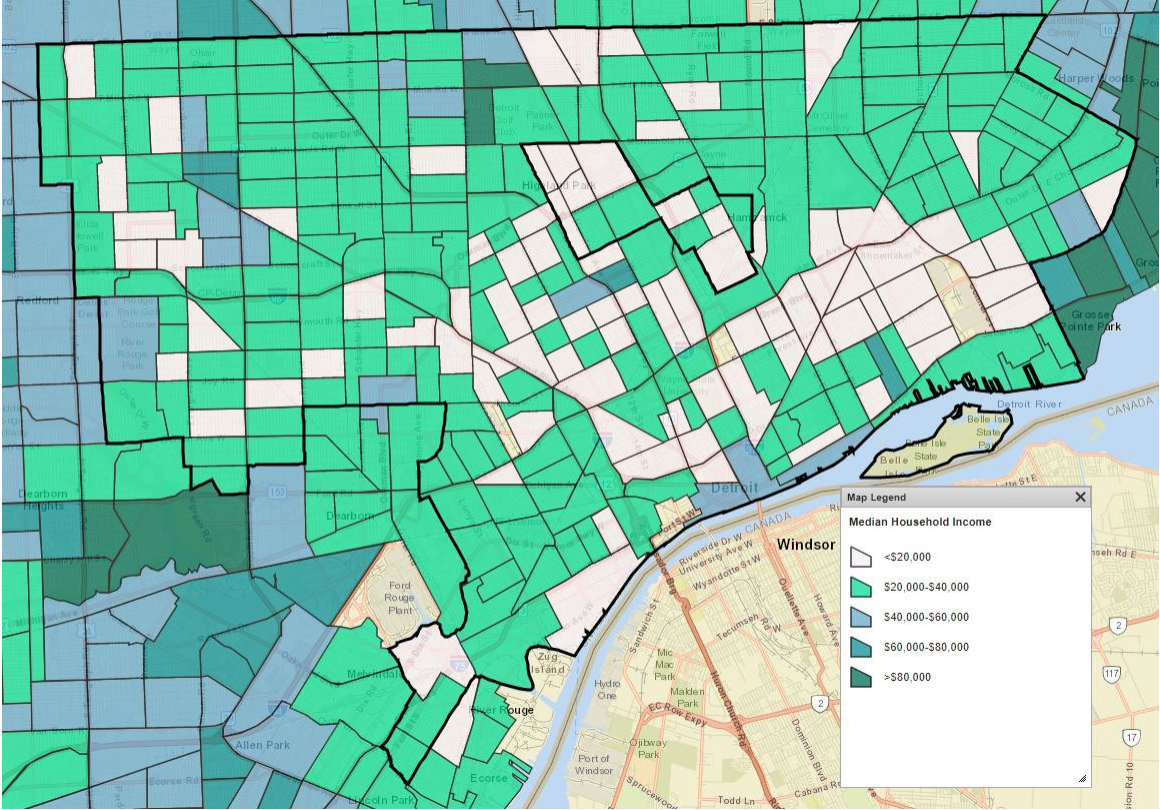
The Hispanic population in Detroit is generally found in the southwest corner of the city. The neighborhood, Mexicantown has the highest concentration of Hispanics at 72 percent. This is a historically Hispanic area, as Latino households have been settling here for nearly 100 years.

Map 15: Percent Hispanic



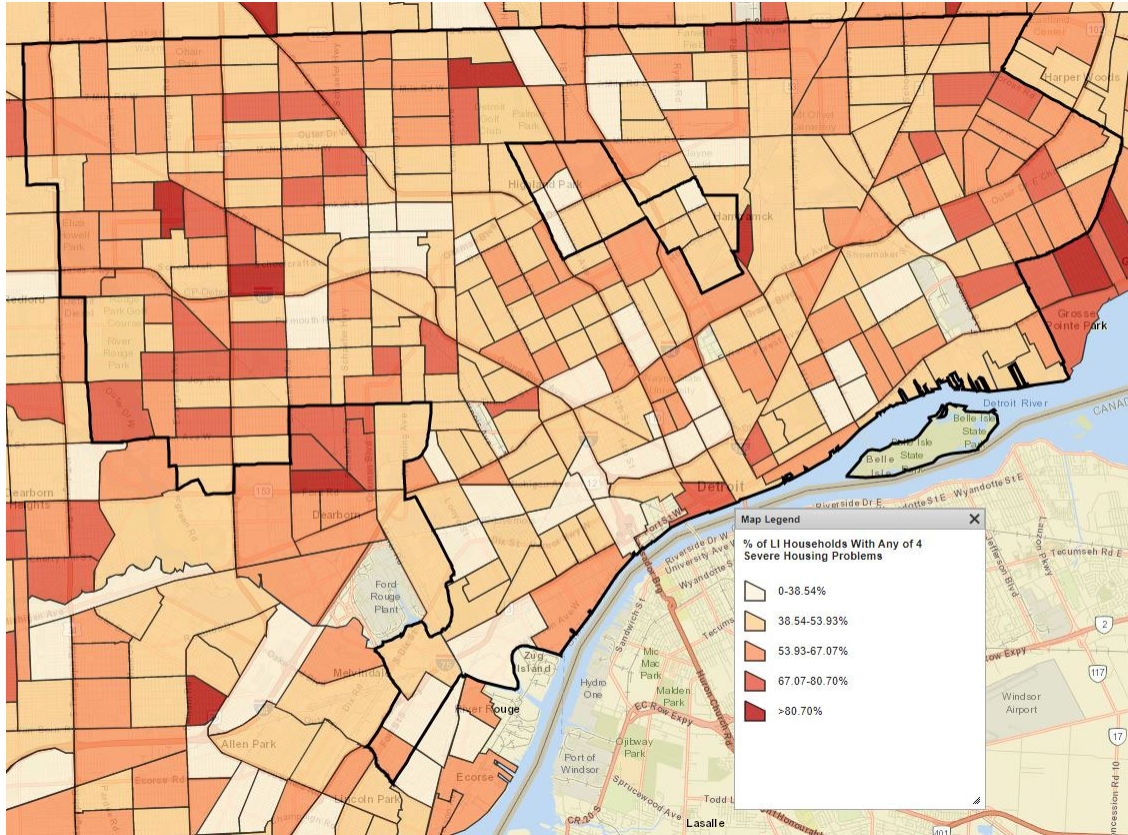
The map below presents households by income. What can be observed is the concentration of low-income households throughout the city, particularly in the urban core and eastern portion of the city.

Map 16: Median Household Income



The map below shows the locations where low-income households with multiple housing problems are concentrated. What can be observed is the concentration of low-income households with housing problems ranges between 38 percent and 68 percent of all low-income households across census tracts. There are some concentrations of greater than 68 percent, but these are fewer in number.

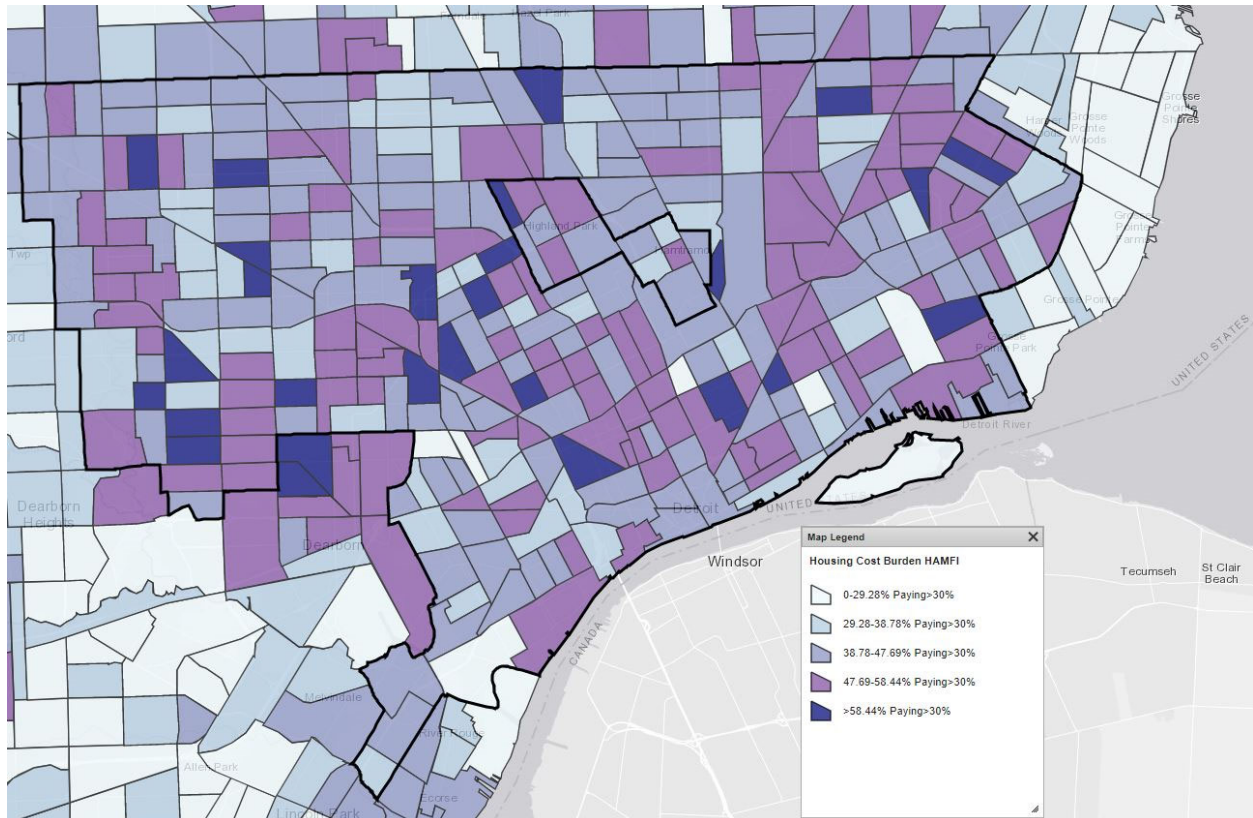
Map 17: Percent of Low-Income Households with Housing Problems



What are the characteristics of the market in these areas/neighborhoods?

The housing market across the city is dominated by generally low-income households with limited purchasing power. A key issue that was identified in the Needs Assessment was that about 45 percent of all households in Detroit are experiencing cost burdening which limits their housing choices. Additionally, the existing housing stock is older and, in many cases, need of significant upgrades. Map 5 presents cost burdening across the city.

Map 18: Percent Housing Cost Burdened



Are there any community assets in these areas/neighborhoods?

Despite neighborhood changes, Detroit has continued to maintain or develop significant community assets within each district. Each district has strong community organizations, recreation centers, schools, and retail stores. District assets are identified below:

- District 3:
 - City Airport
 - Gateway Market Place Shopping
 - Conant Gardens
 - Bel Air Movie Theater (City of Detroit's only neighborhood movie theater)
 - Joe Randazzo's (fresh fruit market)
- District 5:

- Belle Isle
- GM Center
- Quicken loans headquarters
- Eastern Market (farmer's market and shops)
- Greektown Casino
- Ford Field
- Comerica Park
- People Mover
- Indian Village Historic Homes
- College of Creative Studies
- District 6
 - Mexican Town
 - Wayne State University
 - Detroit Institute of Arts (museums and Detroit Symphony Orchestra)
 - TechTown Detroit
 - Qline.

Are there other strategic opportunities in any of these areas?

The Detroit Planning and Development Department (PDD) is leading planning in neighborhoods across the city. The approach is guided by PDD's mission: a healthy and beautiful Detroit, built on inclusionary growth, economic opportunity, and an atmosphere of trust. The PDD plans include the East Design Region, Central Design Region, and West Design Region. The East Design Region serves Council Districts 3 and 4, the Central Design region serves Council Districts 5 and 6, and the West Design Region serves Council Districts 1, 2, and 7. The goal of the plans are to achieve neighborhood stabilization and revitalization and supporting the growth of population and jobs.

Some active neighborhood plans being created in the East Design Region include the Jefferson Chalmers Neighborhood Framework Plan, the Islandview Greater Villages Planning Strategy, and the Campau-Davison-Banglatown Plan. Regarding the Central Design Region, plans include Greektown, Greater Corktown, and Eastern Market. Each plan can adopt an implementation framework community which helps improve conditions.

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Broadband Requirements

On January 17, 2017, HUD published the Broadband requirements for all Consolidated Plans submitted after January 1, 2018. This rule amends HUD's Consolidated Plan regulations to require that local jurisdictions, such as the City of Detroit, consider the concept of broadband access as part of consolidated planning efforts. A critical component of the broadband analysis is to address the need for access for low and moderate-income residents in the communities they serve.

Specifically, the rule requires that states and localities that submit a Consolidated Plan describe the broadband access in housing occupied by low- and moderate-income households. If low income residents in the communities do not have such access, states and jurisdictions must consider providing broadband access to these residents in their decisions on how to invest HUD funds. HUD defines the term of "broadband" as high-speed, always-on connection to the Internet or also referred to as high-speed broadband or high-speed internet.

To comply with HUD's broadband requirements, the City has incorporated actions into the consolidated plan process:

- Included a description of broadband needs in the housing market analysis.
- Consulted with the following entities that are engaged in narrowing the digital divide through meetings and internet research:
- City of Detroit's Director of Digital Inclusion - While not specifically connected to the Consolidated Planning process, the City recently hired its first full time Director of Digital Inclusion, whose mission is assisting the City in addressing digital inequities and expanding internet access for all residents. The City of Detroit has developed Connect 313, an access to technology building strategy. The chronic 313 fund was formed in 2022 coordinate and support city wide digital inclusion efforts with a data-driven, community-based philosophy. \$23 million was raised for the Detroit public school system to provide a computer donation, Internet access, and technical support framework. The city is using a community governance structure him to carry out program is partnering with community-based organizations and social enterprises. Human IT group has been engaged to create 100 jobs with 30 to date. Advocacy and community support as well as community participation is a key part of the city' strategy. The city created five different committees with 13 members each that provide input from the community. Apple is also working with the city to create digital empowerment through the development of a Developer Academy where residents can create their own applications and benefit from royalties. They also will receive MacBook computers.
- Data Driven Detroit (D3) – D3 is a low profit 3C organization that is mission driven. It contracts with community-based organizations and groups to provide accessibility to data by collecting data and organizing it in the areas of housing, neighborhoods, workforce, and accessibility at low cost or no cost. D3 serves as a central repository and address level database to facilitate community

development. The organization also works with the city and the Detroit community technology project on 2020 Census outreach and provides training to community residents and auxiliary organizations to increase Digital inclusion. D3 uses two strategic approaches, 1) training and capacity building upscale and 2) system setup, staff training to connect to data. They are for data University which is a six-course cohort model of 30 persons in a workshop style including several topics such as participatory data. The goal is to do 16 of these workshops which has been delayed by the COVID – 19 pandemic.

- Detroit Community Technology Project – the project seeks to demystify technology and expand digital literacy in Detroit communities through two primary community technology programs: Data Justice Program and Equitable Internet Initiative. Using activities such as “hosting Data DiscoTechs in each district of Detroit to helping Digital Stewards and their neighbors design resilient communications infrastructure and Gigabit apps, we strive for a future where people who have been marginalized from political and economic power can use technology to shape the future of their lives, neighborhoods, and regions.”
- Several non-profit community-based organizations that are working with or receiving support the City and the above agencies to reduce the digital divide

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

Access and the Digital Divide

Access to computers that are connected to high-speed internet have become integral to how most Americans live their lives, receive information, and conduct business. As more and more information portals, service providers, and public resources transition to online platforms, digital inequities can surface with low income households often left feeling the impact of the digital divide. Disparate access to computers and high-speed internet can correlate with the inequality of household income, race, ethnicity, and educational attainment. The lack of high-speed internet can also be detrimental to economic development efforts in low income areas as it reduces capacity for residents to work from home, start home-based businesses, and develop entrepreneurial enterprises.

Based on the 2018 American Community Survey data from the U.S. Census, more than 25% of Detroit households have no internet access from home computers, laptops, and cell phones. Additionally, when the National Digital Inclusion Alliance ranked cities with over 50,000 residents using the 2017 ACS data, Detroit had the fourth highest rate of no Internet access. The national rate of no household Internet access is 12%. In Detroit, 19% of the households only had access to the Internet through their cellular data plans, creating what Michigan State University researchers last year called a troubling mobile only divide that may be holding Detroiters back on reliable Internet access and less productive Internet uses like homework or job searches.

In 2013, the US Census Bureau added a question to their annual American Community Survey (ACS) which asked residents about their access to computers and the internet. This question has helped federal partners measure the development of broadband/internet networks nationwide through point in time data and trends over time. These data points can also help pinpoint locations where federal and local partners may want to deploy resources to help bridge digital divides, particularly where they intersect with low income areas.

Computer and Internet Use in the City of Detroit

	2014		2015		2016		2017	
	Estimate	%	Estimate	%	Estimate	%	Estimate	%
Total	253,490	100.0%	255,580	100.0%	259,295	100.0%	264,360	100.0%
Has a Computer:	184,803	72.9%	190,995	74.7%	208,052	80.2%	219,803	83.1%
With Dial-Up Internet Subscription Alone	1,070	0.4%	996	0.4%	772	0.3%	342	0.1%
With a Broadband Internet Subscription	122,456	48.3%	123,591	48.4%	154,153	59.5%	174,188	65.9%
Without an Internet Subscription	61,277	24.2%	66,408	26.0%	53,127	20.5%	45,273	17.1%
No Computer	68,687	27.1%	64,585	25.3%	51,243	19.8%	44,557	16.9%

Source: American Community Survey, 2014-2017, U.S. Census Bureau. Table K202801

According to annual estimates through the ACS, from 2014-2017 the number of households in Detroit with broadband access increased 42 percent. As of 2017, nearly 66 percent of all Detroit households had access to broadband internet and 83 percent had access to a computer. Households without an internet subscription dropped 26 percent over the same four-year period.

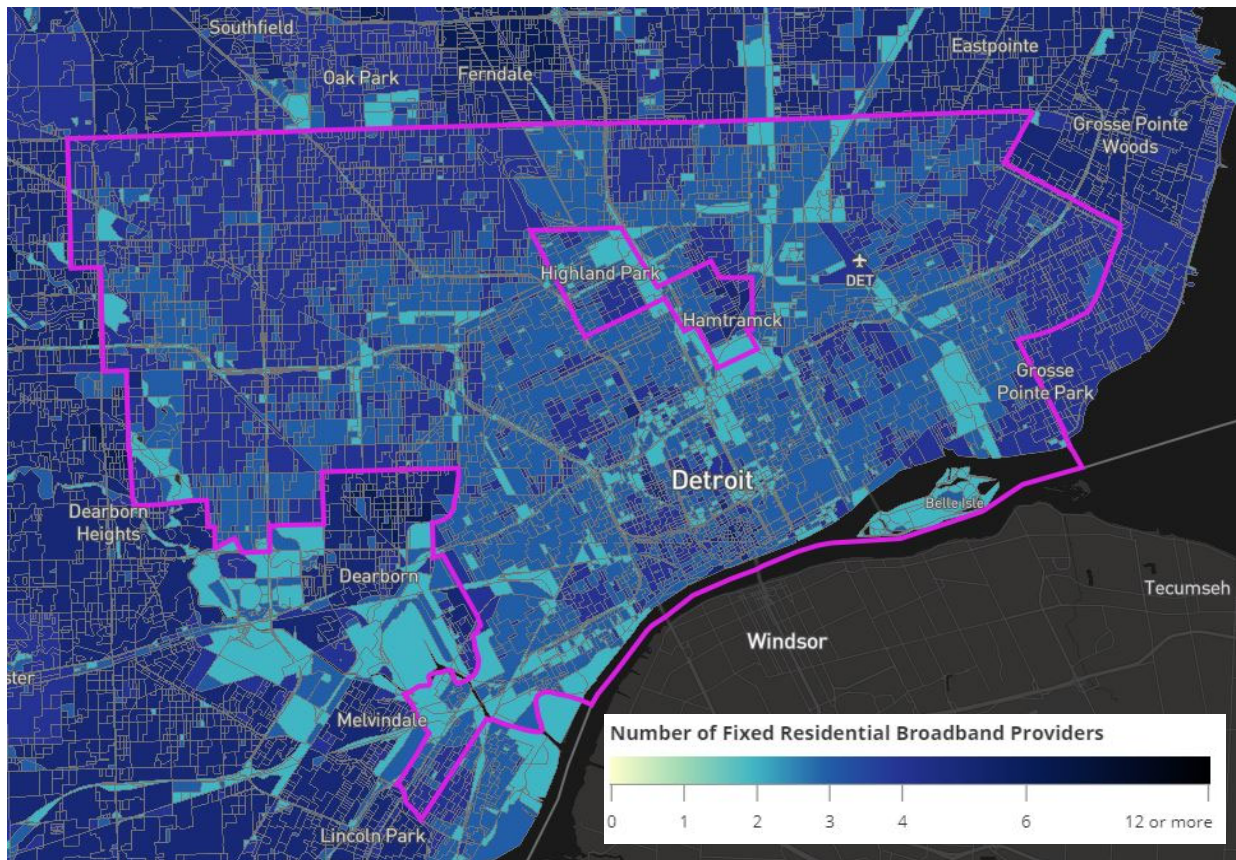
The Federal Communications Commission’s (FCC) Broadband Deployment data from December 2018 shows that 99.3 percent to Detroit’s population has access to at least three or more internet providers. Access to internet is higher in Detroit than the number of current household subscriptions, suggesting some digital divide which could be attributed to cost, skills/knowledge gap, reluctance to adopt new technology, or need for a connection. Detroit’s broadband coverage is just over 6 percent higher than the United States as a whole, and about 5 percent higher than the State of Michigan.

Since most of the single-family housing in the City of Detroit is older housing stock, the likelihood is that the infrastructure for access to broadband is not in place. The city has responded to this by promoting digital equity criteria in city-funded affordable housing developments to three additional bonus points for

Digital inclusion plan implementation. The community technology project is responding by developing community access network sites which boost the bandwidth. They provide Lifeline, an affordable Internet plan using a mesh network where residents pay based on their income. The challenge is to provide the service at scale for a reasonable price.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

The city's residential broadband internet access is mainly served by Comcast's Xfinity cable internet service. According to the FCC, the city has four other companies that provide service: AT&T and Earthlink provide DSL at 20 Mbps, and ViaSat and HughesNet provide satellite service. The city has established 20 stations to boost network access and is working with Internet service providers on lower costs.



Source: Federal Communications Commission, <https://broadbandmap.fcc.gov>

Although broadband coverage and service is available for nearly the entire city, many Detroit residents are not connected to broadband service either because of where they live or for financial reasons. To assist residents in meeting their needs for broadband access, some service providers have qualifying lower-cost broadband plans. For example, AT&T currently offers the "Access Program" which provides low-cost residential internet service to qualifying households that have at least one resident who

participates in U.S. SNAP and resides at an address within AT&T's service area. This program provides 3-5 Mbps internet service speeds at a cost of \$10 per month.

Comcast offers the Internet Essentials program which qualifying low-income households can access 15 Mbps service for \$9.95/month plus tax. There is a 2mb download limit per month for this program. Households can fill out an application online and must provide documentation to show they are a household in need. Internet Essentials also offers other programs such as low-cost computer purchases and free instructional classes. Since the pandemic, Comcast increased its bandwidth to 50 Mbps for greater access and speed than other internet service providers at the same price.

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

Detroit is vulnerable to a variety of natural, technological, and human-related hazards. Periodic disasters result from floods, tornadoes, winter storms, severe thunderstorms, and other events, causing injuries and loss of life, disruption of services, economic impacts, and significant property damage. Such events often have negative impacts on the affected communities long after the recovery has been completed.

According to a 2014 report completed by the University of Michigan, the City of Detroit will face many of the same changes in climate as the surrounding geographic area, but the city's specific vulnerabilities will be determined primarily by other factors. Land use, preexisting infrastructure design, and socioeconomic capacity are among many characteristics that will either reveal strengths or pose obstacles in adapting to climate change. There are many potential impacts of climate change that cut across many sectors and jurisdictions.

Detroit is expected to face the following critical challenges associated with climate change in the coming decades:

- Increased probability of heat waves and hot days, increasing the risk of heat-related illnesses.
- As severe rainstorms become more frequent and more intense, flooding will increase the risk of sewage overflows and water contamination.
- Infrastructure will face challenges, such as direct damage due to weather and increasing demands for services during heat waves or increased storm activity.

The City of Detroit's Homeland Security & Emergency Management (DHSEM) coordinates with local, regional, state, federal, and private-sector agencies to protect the community from natural and human-made emergencies and disasters.

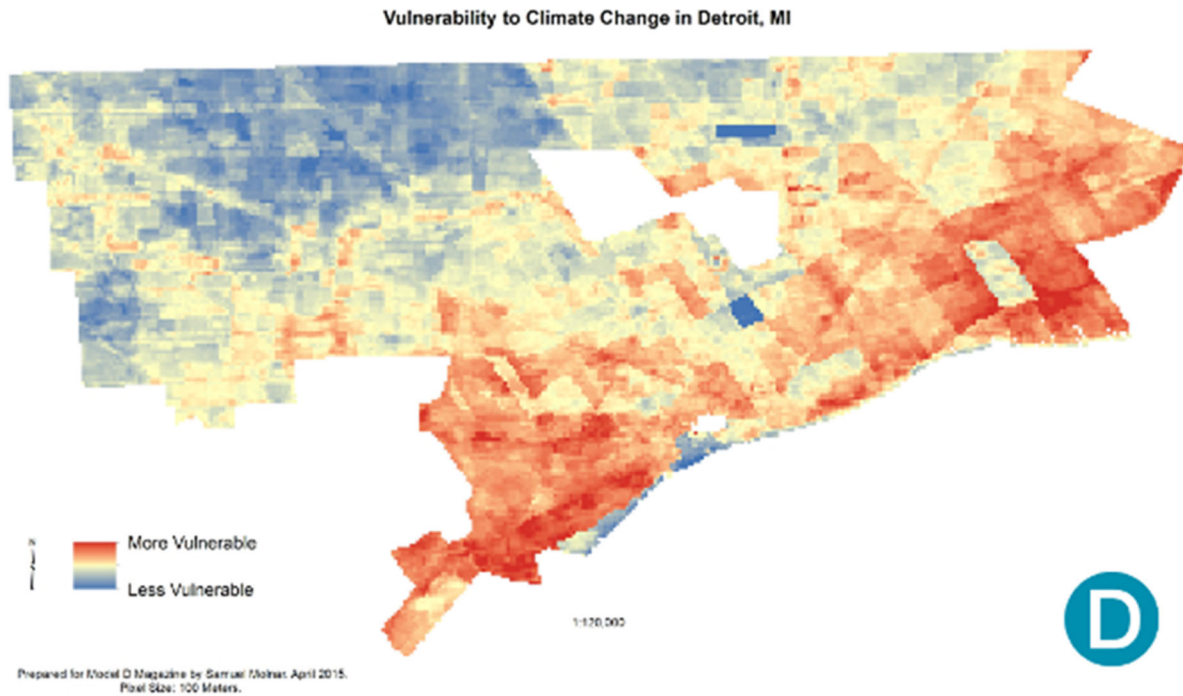
DHSEM focuses on the five mission areas – prevention, protection, mitigation, response, and recovery by preparing comprehensive emergency response plans. These include the Citywide Evacuation and Mass Sheltering Plan, Hazard Mitigation Plan, and Adverse Weather Response Team Plan. DHSEM is also responsible for a wide range of critical emergency management activities.

According to the Union of Concerned Scientists, Michigan can expect [much hotter summers](#) and increases in rainfall by 25 percent by the end of the century. The impact on Detroit's aging stormwater systems could lead to flooded basements and streets and sewage overflows into the Detroit River and Lake Erie. An example of such occurrences was Toledo's [loss of drinking water](#) in the summer of 2014.

It is important in responding to climate change and planning for disasters that neighborhoods and housing that is most vulnerable such as in low-to-moderate income communities are included and given priority.

In the map below, produced in winter 2015, shows areas which are most vulnerable to climate change in Detroit. It uses a mixture of physical indicators such as temperature, housing stock, and flooding risk, along with social indicators like age, asthma rates, and neighborhood stability, to create an index of

climate change vulnerability. The most vulnerable areas are shown in red, while the least vulnerable are shown in blue.



The vulnerability of housing occupied by low- and moderate-income households to increased natural hazards associated with climate change based on data, findings, and methods used by the jurisdiction.

While low- and moderate-income residents are not necessarily disproportionately vulnerable to these risks, the overall community impacts of a disaster may have a much larger impact on these households. In Detroit, as in many other densely populated urban areas, the area’s most vulnerable to climate change are generally synonymous with concentrations of poverty and people of color. These areas have increased heat and temperatures during the summer, less tree cover and greater risk of flooding.

Generally, in the case of disruption stemming from a natural disaster such as a flood, residents most vulnerable are those that depend on hourly wage employment, including low-mod households, as they do not receive wages if they cannot work in the wake of a disaster. Small service-oriented businesses are also vulnerable as they are most impacted by potential closures and are the less likely than larger corporations to be able to weather a stoppage or shortage in cash flow. Low- and moderate- income households may also have more difficulty recovering from storm related housing damage and may require additional community resources and support, such as rehabilitation and home repair programs.

The City of Detroit released its Sustainability Action Agenda, through its Office of Sustainability, which includes 43 action items *“to address the city’s numerous sustainability issues and outlines ways to improve*

the health, environment, and resiliency of Detroit and its residents.” The Sustainability Action Agenda is divided into four buckets. Click on the links below.

1. Healthy, thriving people
2. Affordable, quality homes
3. Clean, connected neighborhoods
4. Equitable, green city

[Detroit releases Sustainability Action Agenda to address city’s sustainability issues - Curbed Detroit](#)

[Detroit-Sustainability-Action-Agenda-Web.pdf \(detroitmi.gov\)](#)

“A major goal of the agenda is to reduce landfill waste. Through an additional \$1 million in funding, the city already plans on expanding its recycling program by adding multifamily and commercial properties, launching a recycling education campaign, and providing recycling options in public places like parks.

The Office of Sustainability is small. To help with implementation, it created a Sustainability Advisory Commission made up of representatives of relevant community groups and organizations, as well as an Interdepartmental Working Group of city officials.”

As Detroit grows, we must ensure that all residents can afford efficient, quality homes free of hazardous materials. We must work to minimize the involuntary displacement of longtime Detroiters, who have been central to our city’s growth, and to maintain affordable housing options throughout the city. We can bolster existing affordability strategies by reducing utility costs and eliminating exposure to toxic materials in homes. Detroit residents will not only have affordable housing options, but also quality ones. As Detroit’s population decline slows and we enter a new phase of growth, demand is driving significant new construction, with over 2,000 new multifamily residential units completed in 2016 and 2017. Increased housing investment and demand places pressure on our existing affordable housing stock, Housing is key to building healthy and stable residents and communities. particularly in resource rich neighborhoods. This sharply increases rents and property values, which is problematic for many Detroiters. The following strategies will be used to address the vulnerability of housing occupied by low- and moderate-income households:

- Reduce the total costs of housing, including increased utility efficiency & affordability - improve access to utility efficiency programs
- Implement and expand upon the Blue-Ribbon Panel’s water affordability recommendations
- Establish affordable housing preservation goals for building owners receiving City incentives
- Increase access to information on existing affordable housing

Strategic Plan

SP-05 Overview

Strategic Plan Overview

Like many other jurisdictions, the City of Detroit is faced with several hard choices regarding the distribution of federal grant funds for needs that clearly outweigh the available funding. This strategic plan was developed using a community needs survey and analysis of demographic, housing, and non-housing data provided by HUD and local sources. Needs were prioritized using a rating of “High” and “Low” per HUD Consolidated Plan instructions and then ranked by level of importance. The often-anecdotal information from residents, agencies, and other stakeholders was used to verify the current needs seen in the demographic and housing data. This allows the City to allocate and leverage the federal resources in a manner that will help HRD and the City to meet its goals. The City must assist our most vulnerable populations with affordable housing, services for health and safety, and economic opportunities. Due to pervasive and widespread poverty, HRD will use both CDBG and ESG funding to meet the needs of the homeless and will use CDBG and HOME funds to produce and preserve affordable housing units. HOPWA funding will be used for housing and other programs for those persons with HIV/AIDS. To sustain vibrant and sustainable neighborhoods HRD will also fund various public service programs; a public facility rehabilitation and commercial rehabilitation program; and fund improvements to various City parks.

For its FY 2020-21 Annual Action Plan, the City anticipated receiving entitlement funding in the amount of \$35,285,455 in CDBG, \$ 7,269,293 in HOME, \$ 3,032,870 in ESG, and \$ 2,903,135 in HOPWA funds for a total of \$48,490,753. Using the FY 2020-2021 allocations, the City estimates receiving five times the HUD grants totaling \$242,453,765 over the new five-year Consolidated Plan period:

- CDBG - \$176,427,275
- HOME - \$ 36,346,465
- ESG - \$15,164,350
- HOPWA-\$14,515,675

HRD will invest funds in all areas of the City based on income eligibility but will help implement parts of its strategy using Neighborhood Revitalization Strategy Areas (NRSAs) and Slum and Blight Areas (SBAs). In 2014, the City of Detroit received HUD approval for the designation of five areas which has proven to be a very successful approach. NRSAs and SBAs allow the City to strategically focus CDBG and other federal resources and leverage other public and private capital to carry out comprehensive neighborhood stabilization in targeted geographic areas. The benefits of the NRSA are:

Job Creation/Retention on Low/Moderate Income Area Benefit: Job creation/retention activities undertaken through 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.

Aggregation of Housing Units: Housing units can be part of a single structure for the purposes applying the low-and moderate-income national objective criteria. If 51% or more of all the assisted units provide

an LMI benefit, all units are considered as meeting a national objective: therefore, allowing assistance to housing occupied by non-LMI households.

Aggregate Public Benefit Standard Exemption: Economic development activities carried out under the strategy may, at the grantee's option, be exempt from the aggregate public benefit standards, thus increasing a grantee's flexibility for program design as well as reducing its record keeping requirements.

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.

HRD will also use the Slum and Blight Designated Areas to address the problem of vacant or substandard housing. This Designation will aid in rehabilitating substandard housing. Funding priorities based on the community needs assessment and data analysis are to 1) expand housing affordability and local development capacity; 2) provide funding to prevent homelessness and provide adequate transitional and permanent housing for special populations; 3) maintain safe and affordable rental housing especially for the elderly; 4) facilitate healthy and attractive neighborhoods through code enforcement, re-use of vacant lots and crime reduction; 5) improve the quantity and/or quality of public facilities; 6) increase public services especially for youth and seniors; and 7) expand economic opportunities through job creation, access to employment, and small business/microenterprise assistance. The Detroit Housing Commission (DHC) is a high functioning public housing authority that owns public housing units and manages housing choice vouchers. The DHC self-developed and partnered with other developers to produce low-income housing tax credit funded projects. The DHC participates in the Rental Assistance Demonstration (RAD).

The City will act to reduce barriers to fair and affordable housing including lack of affordable housing and limited housing types, poor housing conditions, and NIMBYism (Not in My Backyard) through its certification to affirmatively further fair housing (AFFH). To carry out its certification, the City completed and submitted its most recent Analysis of Impediments to Fair Housing Choice (AI) to HUD on May 15, 2018 covering the period FY 2017-2024, identified impediments to fair housing choice, and developed an action plan and strategies to address them. The AI identified the following impediments to fair housing choice: lack of awareness of fair housing laws including filing a complaint; disparities in access to opportunity; lack of aggressive enforcement of housing and building codes; racial and economic segregation in neighborhoods; limited accessible housing especially for seniors; private investments in limited neighborhoods; inadequate fair housing enforcement and outreach; and lending discrimination.

The City works with the local CoC to address homeless needs and prevention. Homes constructed prior to 1978 for lead-based paint will be tested. CDBG funds to improve neighborhood conditions and quality of life will help to reduce poverty. The City will fund business assistance and job creation and reduce housing costs. The Department implements monitoring procedures for non-profits, other City departments, and contractors using risk assessments and technical assistance and updated policies with changes from the 2013 HOME Final Rule.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

Table 14 - Geographic Priority Areas

Target Area	Percentage of Funds
Citywide	79
Slum and blight areas	3
NRAs	18

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The Consolidated Plan regulations require the City to describe the geographic areas of the city in which it will direct assistance during the ensuing program year. Although it is not mandatory to establish locally designated target areas where efforts will be concentrated, HUD strongly encourages grantees to do so.

Neighborhood Revitalization Strategy Areas Renewal

The City is applying to HUD for the renewal of five areas as Neighborhood Strategy Areas (NRSAs) to focus its investment on neighborhoods that meet the NRSA criteria. The City received HUD approval of five NRSAs in 2014-2015 and successfully implemented the strategies. The City developed selection criteria and conducted a public consultation process to identify housing and economic development opportunities and leverage public and private sector investment for the new NRSAs. The map below represents the new NRSAs which were determined by at least 70% of the population must be low- and very low-income households, primarily residential, and all areas within the NRSA are contiguous.

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 NRSA plan provides greater flexibility and ease of use of CDBG funds and allows the City to serve a broader resident base and business owners that would not be eligible without the designation. The strategy comprises several interrelated initiatives:

- Housing Rehabilitation – zero interest loan and elderly emergency grant programs
- Job Creation and Business Assistance through small business loans
- Job Training and Placement
- Youth Employment Summer Jobs Program– Public Services

Slum and Blight Designation

Of particular concern is the problem of vacant or substandard homes that are contributing to the overall problem of blight and decay. The City will use the slum and blight area designation to address this problem as described at 570.208(b)(1). The slum and blight category covers activities that aid in the prevention or elimination of slums or blight in a designated area. The City will continue its blight reduction work citywide and in the three slum and blight areas that are contiguous with the NRSA as described above.

Map – 2020 NRSA

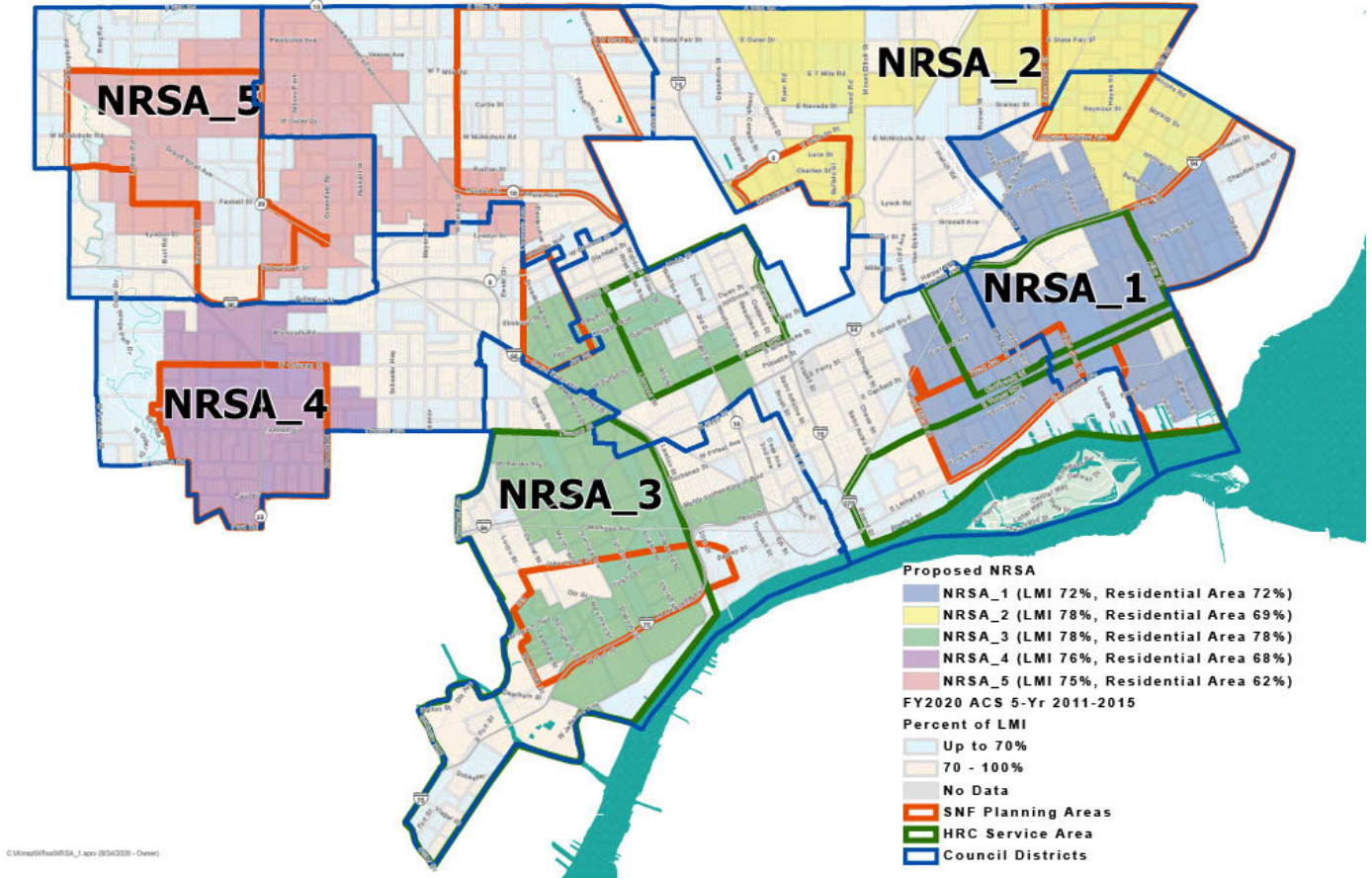


Table 50 - Geographic Priority Areas

1	Target Area Name:	NRSA Areas
	Target Area Type:	Strategy area
	Other Target Area Description:	
	HUD Approval Date:	To be determined by HUD approval date
	% of Low/ Mod:	70% of population is low- to moderate-income
	Identify the neighborhood boundaries for this target area.	There are five new NRSA areas based on 2015 ACS data. Please see attached map below.

<p>Include specific housing and commercial characteristics of this target area.</p>	<p>NRSA 1 - Located on the City’s Southeast side, NRSA 1 is bound on the East by Mt. Elliott Street, south by McNichol’s Rd., west by Cadieux Rd, and Gratiot Ave. near the north. While there is an increase in near-term and long-term investment, NRSA1 1 shares a 75 percent LMI rate. NRSA is the home to the FCA Mack Engine Plant, the Marina District and in addition, this NRSA makes up three (3) SNF neighborhoods, which include the Jefferson Chalmer neighborhood, East Warren/Cadieux, and Islandview/Greater Villages neighborhoods. Two (2) Housing Resource Centers are currently working within the NRSA 1 boundaries.</p> <p>The Jefferson Chalmers neighborhood – a national historic designation – is currently slated for significant redevelopment that includes commercial corridor improvements, single family, and multi-family revitalization improvements. Jefferson Chalmers has a strong presence of community block clubs and civic engagement.</p> <p>The East Warren/Cadieux area includes neighborhoods such as East English Village, West Village, and the Morningside neighborhood; the I-94 corridor runs just north of this area. While the Islandview/Greater Village is slated for park renovations, single family and duplex rehabilitation and streetscape improvements.</p> <p>NRSA 2 Located on the City’s Northeast side, NRSA 2 is bounded by 8 Mile Rd. to the north, Moross to the east, Edsel Ford Freeway to the southeast, I-75 Freeway to the west and Caniff St. to the south. 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</p> <p>NRSA 3 - Located in Southwest Detroit, NRSA 3 is bounded by Jefferson Ave. to the south, Springwells St. to the west, Elmhurst St. to the north and Woodward Avenue to the east. NRSA 3 contains several historic</p>
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	<p>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.</p> <p>NRSA 4 - Located in the southeastern part of Detroit, NRSA 4 is bounded by Jeffries Freeway to the north, Trinity St. to the west, Ford Rd. to the South and Hubbell St. to the east. 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.</p> <p>NRSA 5 - Located on the City's Northwest side, NRSA 5 is bound on the north by 8 Mile Road, on the west by Livernois Avenue, by the south on I-96 and the east near Livernois Avenue. 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.</p>
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<p>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</p>	<p>In conjunction with the Detroit Department of Neighborhood staff, HRD held two virtual public hearings and conducted online surveys to residents, businesses, non-profit organizations, landlords, to identify and prioritize housing and community development needs. The previous five 2015 approved NRSAs were used as a starting point in creating the 2020 NRSA's. A copy of map is attached.</p> <p>One non-profit focus group, and other community meetings were held.</p> <p>Additionally, consultations with managers and assistant managers from the Department of Neighborhood along with the HUD field office and private and public sector agencies through surveys were used to determine the new NRSAS.</p>
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<p>Identify the needs in this target area.</p>	<p>The five designated NRSA's in Detroit contain 49% of Detroit's population and have experienced population declines leading to an increase in vacancy and further disinvestment in the housing stock within each NRSA. In Detroit, about 72 percent of the population is classified as LMI, illustrating the economic and income challenges residents face. Households which qualify as LMI, may have difficulty finding and securing safe and affordable housing. Additionally, these households have limited disposable incomes for necessities.</p> <p>The five identified NRSA's have LMI populations greater than the city-wide figure of 72 percent, with NRSA's 3 and 4 having the largest percentage of LMI population at 78 percent. Even with the changes observed across the city over the last decade, the median household income in Detroit remains low. In 2015, median household income was \$29,841 which is nearly half the nationwide median. Aside from NRSA 2 and 5, the median incomes in the NRSA's are below the city-wide median</p> <p>The distribution of household incomes within each NRSA shows the degree to which households may be struggling, particularly those who are currently in housing priced higher than what they may be able to realistically afford. Across the five NRSA's, more than 25 percent of the households have incomes below \$15,000 per year. Between 40 and 45 percent of households are earning at or below the federal poverty line placing tremendous pressure on individuals and families to balance housing costs with other daily needs like healthcare, education, transportation, food security, and more.</p> <p>Across the city, unemployment varies with some city census tracts experiencing unemployment rates of between 19 percent and 45 percent.</p> <p>Within the City of Detroit, approximately 51 percent of all residents live in an owner-occupied housing unit compared to 49 percent of residents living in a renter-occupied unit.</p>
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	<p>Detroit's overall housing stock is older with 87 percent of all residential structures built prior to 1970. Nearly all the NRSAs mirror the Detroit's age of structure composition, with several exceeding the number of structures constructed prior to 1970. NRSA 2 and 5 have 94 and 92 percent of their structures built before 1970, respectively. Only 1 percent of all structures in the City were constructed after 2010, which is very similar across the NRSAs as well.</p> <p>In 2015, the median gross rent for a unit in Detroit was \$841 per month which was higher than the median for Wayne County (\$794). By comparison, median gross rent in the United States was \$928 per month. Three of the five NRSAs had median gross rents above the city average, while NRSAs 1 and 3 had lower rents.</p> <p>Overall, each NRSA tracks very closely to the City with one-third of residents having a high school diploma and another third having some college education. Between 9 and 12 percent of residents across the five NRSAs have earned a bachelor's degree or higher.</p>
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<p>What are the opportunities for improvement in this target area?</p>	<p>Based on the local data, Retail Trade and Service firms make up 74 percent of businesses found in the NRSAs. These types of businesses may rely on a workforce which has lower levels of education and technical skills. Additionally, businesses such as these may also have higher turnover and offer lower wages. The employment distribution by industry sector within each NRSA presents an interesting picture of their relative industry advantage. Figure 10 shows that while many industries have similar representation across the NRSA's, the Manufacturing industry represents 31 percent of the jobs found in NRSA 5. Manufacturing jobs tend to have higher pay and require workers to have technical skills. The data also shows that NRSA 3 has about 15 percent of its local employment clustered in the Finance, Insurance, and Real Estate industries. On average, these industries tend to pay more than traditional retail and service sector jobs.</p> <p>Affordable Housing including Senior Emergency Repairs, Lead Programs, 0% Loans to Single Family dwellings aimed at homeowners Economic Development Initiatives such as Workforce Development and Small Business Development and Microenterprise Assistance, Public Infrastructure improvements along major corridors are aligned with the following initiatives:</p> <p>Strategic Neighborhood Fund: a 5-Year strategic investment that will target ten (10) neighborhoods within the City including the following neighborhoods: Livernois-McNichols, Grand River Northwest (NRSA 1) Warrendale/Code-Rouge (NRSA 2), Capua/Banlatown, Islandview/Greater Villages, Jefferson Chalmers, East Warren/Cadieus, Gratiot/7-Mile, Russell Woods/Nardin Park, and Southwest Vernor</p> <p>Housing Resource Centers: Create a network of community organizations to deliver housing stability services to Detroit residents. First year pilot program will work with the following organizations: Bridging</p>
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		<p>Neighborhoods, Central Detroit Christian Community Development, Jefferson East Inc., and U SNAP BAC</p> <p>Detroit Affordable Housing Leverage Fund (AHLF): The AHLF supports the creation and maintenance of affordable housing and neighborhoods throughout the entire City. Managed by LISC.</p> <p>The City of Detroit has five objectives it is trying to achieve through the NRSAs:</p> <ol style="list-style-type: none">1. Stabilize neighborhoods with a 0% Interest Home Loan Program.2. Support small businesses3. Create jobs4. Create summer youth employment5. Build wealth
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<p>Are there barriers to improvement in this target area?</p>	<p>Problems in these NRSAs are like the City as a whole. According to the 2010 American Community Survey (ACS) data from the Census Bureau 67 percent of the City's population was low and moderate-income (LMI) households (80% AMI or below) and its upper-quartile percentage of census block groups containing low-and-moderate-income households was 90 percent.</p> <p>The designated NRSA areas within the City of Detroit also account for 53% of the City's total housing stock, which is older with 87% built prior to 1970. This creates challenges around on-going maintenance and rehabilitation of residential structures, particularly with the lower household incomes of many Detroit residents.</p> <p>Finally, each of the NRSAs, except for NRSA 5, fell below Detroit's median value. The age of the housing stock, median household incomes, and impacts of the Great Recession have created a significant housing challenge for many of Detroit's neighborhoods.</p> <p>According to the City of Detroit's RMS Crime Incidents data, between 2017 and 2019 incidents of crime has risen 3.1 percent from 81,454 to 83,956. In 2019, 66 percent of crime incidents fell into five categories which include assault, larceny, property damage, aggravated assault, and fraud. The number of homicides citywide were also up 7 percent over the three year period.¹³ Utilizing the NRSA strategy can help bring added investment in housing, infrastructure, and jobs to these neighborhoods to help create more opportunities for residents and improve the places they live.</p> <p>Transportation is a key component of an individual or family's quality of life. Transportation provides access to jobs, school, healthcare, childcare, grocery stores, parks and recreation, and much more. Nearly 70 percent of Detroit residents over the age of sixteen and in the workforce drove to work alone in a personal</p>
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		vehicle, while 13 percent carpooled. Only 9 percent of Detroit’s working residents utilized public transportation to get to work. The large majority, nearly 90 percent, of Detroit resident workers had access to at least one personal vehicle for commuting purposes. Only 11 percent of resident workers did not have access to a vehicle. ¹⁴
2	Area Name:	Slums and Blight Designation
	Area Type:	HUD approved Slum and Blight Areas
	Other Target Area Description:	HUD approved Slum and Blight Areas
	HUD Approval Date:	Not applicable. City designation based on State requirements
	% of Low/ Mod:	
	Revitalization Type:	Slum and blight removal and redevelopment of substandard structures
	Other Revitalization Description:	
	Identify the neighborhood boundaries for this target area.	<p>There are three designated Slum and Blight Areas.</p> <ol style="list-style-type: none"> 1. Cody Rouge and Warrendale - Bounded roughly by Rouge Park to the West, Fullerton/I-96 to the North, Southfield Freeway to the east (includes east of Southfield freeway at Tireman), and the City boundaries to the South. 2. Delray - Generally bounded by I-75 to the North, Grand Blvd to the East, Jefferson to the South, and Rouge River to the West. 3. Conant-Davison - Bounded generally by Davison and McNichols to the North, Mount Elliot to the East, and the City boundary with Hamtramck/Highland Park to the South and West.

¹³ City of Detroit Open Data Portal, RMS Crime Incident Data, 2017-2019.

¹⁴ ACS 2015, Table B08141.

<p>Include specific housing and commercial characteristics of this target area.</p>	<p>1. Cody Rouge and Warrendale - This area is a tipping point neighborhood. The 2010 population of 36,849 represented a 17.9 percent decrease over 2000's total of 44,894. Although this is lower than the 25 percent loss experienced by the City of Detroit the area still struggles to overcome blighted conditions. Twenty-seven percent of the properties are either unoccupied, vacant, or unimproved lots, or in poor condition.</p> <p>2. Delray - Delray is isolated from other areas of Detroit by industrial warehouses and I-75. The area has seen a significant loss of population due to industrial development and the construction of I-75. According to 2010 Census, the two tracts that cover the area had a population of 2,783, a 33 percent decrease in population from the 2000 Census. This loss of population has resulted in a high level of vacancy and properties that are in poor condition. High levels of illegal dumping on vacant lots is another issue faced in Delray.</p> <p>3. Conant-Davison - The area is known for the influx of Bangladeshi immigrants that have moved into the neighborhood as well as a growing population of artist. Pockets of new investments exist with community gardens, renovated homes, a skate park, and other community efforts. In this area 44 percent of the properties are unoccupied, vacant/unimproved lots, or in poor condition.</p>
<p>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</p>	<p>HRD held two virtual public hearings and conducted online surveys to residents, businesses, non-profit organizations, landlords, to identify and prioritize housing and community development needs. Parcel data from the Motor City Mapping Survey was used to help determine if an area met HUD requirements for designating an area as blighted.</p>

	<p>Identify the needs in this target area.</p>	<p>"Blighted Area" means a portion of a municipality, developed or undeveloped, improved or unimproved, with business or residential uses, marked by a demonstrated pattern of deterioration in physical, economic, or social conditions, and characterized by such conditions as functional or economic obsolescence of buildings or the area as a whole, physical deterioration of structures, substandard building or facility conditions, improper or inefficient division or arrangement of lots and ownerships and streets and other open spaces, inappropriate mixed character and uses of the structures, deterioration in the condition of public facilities or services, or any other similar characteristics which may include any buildings or improvements not in themselves obsolescent, and any real property, residential or nonresidential, whether improved or unimproved, the acquisition of which is considered necessary for the rehabilitation of the area. It is expressly recognized that blight is observable at different stages of severity, and that moderate blight untreated creates a strong probability that severe blight will follow. Therefore, the conditions that constitute blight are to be broadly construed to permit a municipality to make an early identification of problems and to take early remedial action to correct a demonstrated pattern of deterioration and to prevent worsening of blight conditions.</p>
	<p>What are the opportunities for improvement in this target area?</p>	<p>The 0% interest home loan program will be extended to the three designated Slum and Blight Areas. The rehabilitation of substandard housing can improve housing conditions and inspire neighbors to improve their property.</p>
	<p>Are there barriers to improvement in this target area?</p>	<p>Continued housing foreclosures and population loss can exacerbate a demonstrated pattern of deterioration and conditions.</p>
<p>3</p>	<p>Area Name:</p>	<p>City-Wide</p>
	<p>Area Type:</p>	<p>City-Wide</p>

Other Target Area Description:	City-Wide
HUD Approval Date:	
% of Low/ Mod:	
Revitalization Type:	Not applicable
Other Revitalization Description:	
Identify the neighborhood boundaries for this target area.	City-wide projects can be established in any eligible area within the City of Detroit.
Include specific housing and commercial characteristics of this target area.	Through citizen input, areas in need of intervention have been identified and assigned various levels of assistance according to area housing, blight, and service needs.
How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	HRD held two virtual public hearings and conducted online surveys to residents, businesses, non-profit organizations, landlords, to identify and prioritize housing and community development needs
Identify the needs in this target area.	Public Services, demolition, and other programs are done on a City-wide basis.
What are the opportunities for improvement in this target area?	As strategic areas are identified by Detroit Future City and Investment Strategy initiatives HRD can assign more funding to target areas within the City.
Are there barriers to improvement in this target area?	City-wide projects can be spread thin making it difficult to show impact.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 15 – Priority Needs Summary

1	Priority Need Name	Rehabilitation of existing owner-occupied units
	Priority Level	High
	Population	Extremely Low Income Low Income Moderate Large Families, Families with Children Elderly Veterans
	Geographic Areas Affected	City-Wide HUD approved NRSAs City designated Slum and Blight Areas
	Associated Goals	Safe and affordable owner-occupied housing Expand supply of owner-occupied housing
	Description	The City will use CDBG funds in the form of zero interest loans for non-elderly households and grants for elderly households leveraged with private capital to keep residents in their homes. The City also use CDBG funds to address related emergencies in houses receiving funding through the Lead abatement programs.
	Basis for Relative Priority	The prioritization of rehabilitation of existing owner-occupied houses was determined through residents and other stakeholder surveys, public meetings, and data that shows the City has a much older housing stock.
2	Priority Need Name	Increase in affordable rental housing options
	Priority Level	High

	Population	Extremely Low Income Low Income Moderate Large Families, Families with Children Elderly Public Housing Residents Individuals Elderly Frail Elderly
	Geographic Areas Affected	City-Wide
	Associated Goals	New construction or acquisition/rehab of affordable rental housing Help those with special needs (non-homeless) Reduce homeless citizens in the City of Detroit
	Description	Increase the availability of new, as well as the preservation of existing, single family and multi-family rental housing for low- to-moderate-income households.
	Basis for Relative Priority	The prioritization of increase in affordable rental housing options was determined through residents and other stakeholder surveys, public meetings, and data that shows the City has a much older housing stock. As well, there is a risk of losing affordable rental housing units due to deferred maintenance, conversion to market units, and inadequate affordable housing subsidies.
3	Priority Need Name	Increased homeownership opportunities
	Priority Level	Low
	Population	Extremely Low Income Low Income Moderate Large Families, Families with Children Elderly Public Housing Residents Individuals veterans

	Geographic Areas Affected	City-Wide HUD approved NRSAs
	Associated Goals	Expand supply of homebuyer housing – financial assistance Expand supply of homebuyer housing – HOME CHDO or CDBG CBDO
	Description	The City will use CDBG and HOME funds to create affordable homeownership opportunities for low- to moderate-income households. These will be in the form of down payment and closing costs assistance to purchase existing homes and development subsidies to develop single family houses through certified HOME Community Housing Development Organizations (CHDOs) or CDBG Community Based Development Organizations (CBDOs).
	Basis for Relative Priority	The relative priority of increased homeownership opportunities was determined through residents and other stakeholder surveys, public meetings, and data that shows the City has a 47% homeownership rate -American Community Survey (ACS) July 2019.
4	Priority Need Name	Expand economic development opportunities
	Priority Level	High
	Population	Extremely Low Income Low Income Moderate Income Middle Income Large Families, Families with Children Elderly Public housing residents Non-housing Community Development Other
	Geographic Areas Affected	City-Wide HUD approved NRSAs
	Associated Goals	Creation or retention of jobs for LMI individuals Assistance for small businesses and microenterprises

	Description	These programs support local businesses that create jobs and provide vital goods and services that strengthen the surrounding community. These programs also enhance the appearance and historical character of individual buildings in commercial districts. We plan to provide direct financial assistance to small businesses, commercial façade improvement for businesses in SNF areas and fund a loan guarantee program making access to capital easier for small businesses.
	Basis for Relative Priority	The prioritization of expanding economic development opportunities was determined through residents and other stakeholder surveys, public meetings, and data that shows there is a need for jobs and neighborhood small businesses
5	Priority Need Name	Increased employment training – public services
	Priority Level	High
	Population	Extremely Low Income Low Income Moderate Income Middle Income Large Families, Families with Children Elderly Public housing residents Non-housing Community Development Other
	Geographic Areas Affected	City-Wide HUD approved NRSAs
	Associated Goals	Creation or retention of jobs for LMI individuals Increased public services
	Description	The City will use public services funding to provide employment training for the increasing job market in the City’s downtown and neighborhoods to build technical and soft skills to qualify for new jobs.
	Basis for Relative Priority	The prioritization of employment training was determined through residents and other stakeholder surveys, and data that shows there is a need for skills to meet the workforce needs in the City. Employment training had the highest priority score (76%) for all activities
6	Priority Need Name	Increase Public Improvement & Infrastructure

	Priority Level	High
	Population	Extremely Low Income Low Income Moderate Large Families, Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	City-Wide
	Associated Goals	Sustain Infrastructure and Public Improvements CDBG Declared Disaster Recovery Grant
	Description	Improvements to and expansion of public facilities and infrastructure within the City of Detroit
	Basis for Relative Priority	Improvements to and expansion of public facilities and infrastructure was determined through public meetings and an online survey. Also, water, street and sidewalk improvements were identified as a high priority by 65-69% of survey respondents.
7	Priority Need Name	Increased Community and Public Facilities
	Priority Level	High

	Population	Extremely Low Income Low Income Moderate Large Families, Families with Children Elderly Public Housing Residents Individuals Families with Children Elderly Frail Elderly
	Geographic Areas Affected	City-Wide
	Associated Goals	Improved public facilities
	Description	The City will provide CDBG funding to improve public facilities in neighborhoods where at least 51% of the population are low-to- moderate -income households
	Basis for Relative Priority	The prioritization of public facility improvements was determined through public meetings and an online survey. Community youth centers, childcare centers, and community centers were ranked with an average of 64% of survey respondents scoring them as high need.
8	Priority Need Name	Increased Public Services
	Priority Level	High

	Population	Extremely Low Income Low Moderate Income Middle Income Large Families, Families with Children Public Housing Residents Individuals Families with Children Chronic Substance Abuse Veterans Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	City-Wide HUD approved NRSAs
	Associated Goals	Public services to low-to -moderate-income households and individuals
	Description	A variety of public services including labor, supplies, and materials eligible under 24 CFR part 570.201 (e) will be provided to residents based on a new service or an increase in an existing service up to 15% of CDBG grant. NRSAs allow the City to exceed the 15% cap on public services.
	Basis for Relative Priority	The prioritization of increased public services was determined through citizen participation in public meetings and an online survey. The highest priority public service activities were mental health services (72%), transportation (70%), fair housing (66%), homeless services (67%), and youth activities (66%)
9	Priority Need Name	Demolition and Clearance
	Priority Level	Low

	Population	Extremely Low Income Low Income Moderate Large Families and Families with Children Elderly Public Housing Residents Individuals Families with Children
	Geographic Areas Affected	City-Wide HUD approved NRSAs City designated Slum and Blight Areas
	Associated Goals	Blight removal and demolition
	Description	Demolition and clearing of existing housing structures within the City of Detroit
	Basis for Relative Priority	Although this activity was rated as low need by the surveys, it was identified as an area for funding. Empirical data shows that City has significant deferred demolition which is impacting the redevelopment of many communities due to slum and blighted conditions. Need for blight removal activities
10	Priority Need Name	Homeless Prevention
	Priority Level	High
	Population	Extremely Low Income Low Income Large Families, Families with Children Elderly Frail elderly Chronic Homelessness At risk for homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans
	Geographic Areas Affected	City-Wide

	Associated Goals	Reduce homeless citizens in City of Detroit
	Description	The City of Detroit will use CDBG and ESG funds towards meeting the needs of persons and households at risk of homelessness.
	Basis for Relative Priority	The prioritization of homeless prevention was determined through citizen participation in public meetings and an online survey. HUD data confirmed the priority of homeless prevention. Homeless prevention activities such as support services for homeless prevention (72%), emergency support services (70%) were identified as “High” need.
11	Priority Need Name	Emergency Shelter and Transitional Housing
	Priority Level	High
	Population	Extremely Low Income Low Income Large Families & Families with Children Elderly Chronic Homelessness Individuals Families with Children veterans
	Geographic Areas Affected	City-Wide
	Associated Goals	Reduce homeless citizens in City of Detroit
	Description	The City of Detroit will use CDBG and ESG funds towards meeting the needs of persons and households for Emergency Shelter and Transitional Housing
	Basis for Relative Priority	The prioritization of Emergency Shelter and Transitional Housing was determined through citizen participation in public meetings and an online survey. HUD data confirmed the priority of Emergency Shelter (69%) and Transitional Housing. Homeless prevention activities such as Emergency Shelter and Transitional Housing were identified as “High” need.
12	Priority Need Name	Rapid Re-housing
	Priority Level	High

	Population	Extremely Low Large Families and Families with Children Elderly Chronic Homelessness Individuals Families with Children veterans
	Geographic Areas Affected	City-Wide
	Associated Goals	Reduce homeless citizens in City of Detroit
	Description	The City will provide CDBG and ESG funding for Rapid Re-housing and related activities to ensure that residents are able to move back into their homes.
	Basis for Relative Priority	Need to rapidly re-house households to decrease the amount of time spent homeless. The prioritization of Rapid Rehousing was determined through citizen participation in public meetings and an online survey. HUD data confirmed the priority of Emergency Shelter (69%) and Transitional Housing as “High” need.
13	Priority Need Name	Permanent Housing
	Priority Level	High
	Population	Extremely Low Income Low Income Moderate Middle Large Families Chronic Homelessness Families with Children Individuals veterans
	Geographic Areas Affected	City-Wide NRSA Areas
	Associated Goals	Reduce homeless citizens in City of Detroit New construction and acquisition of affordable rental housing

	Description	The City will provide CDBG and ESG funding for permanent housing and related activities to ensure that temporarily housed individuals and their families are able to transition into decent and affordable permanent housing.
	Basis for Relative Priority	The prioritization of permanent housing to address homelessness (69%) was determined through citizen participation in public meetings and an online survey. HUD data confirmed the priority.

Narrative (Optional)

N/A

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	<p>Detroit rental costs remain relatively low when compared to other cities. However, that is offset by relatively lower income levels, which forces residents to seek subsidies such as TBRA and Section 8 vouchers. HRD has historically used CDBG as a match for ESG which will be used to fund among other activities rapid rehousing and rental assistance programs to prevent homelessness. CDBG Funds may not be used for on-going income payments such as paying for a tenant’s rent except income payments that are emergency in nature and do not exceed three consecutive months. The Detroit Housing Commission (DHC) supplies about 6,000 housing choice vouchers per year. That number has been steady over the years and most likely will not change. Even with these levels of assistance, there is usually a waiting list of approximately 9,000 people a year for vouchers in Detroit. The coronavirus epidemic with its resultant economic dislocation has led to greater risk of homelessness and the greater need for rental assistance.</p>
TBRA for Non-Homeless Special Needs	<p>According to a 2018 study by the Michigan Department of Health, The City had an HIV diagnosis rate of more than 33 new cases per year, and a prevalence rate of over 713 persons living with HIV (per 100,000 residents). These rates are over 3.5 times higher than the next highest jurisdiction. The Detroit Department of Health oversees the City’s HOPWA program and combines HOPWA funding for TBRA with Ryan White funds for services. Approximately two-thirds of the HOPWA budget is for the TBRA program. This TBRA programs historically assists about 200 individuals and households a year.</p>
New Unit Production	<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 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. HOME funds may periodically be used in affordable housing development projects, but most new unit production in Detroit is funded through the State’s Low-Income Housing Tax Credit (LIHTC) program or federal programs like the Section 202-Supportive Housing for the Elderly Program.</p>

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Rehabilitation	<p>HRD's housing efforts will continue to focus on rehabilitation. In 2015, the City of Detroit created a zero percent home repair loan funds using 50% CDBG and 50% private capital. As of July 30, 2020, the City has provided funding for approximately 515 owner-occupied rehabilitations and plans to continue funding this program throughout the 5-year Consolidated Plan period. The private capital allowed the City to leverage its CDBG dollars and the use of a loan will result in the CDBG dollars being recycled for future investment in home repair. In addition, the City used HUD designated Neighborhood Revitalization Strategy Areas (NRSAs) to serve households above 80% AMI who were unable to access private capital directly through the banks for home repairs due to low housing values. This strategy helped the City to retain its population and prevent homelessness due to inability of homeowners to repair their homes. For elderly and fixed income households that cannot afford even the zero percent interest loans, the City uses CDBG funds as grants for repairs for those homeowners. State and federal lead abatement grants are also used to address rehabilitation of single-family houses.</p> <p>While the City has an aggressive demolition schedule HRD will continue to fund these and other efforts for homes that can be rehabilitated to combat blight and make neighborhoods livable.</p>
Acquisition, including preservation	<p>The city of Detroit has lost more than 60 percent of its population over the last 70 years, resulting in large numbers of vacant and abandoned properties. In 2014, the Detroit Blight Removal Task Force estimated that 40,077 structures (residential and commercial) met the definition of blight and has subsequently demolished over 13,000 units. Additional housing unit losses are expected as the City continues its programs to combat blight through demolition and code enforcement.</p> <p>Presently, there are over 109,000 vacant housing units in the city, accounting for almost 30 percent of the entire housing stock. Detroit therefore has ample housing units to serve its residents, but does not have enough decent, safe, and affordable housing units to adequately house its LMI residents.</p> <p>While demolition has been a singular priority for many years, it is now just one part of a larger revitalization and neighborhood stabilization plan that includes the acquisition and preservation of existing vacant units through resources such as the AHLF. The Affordable Housing Leverage Fund (AHLF) encourages the preservation of affordable housing throughout the City of Detroit and is expected to contribute to the goal of preserving 10,000 units of existing affordable housing.</p>

Table 16 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 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 the last fiscal year, the City did receive a total of 215,827 in loan settlements. The HOME Program Income last fiscal year was 1,931,510 and 1,000,000 in returns, totaling 2,931,510 available in the 2020-21 fiscal year. Also, the city is expected to receive approximately 1,161,582 of revolving loan proceeds from the 0% interest loan home repair program. These proceeds will be invested back into the program. The below figures are based on 2020 Fiscal Year awards.

	1 year	5 year
CDBG	\$ 35,282,359.00	\$ 176,411,795.00
HOME	\$ 7,268,033.00	\$ 36,340,165.00
ESG	\$ 3,032,870.00	\$ 15,164,350.00
HOPWA	\$ 2,903,135.00	\$ 14,515,675.00
Total	\$ 48,486,397.00	\$ 242,431,985.00

Based on the above allocations, the City of Detroit anticipates receiving a total of \$242,453,765 from all HUD entitlement grant sources over the five-year period of the Consolidated 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 Facility Rehabilitation, Owner-occupied Home Repair, Rehabilitation of rental housing, Relocation, and staffing costs

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

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services Historic Preservation	35,282,359	0.00	1,161,582	36,443,941	141,129,436	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

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	7,268,033	1,931,510	1,000,000	10,199,543	29,072,132	HOME funds will be used to provide affordable housing including multifamily, rental, new construction, rehabilitation, and homebuyer activities to families whose household income is at 80% of the Area Median Income or less. Assistance will be provided in the form of grants and/or loans to for-profit and non-profit developers as gap financing. HOME funds will be leveraged with private and public funding sources to support the development of single and multifamily units through Low Income Tax Credits, equity from Federal Historic Tax Credits, developer equity, and from other banks and lending programs.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of 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	2,903,135	0.00	0.00	2,903,135	11,612,540	The HOPWA program funds will be used to serve homeless and non-homeless persons who meet income guidelines and are infected/and or affected by HIV/AIDS through Tenant Based Rental Assistance (TBRA) and Community Residential Programs while providing information and supportive services.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of 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	3,032,870	0.00	0.00	3,032,870	12,131,480	ESG funds will provide a 1 to 1 match with the CDBG Program. Funds will be used for Emergency Shelters, Warming Centers, Homeless Prevention, Rapid Re-Housing and Street Outreach with the primary goal of eliminating homelessness

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of 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 1				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 seven 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 1				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 17 - Anticipated 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.

- **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. Before enactment of tax reform legislation at the end of 2017, there was also a 10 percent non-historic rehabilitation tax credit for pre-1936 buildings. These Federal tax incentives are used to stimulate private investment in the rehabilitation and reuse of historic structures.

- **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. The City provides funding for 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 through the City's Affordable Housing Leverage Fund (AHLF) which is administered by the Detroit office of Local Initiatives Support Corporation (LISC). See below.

In FY 2018, two housing projects that received 9% competitive LIHTC allocations were Pablo Davis II (\$451,066) and The Sanctuary (\$800,000). For the October 2019 Funding round, three additional projects in the City received increased credits for existing LIHTC projects, The Anchor at Mariners Inn (\$1,300,000); Benjamin O. Davis Veterans Village, (\$1,178,471), and La Joya Gardens (\$811,553). In the June 2020 funding round, the following five LIHTC projects were awarded tax credits: Brush (\$1,500,000), Friendship Meadows Apartments II (\$476,964), Left Field (\$1,207,610), Midtown Square Apartments (\$1,229,873), and Reverend Dr. Jim Holley Residences (\$1,031,459),

- **Bank of America and Quicken Loans/Local Initiatives Support Corporation**

Bank of America (BoFA) provides private capital through Local Initiatives Support Corporation, a national community development financial intermediary (CDFI) with a local office in Detroit, for the City of Detroit's 0% Home Repair Loan program. These private funds are matched dollar for dollar with the City's CDBG funding to provide necessary 0% interest home repair loans to eligible LMI homeowners citywide. In 2019, BoFA provided \$1.5 million in funding to this effort and as of March 2020, has provided a total of \$6,700,000 in private capital to date. In 2019, Quicken provided \$1 million to support lead-based repairs, loan capital and administrative costs for the 0% Home Repair Program. In addition, Bank of America provided a \$1 million operating grant to "Invest Detroit" to support its expansion of the Strategic Neighborhood Fund (SNF).

- **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 seven 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.¹⁵

- **The Preservation Housing Partnership**

The City of Detroit Housing & Revitalization Department (HRD) has partnered 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.

- **Affordable Housing Leverage Fund (AHLF)**

¹⁵ Strategic Neighborhood Fund. Retrieved September 23, 2020. <https://investdetroit.com/an-unprecedented-effort-to-strengthen-our-neighborhoods/>

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) partnered 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 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.

- **Choice Neighborhoods**

The City plans to apply for a HUD's Choice Neighborhoods Initiative (CNI) Implementation Grant due in December 2020. The Choice Neighborhoods program leverages significant public and private dollars to support locally driven strategies that address struggling neighborhoods with severely distressed public and/or HUD assisted housing through a comprehensive approach to neighborhood transformation. The proposed application involves the implementation of a comprehensive Transformation Plan in Greater Corktown 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. Given this context, the City engaged in an in-depth neighborhood planning process, to ensure that the Transformation Plan reflects the needs and priorities of existing residents. The vision for the neighborhood involves creating high-quality affordable and mixed income housing options, including opportunities for homeownership across the income spectrum, as well as targeted investments in neighborhood and people to support long-term stabilization. The full CNI housing plan aims to create approximately 900 new units, with more than 50% affordable to low-income residents with a mix of affordability levels. This includes the redevelopment of the 86 existing assisted units at Clement Kern Gardens as well as 40 new homeownership units. The development team will seek Housing Choice Vouchers through the Detroit Housing Commission to support this housing plan. HRD is coordinating the CNI application process and plans to support neighborhood and housing initiatives within the plan through CDBG and HOME investment.

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 2019, 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 2020 HOME funds as well and it is anticipated that 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 which 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 which 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 2015, several large philanthropic organizations, including The Bank of America Charitable Foundation, The Erb Family Foundation, and The Kresge Foundation have awarded over \$3.7 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 2016, DFC has awarded more than \$330,000 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 more attractive neighborhoods. Adaptive reuse projects through this program make use of DFC vacant land transformation designs published in the [DFC Field Guide to Working With Vacant Lots](#).

Discussion

See above.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Planning & Development Department (P&DD)	Dept and Agencies	Historic designation advisory, historic review clearances, planning studies, site plan review, city master plan, zoning district boundaries approvals, and development plans.	Jurisdiction
Detroit Building Authority (DBA)	Dept and Agencies	Demolition of residential and commercial building and elimination of blight within the 7 districts in Detroit.	Jurisdiction
Detroit Land Bank Authority (DLBA)	Dept and Agencies	Demolition of residential and commercial building and elimination of blight within the 7 districts in Detroit.	Jurisdiction
Department of Neighborhoods (DON)	Dept and Agencies	Help 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.	Jurisdiction
Detroit Health Department	Dept and Agencies	Provide programs/services. Lead Prevention Program, Lead Safe Detroit, Lead Abatement Grant, Lead Education, Healthy Homes Detroit Program, The Housing Opportunities for Persons with AIDS (HOPWA) grant programs; and Tenant Based Rental Assistance (TBRA), Community Residential/Transitional, and Housing Supportive Services.	Jurisdiction
Building Safety Engineering and Environmental Department (BSEED)	Dept and Agencies	Lead hazard inspection for a rental property; rental housing compliance	Jurisdiction
Detroit Department of Transportation (DDOT)	Dept and Agencies	Public transportation operator of city bus service in Detroit	Jurisdiction

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Detroit Housing Commission (DHC).	Public Housing Authority (PHA)	Public Housing: The DHC manages the following program: Section 8 - Low-income public housing.	Jurisdiction
Wayne Metropolitan Community Action Agency (WMCAA)	Dept and Agency	Homeless Programs and services: WMCAA provide 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	Jurisdiction
Detroit Economic Growth Corp	Redevelopment Authority	The DEGC serves as the economic driver for development initiatives for the City. In addition to this, the DEGC's role through the Motor City Match program is to create jobs by giving technical assistance to entrepreneurs and assist with business expansion within the City.	Jurisdiction
Detroit Employment Solutions Corporation (DESC)	Dept and Agencies	DESC is one of the State's Michigan Works! Association and is the lead for the City's Detroit at Work, which provides job placement, training, and career advisement.	Jurisdiction
Local Initiatives Support Corporation (LISC)	Private Industry	Zero Percent Home Repair Loan (homeowners program). We invest in affordable housing, growing businesses, safer streets, high-quality education, and programs that connect people with financial opportunity.	Jurisdiction
Homeless Action Network of Detroit (HAND)	Continuum of Care	Homelessness, Non-homeless special needs, Public Housing, Rental, public services	Jurisdiction
DAAA - Detroit Area of Aging Agency	Non-profit organizations	public services	Jurisdiction
Detroit Housing Coalition (DHC)	Non-profit organizations	public services, homelessness	Jurisdiction

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Fair Housing Center of Metropolitan Detroit	Non-profit organizations	public services	Jurisdiction

Table 18 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

Detroit through its HRD operates its institutional structure and directs the strategy, development, and management of the City’s housing policy and U.S. Department of Housing and Urban Development entitlement funding. The department’s activities are implemented through six divisions:

- **Housing Underwriting Division’s** mission is to invest the City’s federal and other housing resources to create new affordable single-family and multifamily projects and homelessness prevention strategy.
- **Community Development Underwriting Division’s** mission is to provide impact driven Community Development Block Grant (CDBG) funding to low – to – moderate income persons in order to help stabilize neighborhoods and sustain a healthy and safe environment for City of Detroit residents.
- **Public-Private Partnerships Division’s** mission is to leverage both public and private funds to strategically transform neighborhoods that have mixed-income and mixed-use developments.
- **Policy and Implementation Division’s** mission is to create development and policy initiatives. The initiatives are geared toward preserving and creating more affordable housing opportunities, as well stabilizing Detroit’s housing market, and opportunities for Detroit immigrants.
- **Real Estate/Special Projects Division** mission is to coordinate and manage surplus real estate sales, as well as provide the Director and other divisions with real estate, contract, and legal support.
- **Administration and Finance Division** mission is to lead process in the department and ensure compliance with federal, state, county, local, and grantor regulations.

HRD also uses partnerships and collaborations to carry out its programs. Consolidated Plan programs are usually carried out directly by the grantee or through contracts with subrecipients, Community Based Development Organizations (CBDOs) or in the case of the HOME program Community Housing Development Organizations (CHDOs). There are 12 organizations that were certified Community Housing Development Organizations (CHDOs) at one point with varying levels of capacity. With the changes to the 2013 HOME Final Rule requiring development capacity and dedicated staffing as certification criteria, many CHDOs may no longer qualify. CHDOs are also required to be recertified each time they have a

HOME funded project. HRD currently works with five certified CHDOs that have specific HOME-assisted projects.

The revitalization of the City is organized under the Mayor's Office. The Mayor's Office uses several departments and agencies to implement programs while streamlining processes formerly handled by several agencies throughout the City of Detroit. For example, Blight Control and Demolition is now coordinated between DBA, DLBA, and the DONs. Blight control and demolition moved from using multiple agencies and departments throughout the City of Detroit to three agencies with separate and distinct functions. The General Services Division oversees large-scale improvements and public facility maintenance. The Mayor's office also handles coordination with other public and private entities to allocate and target scarce resources.

A partnership-based structure requires communication, information sharing, planning, and in many instances joint implementation and evaluation. These are all strengths in the partnership structure. The partnership structure also uses the expertise of contractors, subrecipients and others with the specialized knowledge needed to carry out functions and projects. The process and environment are controlled through contracts with subrecipients, agreements with other City departments and entities as well as other governmental agencies.

The City has enhanced its institutional delivery system using strategic partnerships including several CDFIs such as Detroit LISC, Develop Detroit, financial institutions, and the philanthropic community. Through these organizations, the City has been able to leverage its federal grants with private sector resources to carry out its affordable housing and community development strategies. Examples of these partnerships are the Zero interest home repair loan program, the Detroit Affordable Housing Leverage Fund (AHLF), and the Strategic Neighborhood Fund (SNF). The City has been able to leverage millions of dollars and provide flexible capital to developers of affordable housing.

The Continuum of Care (CoC) local planning process supports the Detroit area homeless prevention, emergency shelter, transitional housing, permanent supportive housing, and supportive service needs. The City of Detroit continues to remain an active partner within the CoC and maintains a productive relationship with the Homeless Action Network of Detroit (HAND) which is the lead agency in the CoC. HAND helps to manage the local planning process for communities to provide a full range of prevention, emergency shelter, transitional housing, and permanent supportive housing. Specific groups helped include homeless and chronically homeless individuals, veterans, families, and unaccompanied youth.

The City of Detroit administers its Housing Opportunities for Persons with Aids (HOPWA) grant through the Detroit Health Department. Besides the HOPWA program, senior citizens and persons with disabilities receive services from Detroit Agency on Aging (DAA).

Public service activities such as youth and senior services, education, employment assistance, summer jobs, health recreation, and homeless prevention are carried out using non-profit organizations.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	X
Mortgage Assistance	X	X	X
Rental Assistance	X	X	X
Utilities Assistance	X	X	X
Street Outreach Services			
Law Enforcement			
Mobile Clinics	X	X	X
Other Street Outreach Services	X	X	X
Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X	X	
Employment and Employment Training	X	X	
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X
Other			
Other			

Table - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth).

Homeless persons and persons with HIV access to services are generally unique to the service needed. For example, persons may access substance abuse treatment services by contacting the City of Detroit’s Bureau of Substance Abuse directly. Additional services may be accessed by contacting the provider organization directly on a walk-in basis. The following services: childcare, transportation, life skills, case management, are typically a part of the overall “package” of services providers make available to people that come into their programs. If a person requires a service not offered by the provider they are working with, referrals are made to other providers in the community that can provide the service.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above.

Within the Continuum of Care the majority of homeless organizations use HMIS to report data, but there are still organizations that do not use it; therefore, there may be an under-representation of the actual number of people who were homeless over the past year. Additionally, this number does not include those households that may be precariously housed and at-risk of homelessness.

The Continuum of Care has developed written performance standards and evaluation techniques for the use of ESG and other funds as well as a Performance and Evaluation Committee which oversees implementation and a collaborative monitoring process for all recipients of homeless funding. HAND assists HRD with the CDBG and ESG Request for Proposals process to find high capacity providers which is often challenging as well as ensuring that the allocation and use of funds meets the needs of persons with special needs and those experiencing homelessness.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs.

The City of Detroit's strategy for overcoming gaps in the institutional structure involves the public sector (Federal, State, and Local government) as well as private businesses, community organizations and other public and private institutions. The primary strategy is the coordination of resources, partnership, and communication within these structures as well as between them.

Historically, through P&DD and now HRD, the Administration submits a proposed CDBG budget for Council consideration. In turn, the City Planning Commission staff in support of the Citizens Review Committee and the City Planning Commission prepares recommendations to Council. HRD staff, which is responsible for administering the program, oftentimes feels it has little influence over the choices made by City Council. In consultation with HUD, HRD staff will collaborate with CPC and City Council to devise a more effective process for strategic allocation of our scarce resources for our next budget cycle.

The City of Detroit has expanded its relationship with the Detroit Economic Growth Corporation (DEGC) to reduce redundant function and increase collaboration for real estate and economic development activities.

The City has also established various task forces (such as, the Housing Task Force and the Detroit Lead Partnership) and local collaborative meetings between housing stakeholders, social service stakeholders and citizens to maintain communication and coordination. The Mayor's office has also established a faith-based liaison as a point of contact with the faith-based community.

The Administration will also evaluate elements of the HRD organizational charts in search of opportunities to increase efficiency, effectiveness, and clarity of responsibility for increased accountability.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Reduce homeless citizens in City of Detroit	2020	2024	Homeless	City-Wide	<p>Increase in affordable rental housing option</p> <p>Homeless Prevention Rental Assistance Homeless Outreach Emergency Shelter and Transitional Housing Rapid Re-housing</p>	<p>CDBG: \$12,294,120</p> <p>ESG: \$15,164,350</p> <p>Coc: \$130,689,865</p>	<p>Tenant-based rental assistance / Rapid Rehousing: 15,000 Households Assisted</p> <p>All "Extremely Low" income benefit Homeless Person Overnight Shelter: 9,500 Persons Assisted</p> <p>All "Extremely Low" income benefit Overnight/Emergency Shelter/Transitional Housing Beds added: 1205 Beds</p> <p>All "Extremely Low" income benefit Homelessness Prevention: 9,000 Persons Assisted</p> <p>All "Extremely Low" income benefit Homeless Outreach: 2,575 Persons Assisted</p>

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Rehabilitation of Existing Housing Units	2020	2024	Affordable Housing rehabilitation of existing housing units	City-Wide NRSA	<p>Rental Assistance</p> <p>Production of new housing units</p> <p>Rehabilitation of existing units</p> <p>Acquisition Rehabilitation of Existing Units incl 0% loan and Sr. Home Repair programs and Lead Remediation</p> <p>Development of Permanent Supportive Housing</p>	<p>HOME: \$36,340,165</p> <p>CDBG: \$5,000,000</p> <p>CDBG: \$32,500,000</p>	<p>Rental units constructed: 400 Household Housing units</p> <p>Homeowner Housing Rehabilitated: 2,000 Household Housing Units 20% extremely low; 40% low; 35% low/mod; 5% middle income</p> <p>Rental Units rehabilitated: 2,000 Household Housing Unit 20% extremely low; 40% low; 35% low/mod; 5% middle</p> <p>Acquisition of existing units: 250 Household Housing Units</p> <p>Permanent Supportive Housing units constructed: 250 Household Housing Units</p>

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Homeownership Program	2020	2024	Affordable Housing	City-Wide NRSA	Down Payment Assistance	CDBG: \$6,300,000	Loans Provided: 750 20% low; 75% low/mod; 5% middle income
4	Public Services Activities for Citizens of Detroit	2020	2024	Public Service Summer Youth Employment	City-Wide NRSA	Public Services Activities Job/Job Training	CDBG: \$14,167,640 CDBG: \$7,500,000	Public Service activities: 118,635 Person assisted 4,000 Youth assisted
5	Econ Dev (Creation/Retainage of Jobs/Small Businesses)	2020	2024	Non-Housing Community Development	City-Wide NRSA Areas	Economic Development Jobs/Small Business	CDBG: \$7,500,000	Businesses assisted: 150 Jobs created and/or retained
6	Sustain Infrastructure and Public Improvements	2020	2024	Non-Housing Community Development	City-Wide	Public Improvement & Infrastructure	CDBG: \$7,500,000	Other: 4,500 residents of LMA served
7	Public Facilities and Improvements	2020	2024	Non-Housing Community Development	City-Wide	Public Facilities	CDBG: \$5,000,000	Other: 15 Public Facilities 4,500 residents of LMA served 1,200 community benefit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Econ Dev (Commercial Rehab)	2020	2024	Non-Housing Community Development	City-Wide	Jobs/Small Business	CDBG: \$5,000,000	Businesses assisted: 50 Commercial Façade/Businesses Assisted
9	Blight removal and demolition	2020	2024	Demolition	City-Wide	Demolition Clearing Acquisition of Existing Units	CDBG: \$5,130,220	Buildings Demolished: 150 Structures (includes schools, commercial and residential properties)
10	Section 108 Repayment	2020	2024	Non-Housing Community Development	City-Wide	Economic Development	CDBG: \$15,637,235	Businesses assisted: 11 Businesses Assisted
11	Help those with special needs (non-homeless)	2020	2024	Non-Homeless Special Needs	City-Wide	Public Services Homeless Prevention	HOPWA: \$14,515,675	HIV/AIDS Housing Operations incl Tenant-based rental assistance: 1250 Household Housing Units
12	Other: Relocation	2020	2024	Non-Housing Community Development	City-Wide	Relocation of Displacement residents	CDBG: TBD	Number of individuals or households TBD Persons or Households Assisted
13	Other: Residential Historic Preservation	2020	2024	Housing Rehabilitation	City-Wide	Rehabilitation of Existing Units	CDBG: \$3,000,000	Number of individuals or households TBD Persons or Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
14	Other: Interim Assistance	2020	2024	Non-Housing Community Development	City-Wide	Emergency conditions threatening health and safety	CDBG: \$ TBD	Number of individuals or households TBD Persons or Households Assisted
15	CDBG Planning and Administration	2020	2024	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	City-Wide	N/A	CDBG: 34,525,650	Other
16	CDBG Housing Rehabilitation Activity Delivery Cost	2020	2024	Affordable Housing	City-Wide	Rehabilitation of existing owner-occupied units Increase in affordable rental housing options Increased homeownership opportunities	CDBG: 15,356,930	Other

Table xx – Goals Summary

Goal Descriptions

1	Goal Name	Reduce homeless citizens in City of Detroit
	Goal Description	Homeless outreach, Emergency shelter, transitional housing, and homeless prevention.
2	Goal Name	Rehabilitation of Existing Housing Units
	Goal Description	Affordable Housing units; rehabilitation of existing units Rental assistance, production of new units. Rehabilitation of existing units, rapid re-housing. Zero interest loan program, SEHR, Lead
3	Goal Name	Homeownership Program
	Goal Description	Down Payment Assistance
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 and creation of jobs, provide 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	Relocation
	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

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 identified by Detroit Future City and Investment Strategy initiatives. 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.

In addition to HOME program listed above HRD will continue to utilize approximately \$2.1 million of reprogrammed CDBG funds and program income from the Neighborhood Stabilization Programs 1 and 3 to develop 65 rental units.

In addition to HRD's initiatives the DHC is committed to providing quality, affordable housing for low and moderate-income persons. DHC will issue about 6,000 Housing Choice Vouchers under the Section 8 Program over the next 5 years and make available approximately 3,600 housing units for families and the elderly.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

N/A. No Section 504 Voluntary Compliance Agreement.

Activities to Increase Resident Involvement in management and participation in homeownership

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) to assist with the PHA Annual Plan process. The Advisory Board is comprised of residents of all sixteen PHA communities. The role of the RAB is to assist the PHA in developing the PHA Plan and in making any significant amendments or modifications such as Capital Improvement plans, Development plans, and policy or process changes to both the Low Income Public Housing and Housing Choice Voucher programs. The ongoing participation of the Resident Advisory Board, as well as participation by DHC's Resident Councils, covering 11 of 16 Communities, is a critical means of information sharing and provides the PHA and its residents with a forum to communicate and collaborate in the Agency's Annual Plan process.

To assist in the preparation of residents to become Home Ownership ready, the DHC has partnered with several HUD certified non-profit organizations providing programs such as 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. Recognizing that increased employment opportunities inherently increases opportunities for homeownership, the Detroit Housing Commission's Resident Services Department (RSD) assists public housing residents with job training and job placement with local employers using various resources such as the ROSS, FSS, and CSSP to provide a pathway to economic self-sufficiency for residents.

Over the 5-year term of the Consolidated Plan, the Resident Services Department will continue working to expand services offered to residents through the creation of outside partnerships with community service providers and the pursuit of additional funding sources such as those listed above.

Is the public housing agency designated as troubled under 24 CFR part 902?

No.

Plan to remove the 'troubled' designation

N/A

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

Public policies can act either as barriers to affordable housing or can serve to promote it. Recognizing this and remaining cognizant of the negative effect public policies can have on housing affordability, the City of Detroit does not impose limitations such as growth controls, impact fees, exclusionary or large lot zoning requirements, or rent controls; all of which can present barriers to affordable housing. The City Planning Commission has recently undertaken a significant update to the City zoning ordinance, known as [Zone Detroit](#), to seek ways to ensure zoning laws are flexible, inclusionary and considerate of changing times and communities.

With the combined effects of a significant population loss, the recent housing crisis, and a significant number of vacant and dilapidated properties; decent, safe, and affordable housing options have decreased for many Detroit residents. Because homeownership remains out of reach for a sizeable portion of the population, the demand for affordable rental housing within the city is great. At the same time, the amount of affordable rental housing is limited. Public housing, the source of Detroit's largest number of affordable rental units, only provides an estimated 9,800 units, including voucher units. With a waiting list more than 9,000 or more, the need for affordable units is critical. Because of this, in 2017 the City adopted an affordable housing ordinance requiring residential developers receiving certain subsidies or donated land from the city to offer 20 percent of their rental units to households at or below 80% AMI.

There are several other factors, some outside of the City's control, acting as barriers to affordable housing. Some of these include:

- Lack of financial resources to build affordable housing (i.e. lending institutions willing to invest in Detroit)
- Policies that promote urban sprawl
- Higher housing tax rates
- Higher insurance rates compared to nearby suburban areas
- Predatory lending practices
- Crime/perceived crime (deterrent to investing in Detroit)
- Decreased funding in CDBG/HOME and other federal funding sources
- Aging housing stock in Detroit requiring higher maintenance costs

The City commissioned the Center of Urban Studies at Wayne State University to prepare a HUD required Assessment of Fair Housing in 2018. The report noted that "investing in particular neighborhoods has occurred with private investments, as well as public and charitable investments that have focused on stabilizing neighborhoods in an urban triage approach rather than prioritizing spending in neighborhoods that continue to struggle and decline."¹⁶ The study went on to further explain the impact of the

¹⁶ Assessment of Fair Housing – City of Detroit prepared by Wayne State University/Center for Urban Studies, page 114

investment approach on decreasing property values in some neighborhoods and increasing development pressures in others leading to gentrification and relocation of low-to moderate-income households. The report identified lack of public investments in specific neighborhoods as contributing to disparities in access to affordable housing opportunities. An older housing stock, foreclosures, and deferred maintenance by elderly and low-income households or landlords unwilling to invest in property improvements result in poor housing conditions. The need to aggressively enforce housing and building codes to ensure environmental health and safety and increase the quality of housing available to residents was also highlighted. Maintaining and increasing participation in regional fair housing initiatives that improve access to opportunities and address disparities for Detroit residents was encouraged. One of the advocacy issues for regional participation is transportation access to suburban jobs and improving practical access to proficient schools.

The segregation of affordable housing from market-rate housing in new developments was cited in focus groups and recommendations were made for the City to expand its work with developers to improve affordable housing and its integration in rapid growth areas such as Downtown and Midtown. Complaints included disruption to seniors due to new developments in Downtown and Midtown where seniors were unable to afford increased rents or evicted to make way for condo conversions or new developments. Increases in fair housing complaints from these two areas suggested the need for more oversight to determine if segregation was intentional or unintentional.

As a result of the study, a fair housing action plan with goals and priorities was developed. The goals were outreach to increase awareness of fair housing laws; enforcement of housing and building codes; work with other jurisdictions to improve access to opportunity for residents; work with developers to improve quantity and quality of affordable and accessible housing including for homeownership and the elderly. The implementation of the actions and goals will be monitored by HRD staff with support from the Detroit Housing Commission, Fair Housing Of Metropolitan Detroit and Fair Housing Center of West MI, City of Detroit Building Safety Engineering and Environmental Department, and City of Detroit Civil Rights, Inclusion & Opportunity Department (CRIO) (formerly Human Rights). The actions taken and the impact of the strategies will be documented and reported on the City's annual Consolidated Annual Performance and Evaluation Report (CAPER). HRD staff will include standards and procedures to address fair housing issues and goals in its monitoring policies and procedures.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The City of Detroit is implementing policies aimed at ameliorating the negative effects of some of the public policies described above and is prioritizing investment both geographically and strategically to alleviate some of the concerns noted in the 2018 Assessment of Fair Housing (AFH). Specifically, through the Consolidated Planning process, the City has identified the following strategic priorities in allocating public funds:

- The City intends to renew its five Neighborhood Strategy Areas (NRSAs) to focus investment on neighborhoods that meet the NRSA criteria. The NRSAs include many of the areas in the City with

the highest vacancy rates and offer significant opportunities to leverage public and private sector investment for increased housing choice and economic opportunity for area resident. The City of Detroit has five objectives it is trying to achieve through the NRSAs; Stabilize neighborhoods; Support small businesses; Create jobs; Create summer youth employment; and B build wealth.

- In 2017 the City adopted an Inclusionary Housing Ordinance requiring residential developers receiving certain subsidies or donated land from the city to offer 20 percent of their rental units to households at or below 80% AMI.
- New unit construction, housing rehabilitation, demolition, and rental assistance have all been identified as high priorities for funding and will serve to both stabilize neighborhoods and increase the economic vitality of identified investment areas.
- Where possible, the City will strategically target financing and tax incentives to encourage the development of decent, safe, and sanitary housing that is affordable to LMI households.
- The City will continue to provide funding through grants and loans to existing homeowners to improve their properties
- Work with local lenders to ensure lending practices do not create barriers to homeownership.
- Coordinate City efforts with those of other local and regional governments, housing professionals, and transportation agencies to coordinate housing and transportation opportunities.
- The City developed a multi-family housing strategy which goals will address barriers to affordable housing. As an action item from the strategy, the City established the Detroit Affordable Housing Leverage Fund (AHLF) in 2019 using Local Initiatives Support Corporation, a local community development financial intermediary. The AHLF seeks to leverage CDBG, HOME, MSHDA 4 percent tax credits, and private flexible capital from financial institutions and foundations to develop affordable housing in the City. This strategy addresses one of the most significant barriers to affordable housing that of affordable financing, subsidies, and patient capital. The fund is projected to use \$50 million of City funds (CDBG, HOME, etc.) to leverage \$125 million in private capital and \$75 million in MSHDA initially and will ultimately preserve 10,000 units of existing affordable housing and develop 2,000 units of new affordable housing. These activities will increase the quantity and quality of the affordable housing stock in the City of Detroit.

SP-60 Homelessness Strategy – 91.215(d)

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

Since the submission of the last 5-year Consolidated Plan, the City of Detroit, in collaboration with the Detroit CoC (MI-501) has fully implemented its strategy to reach out to and assess persons who are experiencing homelessness through the use of the Coordinated Assessment Model or CAM. CAM provides a uniform and streamlined process by which people who are homeless or at risk of homelessness are assessed for the most appropriate intervention to meet their needs based on their situation, and provided referrals to agencies within the CoC best suited to address those needs.

Using the Coordinated Access Model, persons who are homeless, be it sheltered or unsheltered, receive an assessment using a common tool known as the Service Prioritization Decision Assistance Tool or SPDAT. This tool is used to determine what level of intervention uniformly and reliably is most appropriate. Based on assessment results, the most appropriate level of assistance, be it short-term Rapid Rehousing Assistance (RRH), longer term Permanent Supportive Housing Assistance (PSH), or no assistance for those that can move from homelessness on their own. Based on this assessment, the person or family is referred to an appropriate service provider within the CoC.

These SPDAT assessments occur within emergency shelter settings as well as on the street for persons who are unsheltered. All of the street outreach programs within the Detroit CoC have been trained in the use of the tool and complete the assessments on persons they encounter on the street or in other locations where homeless persons may frequent, with both the shelter and CAM staff conducting the assessments.

The CAM also coordinates placement into emergency shelter for persons needing this service. This coordination helps to ensure persons are placed into the shelter best suited for their needs and that shelter capacity is fully utilized.

Addressing the emergency and transitional housing needs of homeless persons

Detroit addresses the emergency and transitional housing needs of homeless persons through the following activities:

- Emergency Shelters- There are currently four different emergency shelter providers in the Detroit CoC. Some of these shelters are specifically targeted to youth, veterans, or victim of domestic violence.
- Warming Centers - There are three seasonal emergency shelter programs that are opened to provide additional shelter space for homeless persons during the cold weather months.
- Rapid Re-housing (RRH) Programs - To facilitate the rapid transition from homelessness back into housing, Detroit uses ESG funding from both the City of Detroit and the State of Michigan to

provide RRH assistance. RRH offers short to medium term rental assistance and services to quickly move individuals and families from homelessness to housing. This same program is offered to Veterans and their families using Supportive Services for Veterans Families (SSVF) funding.

- Homeless Prevention - Detroit also uses ESG funding (both City and State) to provide prevention assistance for persons at risk of homelessness. Prevention funds are available to pay rental or utility arrearages, security deposits and/or limited rental assistance for persons needing to move to a new housing unit. As with RRH activities, SSVF funding is available to provide these same prevention services for Veterans.

There are currently 4 Continuum of Care funded Transitional Housing (TH) programs in Detroit. Since the submission of the 2015 -2019 Consolidated Plan when the CoC funded 19 TH programs, and in compliance with HUD's emphasis on Permanent Housing over Transitional Housing, the CoC has reallocated all but four (4) of these programs to new Permanent Supportive Housing (PSH) or Rapid Re-Housing (RRH) activities. While some level of transitional housing will likely always be needed, the Continuum of Care will continue to make strategic funding decisions based on both its internal and HUD's priorities, and funding may continue to be reallocated to activities determined to be more effective in reducing homelessness

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.

Research continues to demonstrate that, in many cases, the most effective intervention for chronically homeless persons is permanent supportive housing (PSH). PSH provides a permanent rental subsidy and wrap-around services for those with significant barriers to housing.

The Detroit Continuum of Care (CoC) continues to address the needs of chronically persons by targeting a portion of the community's CoC funded PSH resources specifically to those who are chronically homeless. Since the submission of the City's last 5-year Consolidated Plan in 2015, the CoC has reallocated all but four (4) of its TH programs to new PSH or RRH projects. In all, 12 TH programs totaling \$4,359,787 were converted to PSH/RRH activities. Three additional TH projects were not reallocated, but rather were not selected by HUD for funding. As with other forms of homeless assistance, persons are assessed for PSH through the CAM process using the SPDAT tool. Persons are prioritized for placement into PSH based on the greatest level of need for housing.

Veterans:

The need of veterans and their families are addressed in through a variety of programs, including housing resources from both HUD and the Veterans Administration. These resources include:

Supportive Services for Veteran Families (SSVF); SSVF provides both rapid re-housing (RRH) and prevention assistance for veterans (both single and veterans with a family). RRH provides short to medium term rental assistance and services to quickly move homeless Veterans back into housing. Prevention assistance is available to Veterans who are at-risk of homelessness to pay rental or utility arrearages, security deposits, and/or limited rental assistance to move to a new housing unit. There are currently 4 SSVF funded programs in Detroit.

HUD-VASH: HUD -VASH is a permanent supportive housing program funded by both HUD and the Veterans Administration (VA). The program provides a permanent housing subsidy for homeless veterans through HUD's voucher program, and wrap around services provided by the VA, to help them maintain their housing status.

Grant Per Diem Transitional Housing (GPDTH); The VA currently funds more than 300 grant per diem transitional housing beds in Detroit. These beds provide transitional housing assistance to homeless veterans, the majority of whom are single individuals. The intent of the GPD TH program is to stabilize these individuals before moving them into permanent housing.

Families with Children

The needs of families with children are addressed in the following ways:

- A portion of the emergency shelter and transitional housing beds in Detroit are specifically targeted to families with children. Families with children are also a targeted population for ESG funded rapid re-housing.
- The Detroit CoC reallocated a CoC funded Supportive Services Only (SSO) grant to a new Rapid Re-housing for families programs, provided \$880,000 in funding for 60 units of RRH for homeless families. The project began operations in calendar year 2015 and has been fully operational since. ES and CDBG funding are also utilized to support RRH efforts in Detroit.
- Families with children may also be served through the community's existing prevention assistance programs.

Unaccompanied Youth

The needs of accompanied youth are addressed in the following ways:

- There are currently three emergency shelters and four transitional housing programs within the CoC that are targeted to youth. Of these TH programs, three can accommodate pregnant or

parenting teens. In addition to these programs, another organization provides outreach, a drop-in center, and supportive services to LGBTQ youth.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

Recognizing that one of the best ways to reduce homelessness is to prevent it from occurring in the first place, the City of Detroit, in conjunction with the Detroit CoC and other City and State agencies, provides funding and logistical support to help LMI residents avoid becoming homeless upon discharge from public institutions or public assistance programs. This is accomplished through a variety of efforts, including the following:

Financial Assistance - Short-term leasing assistance and utility and/or rental arrears payments may be available. using Emergency Solutions Grant (ESG) funds for Rapid Re-Housing or Prevention assistance.

Preventing discharge into homelessness: The City of Detroit has worked with other relevant institutions in developing discharge policies to ensure those exiting jails, institutions of care, or the foster care system do not exit into homelessness. These efforts include:

Youth aging out of foster care: The Michigan Department of Human Services has implemented formal protocols to ensure that youth "aging out" of foster care are not discharged into homelessness, including if necessary, their discharge into McKinney-Vento funded programs.

Persons exiting a health care institution: Many people that are discharged from hospitals can return to their prior housing, which may include their own or a shared residence. Others who require continued medical care are discharged to nursing facilities or Adult Foster Care homes. When neither of these options is available, the CoC works with healthcare facilities to ensure that proper supportive housing is available for those being discharged to the community at large.

People exiting a mental health institution: Often, people being discharged from mental health institutions are discharged into transitional living programs, Adult Foster Care homes, or independent living situations. With lack of income presenting a significant barrier making it difficult for people with disabilities to access housing, the CoC and the Michigan Dept. of Community Health have implemented the Supplemental Security Income/Social Security Disability Income (SSI/SSDI) Outreach, Access and Recovery (SOAR) initiative. Under this initiative, providers have staff who are trained to help people gain the benefits for which they qualify in an expedited manner.

Persons exiting a prison: The Michigan Prisoner Reentry Initiative (MPRI) is the Department of Corrections' (MDOC) initiative to better prepare and support citizens following their release from prison. MDOC policy directives require that reentry plans must address housing upon release.

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.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

As a part of the Emergency Home Repair Program, HRD will continue to provide lead hazard control services to low-income residents. With the assistance of funding from HUD's Office of Healthy Homes and Lead Hazard Control, as well as CDBG entitlement funding, this program provides lead remediation to income eligible households receiving home rehabilitation or repair. The City's zero interest Home Repair Loan Program which is administered by the Detroit Local Initiatives Support Corporation (LISC) also includes federal CDBG and private loan capital that addresses lead based paint conditions.

The target population for lead abatement services is households with children under the age of six (6) years or where a pregnant woman resides. The eligible properties are single family structures and rental property containing no more than four (4) dwelling units. The grant will also identify and address, if possible, other existing health and safety issues through the Healthy Homes Rating System. This system rates hazards for their potential to harm residents and ensures those hazards are removed or minimized. The City expects to complete a total of 1,435 housing units through abatement or interim control over the next five years in all its programs.

The Detroit Department of Health also administers the Childhood Lead Poisoning Prevention Program (CLPPP). The program's goal is the prevention of childhood lead poisoning, case management of children with elevated blood levels and remediation of lead hazards in the home. To successfully accomplish their goals, CLPPP:

- 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.

The Detroit Lead Partnership meets on a monthly basis with multiple partners across the city and the Southeast Michigan region to work on a variety of lead prevention issues including, but not limited to, enforcement, service delivery, lead education, and lead-safe housing.

In 2016, the Detroit Water and Sewerage Department (DWSD) launched its part of the citywide Lead Safe Detroit program, establishing Lead Safe Standard Operating Procedures and an internal workgroup committed to helping reduce lead sources in drinking water. In 2018, DWSD began replacing lead service lines during water main replacement.

In 2019, HRD was awarded its 5th Lead Hazard Reduction Demonstration Grant from Office of Lead Hazard Control and Healthy Homes (OLHCHH) covering a 42-month period that began April 1, 2019 and ends

September 30, 2022 with the closeout period until December 31, 2022. The target accomplishment is to reduce lead hazards in approximately 200 housing units in which children under the age of 6 resides. In 2018, 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 30 units. In October 2019, HRD was also award \$9.7MM from HUD's OLHCHH 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).

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

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

How are the actions listed above related to the extent of lead poisoning and hazards?

Based on American Community Survey (ACS) data (2013-2017) approximately 96 percent of Detroit's existing owner-occupied and 86 percent of renter-occupied housing stock was built 1979 or before with 60 percent and 49 percent respectively being built before 1950. With the predominance of these older housing units, particularly in lower income areas, lead based paint continues to be an issue contributing to learning disabilities and other significant health issues among children who live in these homes.

According to the Detroit Health Department, the number of children with elevated blood levels (EBLLs) in Detroit has decreased by about half since 2009. This decline is likely due in large part to the abatement efforts and outreach and education services like those described above, as well as the removal of lead contaminated homes through demolition. However, because lead poisoning remains a challenge among children under six in Detroit, the need for these programs remains critical to overall community health.

How are the actions listed above integrated into housing policies and procedures?

In 2010 the City of Detroit passed a Lead Clearance Ordinance. Owners of rental property built before 1978 in the City of Detroit must have a lead inspection and risk assessment performed to determine the presence of lead base paint hazards. If lead based paint hazards exist, the hazards must be reduced or controlled using interim controls and/or abatement prior to a tenant occupying the rental property.

Additionally, HRD incorporates lead testing into its housing rehabilitation and repair programs when children under age 6 reside in the home receiving assistance. Any necessary remediation or abatement services are then performed as part of the rehabilitation assistance being received.

The Detroit Health Department has developed a coalition of city and community partners to coordinate childhood lead prevention and removal efforts throughout the City. This coalition, called “Lead Safe Detroit”, provides health services and lead education, removes hazardous lead sources in homes, conducts school and home water testing, improves compliance of rental owners, and strengthens environmental standards for lead.

Members of the coalition include: The Detroit Health Department (DHD), Detroit Land Bank Authority (DLBA), Detroit Building Authority (DBA), Buildings Safety and Engineering Department (BSEED), Housing and Revitalization Department (HRD), Detroit Water and Sewerage Department (DWSD), Detroit Public Schools Community District (DPSCD), Great Lakes Water Authority (GLWA), Detroit Housing Commission (DHC), Clear Corps Detroit, and Wayne State University’s Green and Healthy Homes Initiative.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

Detroit's anti-poverty strategy focuses on moving residents out of poverty through access to affordable housing, increased levels of education, better access to transportation, increased job opportunities, and higher wage earnings for LMI residents.

Many individuals and families at poverty level face a significant housing cost burden in the Detroit area. A cost burden occurs whenever 30 percent or more of income is spent on housing. The most recent ACS data (2018) lists the median household income in Detroit at \$31,283, meaning an affordable rent would be about \$780. The current FMR rate for a 2-bedroom unit in Wayne County is \$977, almost \$200 per month higher. This creates a critical need for additional affordable units.

While the Detroit Housing Commission (DHC) can provide an estimated 3700 public housing units and another 6,000 Section 8 vouchers, there remains a need for other housing resources to address this gap. The City of Detroit uses CDBG and ESG funds to prevent homelessness and assist those that are already homeless with shelter and supportive services. HOME and CDBG funds are also used to construct affordable rental housing, assist with down payments to make homes affordable, and rehabilitate homes for low- and moderate-income persons in Detroit.

While the need for CDBG public services funding greatly exceeds Detroit's annual CDBG allotment, funding for educational, employment and transportation programs remains a top priority for the City. The City regularly allocates its full 15% allotment of CDBG funds for public service activities throughout the City of Detroit. These services include education and job training services and services for seniors (including better access to transportation). The City also allocates a portion of its annual CDBG funds to Economic Development projects aimed at creating or retaining businesses to provide increased employment opportunities for area residents.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan?

As a HUD entitlement grantee, Detroit enforces federal regulations that seek to generate economic opportunity and sustainable wages, such as Davis-Bacon wage requirements, Minority and Women-owned business requirements, and Section 3 of the National Affordable Housing Act. The Section 3 program requires that certain recipients of HUD financial assistance provide job training, employment, and contracting opportunities for local LMI residents in projects in their neighborhoods. Proper implementation and enforcement of these regulations provides for increased opportunity and higher wages to HUD assisted residents, thereby increasing their chances of moving out of poverty

Detroit uses a combination of its CDBG, HOME, ESG, and HOPWA funding, along with funding from the State of Michigan and local public and private sector funding, to provide a variety of affordable housing

programs. CDBG funding is used to rehabilitate existing homes while HOME is used to construct new housing or rehabilitate properties to develop affordable rental units. ESG is used to prevent homelessness and assist those that are already homeless with shelter and supportive services. HOPWA addresses housing problems faced by those struggling with an HIV/AIDS diagnosis.

Detroit also uses its available CDBG public service dollars to fund activities and programs designed to move people out of poverty through increased educational and employment opportunities and better access to transportation.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the grantee will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements.

All applicants, sub-recipients, for-profit and not-for-profit partners receiving funds through HUD's Community Planning and Development formula grant programs contained in this Plan are responsible for complying with all program regulations and other federal requirements. The objectives of the City's monitoring standards and procedures are to: 1) ensure uniformity and efficiency in the administration and delivery of CPD program projects and activities; 2) ensure full compliance with federal, State and local statutory and regulatory requirements for the Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), Emergency Solutions Grant (ESG) and Housing Opportunities for Persons with HIV/AIDS (HOPWA) programs; 3) minimize and eliminate compliance issues; and, 4) build and strengthen the capacity through training and technical assistance of City partners.

The Housing & Revitalization Department (HRD) is the responsible agency for ensuring compliance with all regulatory and statutory requirements relative to Community Planning and Development awards for the City of Detroit. Subrecipient contracts and service-level agreements are executed with partner agencies to facilitate programmatic activities. The agreements detail assigned responsibilities and performance measures to establish accountability standards. A monitoring strategy is used to assess Subrecipient performance and program effectiveness. Also, more effective work standards and protocols were established to thwart and mitigate challenges that could impede successful program performance. To be more strategic in our efforts and maximize available resources, risk assessments are applied to draft monitoring plans. Risk analyses target attention to program activities and participants that represent the greatest risk and susceptibility to fraud, waste, and mismanagement. Once the level of risk is determined for each Subrecipient, the appropriate monitoring strategy is implemented.

HRD's monitoring plan involves a collaborative approach of programmatic and financial monitoring. HRD's program staff is responsible for monitoring the programmatic efforts of our Subrecipient's and service partners. Each project is assigned a dedicated program manager to complete an initial assessment of each contract award and facilitate programmatic monitoring of all Subrecipient activities as defined in the executed agreement. The City of Detroit's Office of Chief Financial Officer (OCFO) is assigned to conduct financial monitoring of covered activities. As the project advances, each organization is further evaluated for performance and effectiveness. This information is considered when determining future awards, as well. Below are more specific monitoring processes for HRD programs and activities.

Due to the 2020 coronavirus pandemic, onsite monitoring has been suspended for FY 2020 -2021 and replaced by desktop reviews.

COMMUNITY DEVELOPMENT BLOCK GRANT

Scheduled Program Monitoring: Once a subrecipient has been identified for an on-site program monitoring, a monitoring date is established with the subrecipient. A formal written letter is forwarded to the organization at least two (2) weeks prior to the scheduled visit (where possible), confirming the

meeting date, purpose, as well as advising of specific documents, processes and areas subject to review. During this visit, staff will verify that the programs outlined in the contract scope are being carried out as described in the agreement, as well as review documentation, conduct interviews with staff, and complete site inspections. The HRD staff conducting the program monitoring shall inform the Subrecipient of any program findings and/or concerns within thirty (30) days after the conclusion of the monitoring visit.

EMERGENCY SOLUTIONS GRANT

The Housing & Revitalization Department (HRD) is the City of Detroit department responsible for ensuring compliance with all regulatory and statutory requirements relative to ESG and CDBG Homeless Public Service funding. Therefore, it is incumbent upon the HRD staff to ensure Emergency Solutions Grant funds or those specifically delineated as match are spent on time and in compliance with all regulatory, statutory, and mandates outlined in the subrecipient agreements. Housing and Revitalization staff also ensure adherence to the Continuum of Care's written standards and City of Detroit Policies and Procedures.

HOME INVESTMENT PARTNERSHIP

The Program Administrator (PA) for the HOME Investor Compliance Monitoring implements required guidelines and procedures to monitor, review and perform scheduled on-site inspections of HOME-assisted rental housing to determine compliance with household housing costs, household income guidelines, and Section 8 Housing Quality Standards (HQS), and procedures to comply with post-rehabilitation lead-based paint activities for rental properties rehabilitated using HOME funds. The PA schedules a compliance monitoring, necessary to complete compliance monitoring requirements on all HOME-assisted units. The PA submits a HOME Compliance Monitoring schedule to HRD management for review and approval. Staff will conduct a site inspection of rental units for HQS compliance and compliance with HUD's Lead-Based Paint Regulations for projects rehabilitated using HOME funds. HRD staff reviews the HQS report and notify owners of compliance or non-compliance. Review all leases of HOME-assisted units to ensure leases are following the Affordable Housing Restriction document executed at loan closing.

HOPWA

The Detroit Health Department monitors the HOPWA contract and Southeastern Michigan Health Association (SEMHA) staff administer the HOPWA program and assures program quality management with fiscal and program monitoring. Staff complete and monitor all leases of HOPWA assisted units to ensure compliance and conforms to the Housing Quality Standards (HQS) procedures for properties funded through HOPWA. Recertification occurs once per year on client's anniversary date, with staff monitoring households 3 times per year based on individualized housing plans.

The City's monitoring process involves an established system of continuous communication and evaluation that begins with negotiating individual contracts/agreements with selected subgrantees (subrecipient) that include measurable performance standards and are consistent with and inclusive of all

HUD guidelines and requirements. These include items such as: budgets, performance timelines, productivity measures, financial records and audits, reporting, program income, uniform administrative requirements and program management standards, equal opportunity requirements, labor standards, causes of default/termination and reversion/disposition of assets.

Each year, HRD make site visits to monitor its partners and subgrantees to ensure uniformity and efficiency in the administration of the CDBG/HOME/ESG/HOPWA programs. On-site monitoring examines the subgrantees financial systems and controls, procurement, cost reasonableness of activities, program income, national objectives/income eligibility of participants, record retention, overall management systems, Section 3, MBE/WBE, project progress, as well as other cross-cutting federal regulations.

Results of monitoring reviews will be communicated in writing to the sub-recipient/agency and will include any non-compliance issues and corrective recommendations for achieving compliance, if warranted. If a problem persists, sanctions may be imposed appropriate to the scale of the problem. When deemed necessary, sub-recipients may be required to attend applicable HUD and/or HRD provided training as part of the corrective action process.

In addition, Local Initiative Support Corporation (LISC), expedites and coordinates the efforts of non-profits, private groups, and government in providing affordable housing through their administration of the Detroit Affordable Housing Leverage Fund (AHLF). As a CDBG subrecipient LISC is subject to the monitoring requirements outlined in 2 CFR 200.330-200.331 and therefore responsible for monitoring the agencies that are under subrecipient agreement with LISC. LISC has developed monitoring policies and procedures for monitoring non-profit intake centers and local community development financial institutions (CDFIs) that process and service the home repair loans. HRD staff will use these mechanisms and develop other coordinating mechanisms including periodic contact with various agencies involved in the process to ensure that the Monitoring Plan is implemented in a timely and efficient manner.

Minority Outreach Program – HRD’s bid procedures model those procedures used by the City’s Office of Contracting and Procurement for general City bids and promotes opportunities for Minority Business Enterprise (MBE)/Women Business Enterprise (WBE). HRD conducts forums and informational meetings to recruit and retain qualified contractors.

Comprehensive Planning Requirements – Extensive study, research and planning serve as the City’s background related to strategic efforts to improve low-income and blighted areas of the City. As a part of the City’s 2015-2019 Consolidated Plan submission, five Neighborhood Revitalization Strategy Areas (NRSAs) and three Slum/Blighted target areas were identified and approved by HUD. These designations were based on data from the Hardest Hit Program and an extensive community consultation process with the objective of transforming these areas to thriving, productive, high-quality-of-life neighborhoods. Resources directly from funding contained in this Plan are combined with other federal, state, and local funds to achieve these goals. Activities undertaken within these areas are monitored through in-house and project reviews to ensure long-term compliance with environmental standards, lead-based paint, acquisition/disposition and relocation, Section 504 and other Fair Housing standards including Affirmative

Marketing, Affirmatively Furthering Fair Housing. Efforts to educate all parties as to the significance of these federal rules and the ramifications of non-compliance continue to take place in these areas.

Fair Housing Issues

The City conducted a HUD required Assessment of Fair Housing in 2018 and established a set of fair housing goals and priorities to be implemented through 2024. The goals were outreach to increase awareness of fair housing laws; enforcement of housing and building codes; improve access to opportunity; and improve quantity and quality of affordable and accessible housing. The fair housing action plan will be monitored by HRD staff with support from the DHC, local and regional fair housing agencies, the City's Building Safety Engineering and Environmental Department, and Civil Rights, Inclusion & Opportunity Department (CRIO). The actions taken and the impact of the strategies will be documented and reported on the City's annual CAPER. HRD staff will include standards and procedures to address fair housing issues and goals in its monitoring policies and procedures.

NRSA Monitoring

The City plans to submit a renewal application for its Neighborhood Revitalization Strategy Area (NRSA) designation. The City must identify and document the results expected to be achieved by the NRSA strategy as well as leverage from non-federal sources received and used to support the NRSA. In compliance with NRSA requirements in HUD Notice CPD-16-16 issued September 2016, HRD staff will take the following steps:

First, measurable, and specific NRSA goals and objectives will be established to reach desired outcomes and track progress. Second, each Annual Action Plan shall identify the activities the City will fund to carry out the NRSA strategy and the targeted achievements expected for the program year. Third, HRD staff will enter at least semi-annually, activity data correctly into IDIS which will be reported in the PR84 report: the "CDBG Strategy Area, CDFI, and Local Target Area Report." Fourth, report actual outputs and outcomes and a narrative update on the NRSA progress in the CAPER including:

- continuing stakeholder involvement
- activities addressing identified housing and economic opportunities
- progress on achieving identified outcomes through reported accomplishments
- documentation that leveraged resources received and used for their intended purposes

HRD will provide training and reporting tools for the non-profit agencies and City department personnel involved in implementing the NRSA strategies.

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 the last fiscal year, the City did receive a total of \$215,827 in loan settlements. The HOME Program Income last fiscal year was 1,931,510 and 1,000,000 in returns, totaling \$2,931,510 available in the 2020-21 fiscal year. Also, the city is expected to receive approximately 1,161,582 of revolving loan proceeds from the 0% interest loan home repair program. These proceeds will be invested back into the program. The 2020 Fiscal Year awards are shown below:

Program	2020 Award
CDBG	\$35,282,359
HOME	\$ 7,268,033
ESG	\$3,032,870
HOPWA	\$ 2,903,135
Total	\$48,486,397

Based on the above allocations, the City of Detroit is expected to receive a total of \$48,490,753 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 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services Historic Preservation	35,282,359	0	1,161,582	36,443,941	141,129,436	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	7,268,033	1,931,510	1,000,000	10,199,543	29,072,132	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.
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Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	2,903,135	0.00	0	2,903,135	11,612,540	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 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	3,032,870	0.00	0	3,032,870	12,131,480	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 1				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 1				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 1				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.

- **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. Before enactment of tax reform legislation at the end of 2017, there was also a 10 percent non-historic rehabilitation tax credit for pre-1936 buildings. These Federal tax incentives are used to stimulate private investment in the rehabilitation and reuse of historic structures.

- **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. The City provides funding for 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 through the City's Affordable Housing Leverage Fund (AHLF) which is administered by the Detroit office of Local Initiatives Support Corporation (LISC). See below.

In FY 2018, two housing projects that received 9% competitive LIHTC allocations were Pablo Davis II (\$451,066) and The Sanctuary (\$800,000). Three additional projects in the City received increased credits for existing LIHTC projects, The Anchor at Mariners Inn (\$1,300,000); Benjamin O. Davis Veterans Village, (\$1,178,471), and La Joya Gardens (\$811,553).

- **Bank of America and Quicken Loans/Local Initiatives Support Corporation**

Bank of America (BoFA) provides private capital through Local Initiatives Support Corporation, a national community development financial intermediary (CDFI) with a local office in Detroit, for the City of Detroit's 0% Home Repair Loan program. These private funds are matched dollar for dollar with the City's CDBG funding to provide necessary 0% interest home repair loans to eligible LMI homeowners citywide. In 2019, BoFA provided \$1.5 million in funding to this effort and as of March 2020, has provided a total of

\$6,700,000 in private capital to date. In 2019, Quicken provided \$1 million to support lead-based repairs, loan capital and administrative costs for the 0% Home Repair Program. In addition, Bank of America provided a \$1 million operating grant to “Invest Detroit” to support its expansion of the Strategic Neighborhood Fund (SNF).

- **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.¹⁷

- **The Preservation Housing Partnership**

The City of Detroit Housing & Revitalization Department (HRD) has partnered 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.

- **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) partnered 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

¹⁷ Strategic Neighborhood Fund. Retrieved September 23, 2020. <https://investdetroit.com/an-unprecedented-effort-to-strengthen-our-neighborhoods/>

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 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.

- **Choice Neighborhoods**

The City plans to apply for a HUD's Choice Neighborhoods Initiative (CNI) Implementation Grant due in December 2020. The Choice Neighborhoods program leverages significant public and private dollars to support locally driven strategies that address struggling neighborhoods with severely distressed public and/or HUD assisted housing through a comprehensive approach to neighborhood transformation. The proposed application involves the implementation of a comprehensive Transformation Plan in Greater Corktown 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. Given this context, the City engaged in an in-depth neighborhood planning process, to ensure that the Transformation Plan reflects the needs and priorities of existing residents. The vision for the neighborhood involves creating high-quality affordable and mixed income housing options, including opportunities for homeownership across the income spectrum, as well as targeted investments in neighborhood and people to support long-term stabilization. The full CNI housing plan aims to create approximately 900 new units, with more than 50% affordable to low-income residents with a mix of affordability levels. This includes the redevelopment of the 86 existing assisted units at Clement Kern Gardens as well as 40 new homeownership units. The development team will seek Housing Choice Vouchers to support this housing plan. HRD is coordinating the CNI application process and plans to support neighborhood and housing initiatives within the plan through CDBG and HOME investment.

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 2019, 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 2020 HOME funds as well and it is anticipated that 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 which 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 which 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 2015, several large philanthropic organizations, including The Bank of America Charitable Foundation, The Erb Family Foundation, and The Kresge Foundation have awarded over \$3.7 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 2016, DFC has awarded more than \$330,000 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 more attractive neighborhoods. Adaptive reuse projects through this program make use of DFC vacant land transformation designs published in the [DFC Field Guide to Working With Vacant Lots](#).

Discussion

See above.

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Reduce homeless citizens in City of Detroit	2020	2021	Homeless	City-Wide	Increase in affordable housing options Homeless Prevention Rental Assistance Homeless Outreach Emergency Shelter and Transitional Housing Rapid Re-housing	CDBG: \$2,458,824 ESG: \$3,032,870 CoC: \$26,137,973	Tenant-based rental assistance / Rapid Rehousing: 3,000 Households Assisted Homeless Person Overnight Shelter: 1,900 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 241 Beds Homelessness Prevention: 1,800 Persons Assisted Homeless Outreach: 515 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Rehabilitation of Existing Housing Units	2020	2021	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: \$7,269,293 CDBG: \$1,000,000 CDBG: \$6,500,000	Rental units constructed: 80 Household Housing units Homeowner Housing Rehabilitated: 400 Household Housing Units Rental Units rehabilitated: 400 Household Housing Unit Acquisition of existing units: 50 Household Housing Units Permanent Supportive Housing units constructed: TBD Household Housing Units

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Homeownership Program	2020	2021	Affordable Housing	City-Wide NRSA	Down Payment Assistance	CDBG: \$1,260,000	Loans Provided: 150 Household Housing Units Assisted
4	Public Services Activities for Citizens of Detroit	2020	2021	Public Service Summer Youth Employment	City-Wide NRSA	Public Services Activities Job/Job Training	CDBG: \$2,833,528 CDBG: \$1,500,000	Public Service activities: 23,727 Person assisted 800 Youth assisted
5	Econ Dev (Creation of Jobs/Small Businesses)	2020	2021	Non-Housing Community Development	City-Wide NRSA Areas	Economic Development Jobs/Small Business	CDBG: \$1,500,000	Businesses assisted: 30 Jobs created and/or retained
6	Sustain Infrastructure and Public Improvements	2020	2021	Non-Housing Community Development	City-Wide	Public Improvement & Infrastructure	CDBG: \$1,500,000	Other: 900 residents of LMA served

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Public Facilities and Improvements	2020	2021	Non-Housing Community Development	City-Wide	Public Facilities	CDBG: \$1,000,000	Other: 3 Public Facilities 900 residents of LMA served 400 community benefit
8	Econ Dev (Commercial Rehab)	2020	2021	Non-Housing Community Development	City-Wide	Jobs/Small Business	CDBG: \$1,000,000	Businesses assisted: 10 Commercial Façade/Businesses Assisted
9	Blight removal and demolition	2020	2021	Demolition	City-Wide	Demolition Clearing Acquisition of Existing Units	CDBG: \$1,026,044	Buildings Demolished: 30 Structures (includes schools, commercial and residential properties)
10	Section 108 Repayment	2020	2021	Non-Housing Community Development	City-Wide	Economic Development	CDBG: \$3,127,447	Businesses assisted: 11 Businesses Assisted
11	Help those with special needs (non-homeless)	2020	2021	Non-Homeless Special Needs	City-Wide	Public Services Homeless Prevention	HOPWA: \$2,903,135	HIV/AIDS Housing Operations including Tenant-based rental assistance: 250 Household Housing Units

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
12	Other: Relocation	2020	2021	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	2020	2021	Housing Rehabilitation	City-Wide	Rehabilitation of Existing Units	CDBG: \$3,000,000	Number of individuals or households TBD Persons or Households Assisted
14	Other: Interim Assistance	2020	2021	Non-Housing Community Development	City-Wide	Emergency conditions threatening health and safety	CDBG: TBD	Number of individuals or households TBD
15	CDBG Planning and Administration	2020	2024	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	City-Wide	N/A	CDBG: 6,905,130	Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
16	CDBG Housing Rehabilitation Activity Delivery Cost	2020	2024	Affordable Housing	City-Wide	Rehabilitation of existing owner-occupied units Increase in affordable rental housing options Increased homeownership opportunities	CDBG: 3,071,386	Other

Table ## – Goals Summary

Goal Descriptions

1	Goal Name	Reduce homeless citizens in City of Detroit
	Goal Description	Homeless outreach, Emergency shelter, transitional housing, and homeless prevention.
2	Goal Name	Rehabilitation of Existing Housing Units
	Goal Description	Affordable Housing units; rehabilitation of existing units Rental assistance, production of new units. Rehabilitation of existing units, rapid re-housing. Zero interest loan program, SEHR, Lead
3	Goal Name	Homeownership Program
	Goal Description	Down Payment Assistance
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	Relocation
	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

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 identified by Detroit Future City and Investment Strategy initiatives. 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.

In addition to HOME program listed above HRD will continue to utilize approximately \$2.1 million of reprogrammed CDBG funds and program income from the Neighborhood Stabilization Programs 1 and 3 to develop 65 rental units.

In addition to HRD's initiatives the DHC is committed to providing quality, affordable housing for low and moderate-income persons. DHC will issue about 6,000 Housing Choice Vouchers under the Section 8 Program over the next 5 years and make available approximately 3,600 housing units for families and the elderly.

AP-35 Projects – 91.220(d)

Introduction

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

Over seventy percent of HUD funds are targeted in geographic locations that aligns with other investments, taking advantage of community assets and advancing the restoration of distressed communities. It is a strategy born of necessity. In Detroit, the demand for services far exceeds available funding levels, and almost all Census tracts in Detroit are over 51 percent low to moderate income. Accordingly, the Action Plan and Public Housing Assistance used geographic targeting to be more strategic in making investments that will benefit low- and moderate-income people throughout the City. For Fiscal Year 2020-21, the projects are listed below:

Projects

#	Project Name
1	ADMINISTRATION AND PLANNING (ADM/PLN)
2	BLIGHT REMOVAL AND DEMOLITION (DEMO)
3	ECONOMIC DEVELOPMENT (ED)
4	HOUSING REHABILITATION HOME REPAIR (HR) & LEAD REMEDIATION
5	PUBLIC FACILITY REHABILITATION AND IMPROVEMENT (PFR)
6	HOUSING PRE-DEVELOPMENT COSTS/HOMEOWNERSHIP ASSISTANCE
7	HOMELESS PUBLIC SERVICE (HPS)
8	PUBLIC SERVICE (PS)
9	SECTION 108 LOANS (REPAY)
10	RESIDENTIAL HISTORIC PRESERVATION
11	RELOCATION
12	HOME Assisted Housing (HOME)

#	Project Name
13	ESG20 Detroit (2020)
14	HOPWA Administration. HOPWA grant administration activities

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 2020-21, 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

(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.

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 is applying to 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	79
Slum and Blight Areas	3
NRSA's	18

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 in process. 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 2.5 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. 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), HOME Investment Partnership Program (HOME), Emergency Solutions Grants (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) funds to assist the most vulnerable populations in our community including homeless and low/moderate income housing needs. CDBG and ESG funds help prevent homelessness and assist those that are already homeless with shelter and supportive services. HOPWA funding addresses affordable housing needs faced by those struggling with an HIV/AIDS diagnosis. HOME, CDBG and 108 Loan funds are used to build rental housing, help with down payments and rehabilitate homes for low- and moderate-income persons/families in Detroit. HOME funds will be used primarily for Rental Housing projects. The City may use a portion of HOME funds to assist with tenant-based rental assistance to combat the growing dislocation problem.

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 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 five 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 2020-2021 the City will continue to refine the process used to select housing rehabilitation and new construction projects (for example in geographically targeted areas of the City). HRD will continue to utilize the Targeted Multifamily Housing Areas Map to assist in making 2020-2021 HOME NOFA investment decisions. The City will seek to significantly leverage HOME, CDBG and other local funds with a clear, consistent, and updatable procedure including investing in stable communities where other services are provided.

Goals for investing in rehabilitated and newly constructed housing in 2020-2021 include:

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

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

One Year Goals for the Number of Households to be Supported	
Homeless	3,750
Non-Homeless	950
Special-Needs	250
Total	4,950

Table - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	4,000
The Production of New Units	100
Rehab of Existing Units	800
Acquisition of Existing Units	50
Total	4,950

Table - One Year Goals for Affordable Housing by Support Type

-

Discussion

1. HOME: In the 2020-2021 fiscal year, HOME Notice of Funding Availability (NOFA), funds will be targeted to strategic areas in the City. In addition to targeting, discussed in the Geographic Distribution section above, HOME funds will also be prioritized for projects in areas with lower vacancy, market strength or areas located near local employment districts or transit. New construction will be limited to areas where there is clear demand and long-term housing viability. Under the HOME Investor Rental Program HRD expects to rehabilitate 400 units and build another 100 rental units for low/moderate income individuals.

2. CDBG Rehabilitation: HRD's 2020-2021 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 2020-2021, 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, are targeted to low- and moderate-income Senior Detroit homeowners. The grant is used to provide emergency replacement and repair of roofs, furnaces, porches, plumbing, and electrical concerns affecting the immediate health and safety of occupants. An estimated 150 homeowners will be assisted with an approximate expenditure of \$15,000 per home.
- Zero Percent 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 200 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, 2022 (42 Months). 200 units are expected to be served over the three-and-a-half-year period. HRD was awarded \$9.7MM in October 2019. Program period of performance began January 2020 through December 31, 2024 (60 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 OLCHH funding as well as provide emergency repairs as needed to ensure the long-term integrity of the lead repairs.

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 created a comprehensive Capital Improvement Plan that addresses the needs of our properties based on the guidance received from Physical Needs Assessments, input from DHC staff and input from DHC residents. The Plan is created and executed in accordance with HUD guidance and regulations. DHC has effectively expended and administered CFP funds received to improve and preserve DHC properties. DHC will continue to develop and implement the Capital Improvement Plan to improve the quality of life for DHC's residents
- The Detroit Housing Commission has successfully been awarded an Emergency Safety and Security Grants in the past and will continue to see new opportunities to increase revenues or decrease expenses to improve our operations and our ability to serve the community in need of affordable housing
- DHC will create and follow a new Five-Year Action Plan with an emphasis on ADA compliance, energy efficiency upgrades, vacancy reduction and the overall improvement of the physical condition of DHC's ACC inventory
- DHC will explore opportunities to collaborate with governmental agencies, non-profit community organizations, and developer partners to further the development & preservation of affordable housing in the City of Detroit
- DHC will continue to pursue the disposal and/or demolition of blighted properties in its inventory
- DHC will identify sources of financing to leverage its ability to increase affordable housing with the goal of increasing the total Annual Contributions Contract (ACC) Inventory to reach the PHA limits set in The Faircloth Amendment
- DHC 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 leverage our 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 such as at Gardenview Estates or Parkside or seeking tax-credits to aid in our redevelopment efforts
- DHC will consider converting some or all public housing properties to voucher assisted housing through the RAD program as approved and as determined to be beneficial to DHC and their residents
- DHC will seek out self-development as well as new development opportunities to assist with affordable housing initiatives
- DHC, with HUD national staff, has opened and will be expanding the Envision Center to promote family self-sufficiency.

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

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

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

DHC presented its annual plan to the RAB board on February 6, 2020 and made the Plan available for comment on February 14, 2020. 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 Public Housing and a high performer in Housing Choice Vouchers. DHC will continue to move toward the goal of achieving High-Performer status.

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, and other activities to prevent homelessness, provide shelter, and supportive services. Homelessness funding is also used to support the Coordinated Access Model (CAM) and the Homeless Management Information System (HMIS). The CAM system is Detroit's implementation of coordinated entry system, used to assess those experiencing homelessness and match them to resources. HMIS is the database which allows the CoC lead agency, the Homeless Action Network of Detroit, to track program and system performance.

Several initiatives were created or strengthened over the course of the last year to help solve the most urgent needs of those experiencing homelessness and still help as many individuals and families as possible including: the full transition of the CAM system from a call center to site based "access point" model in 2018, which included the system-wide expansion of a homelessness diversion program to help avoid shelter entry and the completion of and implementation of policies and procedures for Rapid Rehousing, with all other components in-process, the use of the chronic by-name list for those experiencing chronic homelessness. In addition, starting in 2021 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 2020, 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:

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

During the 2020-2021 year, Detroit will continue to implement the coordinated assessment process that has been in place since early 2014. This coordinated assessment process reaches out to and assesses persons experiencing homelessness and is required per the HEARTH Act. Locally, this system is referred to as the Coordinated Assessment Model (CAM). The intent of CAM is to provide a streamlined process

by which people who are homeless or at-risk of homelessness are assessed for the most appropriate intervention to meet their needs, and to be able to access those resources.

Through the CAM, households experiencing homelessness, who are either residing in shelters or are unsheltered, receive an assessment using our community's common assessment tool--the Service Prioritization Decision Assistance Tool (SPDAT). The SPDAT assigns a numeric value to help determine what type of intervention a household is best suited for: either that the person will be able to end his/her homelessness on their own; shorter-term assistance such as Rapid Re-Housing (RRH); or longer-term, more intensive assistance such as permanent supportive housing. These assessments are completed at CAM access points or through the phone line during COVID-19. Once the assessment has been made, the household will be referred to a service provider to provide the assistance.

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

In 2021 the City of Detroit plans to fund an Outreach Coordinator entity to work with both federally and private funded outreach providers. 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 the 2018-2019 program year, 238 households were housed in supportive housing. 87% of those housed were chronically homeless, and many of that group were unsheltered who had been supported in obtaining housing by outreach teams, including those funded by the City of Detroit. Our community is hopeful that continuing to target those most in need will result in an overall reduction in chronic homelessness

Addressing the emergency shelter and transitional housing needs of homeless persons

Addressing emergency shelter needs

In 2020-2021, 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.
- Operating a COVID-19 Isolation shelter 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 the Detroit Health Department. Ensuring access to emergency

shelter: There are approximately 21 different emergency shelter providers. Some of these shelters are specifically targeted to youth, veterans, or victims of domestic violence. These projects are expected to continue operations in 2020-2021

- 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 four Warming Centers operating during the winter of 2020-2021
- 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 2019, a total of **2,201 households were diverted including:**
 - a. 14% of total Single Adults presenting at Access Points
 - b. 20% of Unaccompanied Youth presenting at Access Points
 - c. 75% of adult families presenting at Access Points
 - d. 72% of Parenting Youth presenting at Access Points
- In 2020-2021, the City will continue placing greater emphasis on housing outcomes for shelter providers through a revised RFP process which integrates performance metrics into scoring.

Addressing transitional housing needs

The Continuum of Care has reduced its inventory of transitional housing through strategic reallocations. In 2020-2021, 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

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 27% in 2019. We continue to monitor our progress through regular leadership team meetings and by name list meetings. There are currently 182 Veterans experiencing homelessness in Detroit. In our working on Veteran homelessness we deploy the following tools to address Veteran needs:

- Supportive Services for Veteran Families (SSVF): SSVF 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 over 200 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 and transitional housing beds in Detroit will be specifically targeted to families with children
- Families with children will be eligible for ESG-funded RRH and prevention programs
- Linking families to Housing Choice Vouchers provided by the DHC or the Michigan State Housing Development Authority

Unaccompanied Youth - In the 2018-2019 year, the Youth Taskforce was established by City Council President Pro-Tem 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 three transitional housing programs specifically targeted to youth; three are able to serve pregnant/parenting teens.
- There will be an organization that specifically provides outreach, counseling, and supportive

services to homeless youth who identify as Lesbian, Gay, Bisexual, Transgender, or Questioning (LGBTQ).

- 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 2020-2021 year will be to provide short-term leasing assistance and utility and/or rental arrears payments. Detroit will do this by using Emergency Solutions Grant (ESG) funds via RRH or Prevention.

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

- Foster care
- Mental health care
- Correctional facilities

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

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

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

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

employment. 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 2020-2021 year, CDBG funds totaling approximately \$2.4M will support the following homeless activities:

- Street Outreach
- Emergency Shelter Services (Shelter and Essential Services) including the COVID Isolation Shelter
- 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

CDBG homeless funds are also used to meet the 2020-2021 ESG match. ESG regulations require a 100 percent match for every dollar received from HUD. During 2020-2021, CDBG funds will match approximately 85 percent of the 2020 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	220
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	30
Total	250

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

Introduction:

The City of Detroit is committed to increasing affordable housing opportunities for low- and moderate-income households. The City 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 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 ordinance, 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.

Access to Capital—The City has partnered 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 will launch in fall 2020 with more than \$40 million in available 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.

The Office of Immigrant Affairs and Economic Inclusion (OIAEI) is committed to ensuring that every Detroit resident has access to safe and affordable housing and a pathway to settlement in the city. As part of HRD, the OIAEI is responsible for facilitating and ensuring that housing investments and appropriate financial and administrative infrastructural support is awarded to all residents in the City of Detroit, including refugees and immigrants. OIAEI produces and implements project and policy strategies for the inclusion and accessibility to the city of migrant and refugee residents. One significant part of this strategy is ensuring that refugees, who often lack access to capital to ensure long-term housing, are provided access and a comprehensive training leading towards pathways to homeownership. This strategy fulfills the HRD housing policy and goals in contributing to the long-term population growth and physical development of Detroit, while simultaneously including communities that have often been left out of the municipal processes due to the structural disadvantages in terms of language barriers and knowledge access.

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.

The City of Detroit also hosts an annual Affordable Housing Conference (most recently in January 2020) to engage and communicate with the affordable housing stakeholders including developers, lenders, public agencies, and community organizations. This conference serves as a forum for the Housing and Revitalization Department and other city departments to communication process and policy changes and to receive feedback from key affordable housing stakeholders.

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

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

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

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

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

held by UCHC for use in future purchases.

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

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

Actions planned to foster and maintain affordable housing

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

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

- Preservation Action Plan – The City established the Detroit Preservation Partnership to implement a Preservation Action Plan that was developed with nearly 40 community stakeholders in 2017. The Partnership is developing a complete database on all known affordable housing in Detroit, developing a prioritization strategy to prevent loss of affordability where developments are threatened by obsolescence or rising real estate market trends, and working with owners and governmental agencies to develop preservation plans.
- Strengthen the Detroit Housing Commission – The Detroit Housing Commission (DHC) plays a central role in the City’s affordable housing system, overseeing more than 3,500 units of public housing and more than 6,000 housing choice vouchers.
- Leverage publicly owned land for affordable housing development – Non-recreational publicly owned land totals 13,700 acres, much of which is vacant or underutilized, and some of which includes vacant multifamily buildings that can be rehabilitated. The City has already taken several meaningful steps to leverage its land ownership to promote the development of affordable housing. The City will continue to require affordability as part of RFPs for residential development on public land and will require expanded affordability on sites that are competitive for Low Income Housing Tax Credit allocations.
- Affordable Housing Leverage Fund - The City is partnering with a Community Development Financial Institution (Local Initiative Support Corporation) to develop new affordable housing finance tools that are designed to facilitate increased affordable housing preservation and

development activity. The Affordable Housing Leverage Fund is comprised of debt, preferred equity, and predevelopment grant tools to address specific financing challenges in the Detroit. The fund is scheduled to launch in September 2020 with an initial capitalization of \$48 million derived from private and philanthropic sources.

Single Family Housing: The City of Detroit is currently developing a comprehensive strategy to address the quality and affordability of the single-family housing stock in the city. A strategy consultant is currently being procured, with an anticipated strategy release in spring 2021. The strategy is expected to include actions grouped into the following sub-strategies:

- Improve single family home repair programs – The City of Detroit administers and/or supports a range of resources for low- and moderate-income homeowners to address urgent housing quality issues and complete high-impact repairs. The City is actively working to increase the efficiency, accessibility, and cost effectiveness of these activities to increase the number of homeowners served.
- Build/Support capacity to make new affordable for-sale housing available through rehab and infill construction – The limited availability of move-in ready affordable housing has been a significant barrier to neighborhood stability and access to homeownership.
- Preserve housing stability for existing residents – The City will invest in programs and resources that assist residents remain in affordable housing situations by addressing these destabilizing forces.
- Create new tools to support small landlords – As the City has shifted to a majority renter- city with an abundance of older, single family homes rented to low income families, new tools are needed to enable owners to access capital and other supports aimed at improving the quality of housing and eliminating health and safety threats.

Actions planned to reduce lead-based paint hazards

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

Through HUD's Office of Lead Hazard Control and Healthy Homes (OLHCHH), funds are competitively awarded to help units of local government in making homes lead safe. These funds are used in conjunction with our Conventional Home Repair program activities to identify and remediate lead-based paint hazard in privately owned rental or owner-occupied housing. In addition, the grant will also identify and address, where feasible, other health and safety issues using a Healthy Homes Rating System. This system "rates hazards for their potential to harm residents and enables those risks to be removed or

minimized."

In 2019, HRD was awarded its 5th Lead Hazard Reduction Demonstration Grant from OLHCHH covering a 42-month period that began April 1, 2019 and ends September 30, 2022 with the closeout period until December 31, 2022. The target accomplishment is to reduce lead hazards in approximately 200 housing units in which children under the age of 6 resides. In 2018, 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 30 units. In October 2019, HRD was also award \$9.7M from HUD's OLHCHH 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).

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

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

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

Actions planned to reduce the number of poverty-level families

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

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

poverty level families by making decent, safe, and affordable housing available for those in need. For households experiencing homelessness, 582 referrals were made in 2019 to either Rapid Re-Housing (344) or Permanent Supportive Housing (238) according to the Homeless Action Network of Detroit's 2019 Annual State of Homelessness 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, an article published in the Detroit Free Press on May 13th noted that teacher vacancies in the district have reduced by more than half, and salaries have increased by more than \$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 2020-2021, CDBG Neighborhood Opportunity Fund will support approximately \$1.4 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; Building a more vibrant and beautiful City of Detroit by bringing our neighborhood Main Streets back to life with more activity, public art and green infrastructure; Improving the communications and outreach; 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 include: A number of programs designed specifically to address particular populations such as veterans and those recently released from prison; A Detroit Registered Apprentice Program (D-RAP) assisting Detroiters eager to acquire the

technical skills needed to build a career; A Driver Responsibility Forgiveness fee that helps Detroiters get drivers licenses they lost back more quickly by participating in workforce training.

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

In addition, the homeless system is increasing the level of collaboration through a pilot project that connects households experiencing homelessness with a referral to Detroit at Work at the time of enter emergency shelter. This immediate referral allows families to quickly connect with workforce service as employment is often a critical component to ending a household's homelessness.

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

Actions planned to develop institutional structure

The City of Detroit has developed its institutional structure by establishing partnerships with City departments 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 below:

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

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

The City of Detroit will also continue to support the DHC in its forward progress of their EnVision Center. HUD Secretary Dr. Ben Carson 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.

A recent fair housing study conducted by Wayne State University revealed a need for more accessible housing in Detroit. This claim is supported by the fact that failure to accommodate a person with a disability is one of the leading causes for fair housing complaints in Detroit over the past 5-years. The focus group participants stated disability is a frequent basis for fair housing violation because it is often obvious. In cases where a person's disability is noticeable, a potential landlord is often unwilling to accommodate them. Disability is a huge barrier to housing. Funding non-profit groups such as United Community Housing Coalition (\$196,594) and Neighborhood Legal Services (\$122,121) 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. Also, the CDBG will continue to fund several other non-profit groups for the purposes of furthering fair housing. (see attachment in the appendices, City of Detroit Resources for Further Fair Housing).

Program Specific Requirements

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

Introduction:

HRD will continue 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.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
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.	0.83%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(l)(2)

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

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

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

The City does not currently undertake homebuyer activities using the HOME Investment Loan Program, however, there exist several HOME-assisted properties in the City's portfolio in which expiration of LIHTC will enable current tenants of single-family rental units to purchase their homes. In such cases, the City is currently in the process of developing the Resale requirement provisions in accordance with CPD Notice 12-003 (*Guidance on Resale and Recapture Provision Requirements under the HOME Program*). Upon approval from HUD this provision will be advertised in the local newspaper and on the City's website for a 30-day comment period. After the expiration of the comment period and the review of the comments the provision will be implemented as stated.

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

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

Prorate the amount recaptured based on the time the homeowner has owned and occupied the units measured against the required affordability period. A portion of CDBG homebuyer assistance provided may be required to be repaid if the property is sold or ownership is transferred prior to the end of the 5-year lien, based on the percentage of the affordability period that has expired.

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

The City of Detroit may use HOME funds to refinance existing debt secure by multifamily housing if

the following conditions are met:

1. The refinance enables the property to recapitalize through a rehabilitation that totals not less than \$10,000 per unit.
4. 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.
5. The owner must enter into an affordability agreement, recorded as a covenant running with the land, that either preserves affordability, or creates new affordable units for a period of 15 years.
6. The property must be in the City of Detroit.

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

Emergency Solutions Grant (ESG)

Reference 91.220(I)(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. Starting 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.

- 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 2019-2020 RFP for the Homelessness Solutions programs, the City defined performance measures, established baselines, and benchmarks for organizations to meet during the coming year. This work has continued in the 2020-2021 RFP.

Housing Opportunities for Persons with Aids (HOPWA)

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

- A. Selection of Project Sponsors**

The City of Detroit Health Department is the grantee for the HOPWA Program, with Southeastern Michigan Health Association (SEMHA), providing all Human Resource and fiduciary responsibility. The Health Department and SEMHA follows the City's procurement policy from the Office of Contracts and Procurement Department. The summary of the procurement process of selecting program sponsors for the HOPWA program are as follows:

“Request for Proposal” (RFP) application is issued for potential program sponsors based on the contract cycle. The RFP is open and available to the community, including grassroots, faith-based and all other community organizations for proposal bids. All RFP’s are advertised on community websites, local and minority newspapers such as the Detroit News/Free Press and discussed at coalition and committee meetings. The evaluation and scoring for the proposals are based on an independent review panel made up of representatives of the community.

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

B. Goals for HOPWA funded projects

HOPWA’s goals are based on community need and prior year activities.

GOAL: “To connect HIV positive Detroit and Wayne County residence with Tenant Based Rental Assistance (TBRA), Community Residential/Transitional Housing, and Coordinated Supportive Services.”

1. Tenant Based Rental Assistance (TBRA)

HOPWA’s one-year goal under TBRA is to assist 220 eligible individuals and their beneficiaries with Housing assistance which include, subsidized rental payments and Case Management services and linkages to supportive services.

2. Community Residential/Transitional Housing

For 2019-2020, a decision was made to phase out the Community Residential/Transitional Housing program to focus more attention on the Tenant Based program, and to begin working on the potential for Short Term Rental, Mortgage and Utility payments (STRMU). For fiscal year 2020-2021 HOPWA will no longer fund this program.

3. 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.

APPENDICES:

City of Detroit
FY 2020-2024 Consolidated Plan
PR-10 Community Consultation Continued

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

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.

Additional Agencies

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 back stage 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.

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
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 1 – 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(I)).

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 third 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.

**City of Detroit FY 2020-2024 Con Plan
Additions to PR-10 Consultation**

Table 1 – Agencies, groups, organizations who participated

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?	<p>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</p>
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

	<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<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	<p>Agency/Group/Organization</p>	<p>Detroit Department of Digital Inclusion</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"/> 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>
	<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>

	Agency/Group/Organization Type	Other government - Local Grantee Department
	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. The Department developed the Detroit Sustainability Action Agenda which 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"/>
	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 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>

City of Detroit
FY 2020-2024 Consolidated Plan
SP-35 Anticipated Resources Continued

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c) (1,2)

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 - Continued

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) partnered 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 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.

Choice Neighborhoods - The City plans to apply for a HUD's Choice Neighborhoods Initiative (CNI) Implementation Grant due in December 2020. The Choice Neighborhoods program leverages significant public and private dollars to support locally driven strategies that address struggling neighborhoods with severely distressed public and/or HUD assisted housing through a comprehensive approach to neighborhood transformation. The proposed application involves the implementation of a comprehensive Transformation Plan in Greater Corktown 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. Given this context, the City engaged in an in-depth neighborhood planning process, to ensure that the Transformation Plan reflects the needs and priorities of existing residents. The vision for the neighborhood involves creating high-quality affordable and mixed income housing options, including opportunities for homeownership across the income spectrum, as well as targeted investments in neighborhood and people to support long-term stabilization. The full CNI housing plan aims to create approximately 900 new units, with more than 50% affordable to low-income residents with a mix of affordability levels. This includes the redevelopment of the 86 existing assisted units at Clement Kern Gardens as well as 40 new homeownership units. The development team will seek Housing Choice Vouchers through the Detroit Housing Commission to support this housing plan. HRD is coordinating the

CNI application process and plans to support neighborhood and housing initiatives within the plan through CDBG and HOME investment.

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 2019, 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 2020 HOME funds as well and it is anticipated that 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 which may be used to assist in meeting the needs identified in this plan.

City of Detroit

FY 2020-2024 Consolidated Plan

SP-40 – Institutional Delivery Structure Continued

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Planning & Development Department (P&DD)	Dept and Agencies	Historic designation advisory, historic review clearances, planning studies, site plan review, city master plan, zoning district boundaries approvals, and development plans.	Jurisdiction
Detroit Building Authority (DBA)	Dept and Agencies	Demolition of residential and commercial building and elimination of blight within the 7 districts in Detroit.	Jurisdiction
Detroit Land Bank Authority (DLBA)	Dept and Agencies	Demolition of residential and commercial building and elimination of blight within the 7 districts in Detroit.	Jurisdiction
Department of Neighborhoods (DON)	Dept and Agencies	Help 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.	Jurisdiction
Detroit Health Department	Dept and Agencies	Provide programs/services. Lead Prevention Program, Lead Safe Detroit, Lead Abatement Grant, Lead Education, Healthy Homes Detroit Program, The Housing Opportunities for Persons with AIDS (HOPWA) grant programs; and Tenant Based Rental Assistance (TBRA), Community Residential/Transitional, and Housing Supportive Services.	Jurisdiction
Building Safety Engineering and Environmental Department (BSEED)	Dept and Agencies	Lead hazard inspection for a rental property; rental housing compliance	Jurisdiction
Detroit Department of Transportation (DDOT)	Dept and Agencies	Public transportation operator of city bus service in Detroit	Jurisdiction

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Detroit Housing Commission (DHC).	Public Housing Authority (PHA)	Public Housing: The DHC manages the following program: Section 8 - Low-income public housing.	Jurisdiction
Wayne Metropolitan Community Action Agency (WMCAA)	Dept and Agency	Homeless Programs and services: WMCAA provide 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	Jurisdiction
Detroit Economic Growth Corp	Redevelopment Authority	The DEGC serves as the economic driver for development initiatives for the City. In addition to this, the DEGC's role through the Motor City Match program is to create jobs by giving technical assistance to entrepreneurs and assist with business expansion within the City.	Jurisdiction
Detroit Employment Solutions Corporation (DESC)	Dept and Agencies	DESC is one of the State's Michigan Works! Association and is the lead for the City's Detroit at Work, which provides job placement, training, and career advisement.	Jurisdiction
Local Initiatives Support Corporation (LISC)	Private Industry	Zero Percent Home Repair Loan (homeowners program). We invest in affordable housing, growing businesses, safer streets, high-quality education, and programs that connect people with financial opportunity.	Jurisdiction
Homeless Action Network of Detroit (HAND)	Continuum of Care	Homelessness, Non-homeless special needs, Public Housing, Rental, public services	Jurisdiction
DAAA - Detroit Area of Aging Agency	Non-profit organizations	public services	Jurisdiction
Detroit Housing Coalition (DHC)	Non-profit organizations	public services, homelessness	Jurisdiction

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Fair Housing Center of Metropolitan Detroit	Non-profit organizations	public services	Jurisdiction

Table 1 - Institutional Delivery Structure

- **Housing Underwriting Division's** mission is to invest the City's federal and other housing resources to create new affordable single-family and multifamily projects and homelessness prevention strategy.
- **Community Development Underwriting Division's** mission is to provide impact driven Community Development Block Grant (CDBG) funding to low – to – moderate income persons in order to help stabilize neighborhoods and sustain a healthy and safe environment for City of Detroit residents.
- **Public-Private Partnerships Division's** mission is to leverage both public and private funds to strategically transform neighborhoods that have mixed-income and mixed-use developments.
- **Policy and Implementation Division's** mission is to create development and policy initiatives. The initiatives are geared toward preserving and creating more affordable housing opportunities, as well stabilizing Detroit's housing market, and opportunities for Detroit immigrants.
- **Real Estate/Special Projects Division** mission is to coordinate and manage surplus real estate sales, as well as provide the Director and other divisions with real estate, contract, and legal support.
- **Administration and Finance Division** mission is to lead process in the department and ensure compliance with federal, state, county, local, and grantor regulations.

City of Detroit
FY 2020-2024 Consolidated Plan
SP-80 – Monitoring Continued

SP-80 Monitoring – 91.230

Describe the standards and procedures that the grantee will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements.

Each year, HRD make site visits to monitor its partners and subgrantees to ensure uniformity and efficiency in the administration of the CDBG/HOME/ESG/HOPWA programs. On-site monitoring examines the subgrantees financial systems and controls, procurement, cost reasonableness of activities, program income, national objectives/income eligibility of participants, record retention, overall management systems, Section 3, MBE/WBE, project progress, as well as other cross-cutting federal regulations.

Results of monitoring reviews will be communicated in writing to the sub-recipient/agency and will include any non-compliance issues and corrective recommendations for achieving compliance, if warranted. If a problem persists, sanctions may be imposed appropriate to the scale of the problem. When deemed necessary, sub-recipients may be required to attend applicable HUD and/or HRD provided training as part of the corrective action process.

COMMUNITY DEVELOPMENT BLOCK GRANT

Scheduled Program Monitoring: Once a subrecipient has been identified for an on-site program monitoring, a monitoring date is established with the subrecipient. A formal written letter is forwarded to the organization at least two (2) weeks prior to the scheduled visit (where possible), confirming the meeting date, purpose, as well as advising of specific documents, processes and areas subject to review. During this visit, staff will verify that the programs outlined in the contract scope are being carried out as described in the agreement, as well as review documentation, conduct interviews with staff, and complete site inspections. The HRD staff conducting the program monitoring shall inform the Subrecipient of any program findings and/or concerns within thirty (30) days after the conclusion of the monitoring visit.

EMERGENCY SOLUTIONS GRANT

The Housing & Revitalization Department (HRD) is the City of Detroit department responsible for ensuring compliance with all regulatory and statutory requirements relative to ESG and CDBG Homeless Public Service funding. Therefore, it is incumbent upon the HRD staff to ensure Emergency Solutions Grant funds or those specifically delineated as match are spent on time and in compliance with all regulatory, statutory, and mandates outlined in the subrecipient agreements. Housing and Revitalization staff also ensure adherence to the Continuum of Care's written standards and City of Detroit Policies and Procedures.

HOME INVESTMENT PARTNERSHIP

The Program Administrator (PA) for the HOME Investor Compliance Monitoring implements required guidelines and procedures to monitor, review and perform scheduled on-site inspections of HOME-assisted rental housing to determine compliance with household housing costs, household income guidelines, and Section 8 Housing Quality Standards (HQS), and procedures to comply with post-rehabilitation lead-based paint activities for rental properties rehabilitated using HOME funds. The PA schedules a compliance monitoring, necessary to complete compliance monitoring requirements on all HOME-assisted units. The PA submits a HOME Compliance Monitoring schedule to HRD management for

review and approval. Staff will conduct a site inspection of rental units for HQS compliance and compliance with HUD's Lead-Based Paint Regulations for projects rehabilitated using HOME funds. HRD staff reviews the HQS report and notify owners of compliance or non-compliance. Review all leases of HOME-assisted units to ensure leases are following the Affordable Housing Restriction document executed at loan closing.

HOPWA

The Detroit Health Department monitors the HOPWA contract and Southeastern Michigan Health Association (SEMHA) staff administer the HOPWA program and assures program quality management with fiscal and program monitoring. Staff complete and monitor all leases of HOPWA assisted units to ensure compliance and conforms to the Housing Quality Standards (HQS) procedures for properties funded through HOPWA. Recertification occurs once per year on client's anniversary date, with staff monitoring households 3 times per year based on individualized housing plans.

CDBG Home Repair Loan Program

Local Initiative Support Corporation (LISC), expedites and coordinates the efforts of non-profits, private groups, and government in providing affordable housing through their administration of the Detroit Affordable Housing Leverage Fund (AHLF). As a CDBG subrecipient LISC is subject to the monitoring requirements outlined in 2 CFR 200.330-200.331 and therefore responsible for monitoring the agencies that are under subrecipient agreement with LISC. LISC has developed monitoring policies and procedures for monitoring non-profit intake centers and local community development financial institutions (CDFIs) that process and service the home repair loans. HRD staff will use these mechanisms and develop other coordinating mechanisms including periodic contact with various agencies involved in the process to ensure that the Monitoring Plan is implemented in a timely and efficient manner.

Minority Outreach Program – HRD's bid procedures model those procedures used by the City's Office of Contracting and Procurement for general City bids and promotes opportunities for Minority Business Enterprise (MBE)/Women Business Enterprise (WBE). HRD conducts forums and informational meetings to recruit and retain qualified contractors.

Comprehensive Planning Requirements – Extensive study, research and planning serve as the City's background related to strategic efforts to improve low-income and blighted areas of the City. As a part of the City's 2015-2019 Consolidated Plan submission, five Neighborhood Revitalization Strategy Areas (NRSAs) and three Slum/Blighted target areas were identified and approved by HUD. These designations were based on data from the Hardest Hit Program and an extensive community consultation process with the objective of transforming these areas to thriving, productive, high-quality-of-life neighborhoods. Resources directly from funding contained in this Plan are combined with other federal, state, and local funds to achieve these goals. Activities undertaken within these areas are monitored through in-house and project reviews to ensure long-term compliance with environmental standards, lead-based paint, acquisition/disposition and relocation, Section 504 and other Fair Housing standards including Affirmative Marketing, Affirmatively Furthering Fair Housing. Efforts to educate all parties as to the significance of these federal rules and the ramifications of non-compliance continue to take place in these areas.

Fair Housing Issues

The City conducted a HUD required Assessment of Fair Housing in 2018 and established a set of fair housing goals and priorities to be implemented through 2024. The goals were outreach to increase awareness of fair housing laws; enforcement of housing and building codes; improve access to opportunity; and improve quantity and quality of affordable and accessible housing. The fair housing action plan will be monitored by HRD staff with support from the DHC, local and regional fair housing agencies, the City's Building Safety Engineering and Environmental Department, and Civil Rights, Inclusion & Opportunity Department (CRIO). The actions taken and the impact of the strategies will be documented and reported on the City's annual CAPER. HRD staff will include standards and procedures to address fair housing issues and goals in its monitoring policies and procedures.

NRSA Monitoring

The City plans to submit a renewal application for its Neighborhood Revitalization Strategy Area (NRSA) designation. The City must identify and document the results expected to be achieved by the NRSA strategy as well as leverage from non-federal sources received and used to support the NRSA. In compliance with NRSA requirements in HUD Notice CPD-16-16 issued September 2016, HRD staff will take the following steps:

First, measurable, and specific NRSA goals and objectives will be established to reach desired outcomes and track progress. Second, each Annual Action Plan shall identify the activities the City will fund to carry out the NRSA strategy and the targeted achievements expected for the program year. Third, HRD staff will enter at least semi-annually, activity data correctly into IDIS which will be reported in the PR84 report: the "CDBG Strategy Area, CDFI, and Local Target Area Report." Fourth, report actual outputs and outcomes and a narrative update on the NRSA progress in the CAPER including:

- continuing stakeholder involvement
- activities addressing identified housing and economic opportunities
- progress on achieving identified outcomes through reported accomplishments
- documentation that leveraged resources received and used for their intended purposes

HRD will provide training and reporting tools for the non-profit agencies and City department personnel involved in implementing the NRSA strategies.

2020-21 ACTION PLAN BUDGET

2020-2021 HUD Annual Action Plan Projects and Activities

Program Name	Activity	National Objective	Matrix Code	Sponsor Name (Activity Name)	Recommended Amount	Project Description	Site Address	Start Date	Completion Date	Objective	Outcome	Specific Objectives	Accomplishment Type	Proposed Accomplishment	Outcome Indicators	Priority Need	City wide	NRSA	Slam Blight	City Districts
CDBG	AD/PLN	N/A	21A	Administration	2,380,030.00	Administration - Direct staff costs related to HUD community development and program management.	2 Woodward CAYMC, Detroit, MI 48226	7/1/2020	6/30/2021	N/A	N/A	N/A	Other	N/A	N/A	Planning/Administration	N/A	N/A	N/A	N/A
CDBG	AD/PLN	N/A	20	Eight Mile Blvd	25,000.00	Planning activities with other local governments bordering the City of Detroit along Eight Mile Boulevard.	2 Woodward CAYMC, Detroit, MI 48226	7/1/2020	6/30/2021	N/A	N/A	N/A	Other	N/A	N/A	Planning/Administration	N/A	N/A	N/A	N/A
CDBG	AD/PLN	N/A	20	Planning General	1,649,413.00	Planning - Direct staff costs related to community development and urban planning including conducting planning studies for low and moderate income neighborhoods for the City of Detroit.	2 Woodward CAYMC, Detroit, MI 48226	7/1/2020	6/30/2021	N/A	N/A	N/A	Other	N/A	N/A	Planning/Administration	N/A	N/A	N/A	N/A
CDBG	AD/PLN	N/A	20	Planning Historic Designation Advisory Board (HDAB)	42,000.00	Planning costs related to planning activities for historic properties	2 Woodward CAYMC, Detroit, MI 48226	7/1/2020	6/30/2021	NA	N/A	N/A	Other	N/A	N/A	Planning/Administration	N/A	N/A	N/A	N/A
CDBG	AD/PLN	N/A	21A	Office of Hsg Underwriting-Supportive Hsg	551,695.00	Direct staffing Costs related to CDBG/NOF and Homeless initiatives	2 Woodward CAYMC, Detroit, MI 48226	7/1/2020	6/30/2021	NA	N/A	N/A	Other	N/A	N/A	Planning/Administration	N/A	N/A	N/A	N/A
CDBG	AD/PLN	N/A	21A	Office of Programmatic NOF & CDBG Initiatives	1,821,992.00	Direct staffing Costs related to NOF & CDBG Initiatives	2 Woodward CAYMC, Detroit, MI 48226	7/1/2020	6/30/2021	NA	N/A	N/A	Other	N/A	N/A	Planning/Administration	N/A	N/A	N/A	N/A
CDBG	AD/PLN	N/A	21A	Fair Housing Awareness	25,000.00	Fair Housing Awareness activities for the Fair Housing Center of Metropolitan Detroit	5555 Conner St, Detroit, MI 48213	7/1/2020	6/30/2021	NA	N/A	N/A	Other	N/A	N/A	Planning/Administration	N/A	N/A	N/A	N/A
CDBG	AD/PLN	N/A	21A	Policy Implementation Staffing	410,000.00	Direct staffing costs for Policy and Implementation Division	2 Woodward CAYMC, Detroit, MI 48226	7/1/2020	6/30/2021	NA	N/A	N/A	Other	N/A	N/A	Planning/Administration	N/A	N/A	N/A	N/A
					6,905,130.00	Subtotal AD/PLN														
CDBG	DEMO	SBS	04	Demolition/Boarding & Nuisance Abatement	1,026,044.00	Demolition of vacant, dangerous, and abandoned structures including commercial bldgs city-wide w/an additional nuisance abatement program	2 Woodward CAYMC, Detroit, MI 48226	7/1/2020	6/30/2021	Suitable Living Environment	Sustainability	Improve neighborhood quality by demolishing unsafe structures	Housing/Commercial Units	50	Targeted revitalization	Other	X	All	All	All
					1,026,044.00	Subtotal DEMO														
CDBG	ED	LMA	18B	Economic Development Small Business Devlpt (Motor City Match) (Businesses in NRSA)	1,500,000.00	Economic Dvlpt endeavors aimed at sustaining or increasing business activity levels (including job creation and /or retention).	2 Woodward CAYMC, Detroit, MI 48226	7/1/2020	6/30/2021	Creating Economic Opportunities	Sustainability	Improve economic opportunities for low-income persons	Businesses	120	Businesses assisted	Business Development	X	All	N/A	All
CDBG	ED	LMA	18B	Economic Development Small Business Devlpt (Motor City Match) (Businesses in NRSA 2)	TBD	Economic Dvlpt endeavors aimed at sustaining or increasing business activity levels (including job creation and /or retention).	2 Woodward CAYMC, Detroit, MI 48226	7/1/2020	6/30/2021	Creating Economic Opportunities	Sustainability	Improve economic opportunities for low-income persons	Businesses	120	Businesses assisted	Business Development	X	All	N/A	All
CDBG	ED	LMA	18B	Economic Development Small Business Devlpt (Motor City Match) (Businesses in NRSA 3)	TBD	Economic Dvlpt endeavors aimed at sustaining or increasing business activity levels (including job creation and /or retention).	2 Woodward CAYMC, Detroit, MI 48226	7/1/2020	6/30/2021	Creating Economic Opportunities	Sustainability	Improve economic opportunities for low-income persons	Businesses	120	Businesses assisted	Business Development	X	All	N/A	All
CDBG	ED	LMA	18B	Economic Development Small Business Devlpt (Motor City Match) (Businesses in NRSA 4)	TBD	Economic Dvlpt endeavors aimed at sustaining or increasing business activity levels (including job creation and /or retention).	2 Woodward CAYMC, Detroit, MI 48226	7/1/2020	6/30/2021	Creating Economic Opportunities	Sustainability	Improve economic opportunities for low-income persons	Businesses	120	Businesses assisted	Business Development	X	All	N/A	All

2020-2021 HUD Annual Action Plan Projects and Activities

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CDBG	HP	SBA	16A	Historic Preservation Residential (150 Bagley)	1,322,699.00	Rehabilitation of residential historic and the preservation of 150 Bagley Funds will be used to support the preservation of historical architectural elements in properties being redeveloped to provide affordable housing	150 Bagley, Detroit MI 48226	7/1/2020	6/30/2022	Suitable Living Environment	Availability/Accessibility	Improve quality/quantity of neighborhood facilities for low/mod persons	Housing Units	TBD	Homeowner Housing Rehabilitated	Owner Occupied Housing	N/A	N/A	1	6
					1,322,699.00	Subtotal HISTORIC PRESERV														
CDBG	PS	LMA	05D	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	7/1/2020	6/30/2021	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	87,126.00	To provide free tax preparation and counseling assistance to Low/Mod income Detroit households; provides education in financial management.	7700 Second Ave Suite 314 Detroit, MI 48202	7/1/2020	6/30/2021	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	05H	Cass Community Social Service	65,000.00	Sustainability Institute is to train unemployed and underemployed adults to succeed in living wage jobs in the 21st Century Green Economy in metropolitan Detroit	11745 Rosa Parks Blvd. Detroit MI 48206	7/1/2020	6/30/2021	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	5
CDBG	PS	LMC	05H	Center for Employment Opportunities	82,121.00	CEO program aim to reduce recidivism and improve employment outcomes for people returning home from incarceration	7300 Woodward Ave. Detroit, MI 48202	7/1/2020	6/30/2021	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	325	Public service activities other than low/moderate-income housing benefit	Public Services	X	ALL	ALL	ALL
CDBG	PS	LMC	05D	Clark Park Coalition	82,121.00	Provide a range of Youth summer recreation programs , a winter hockey program, and youth employment opportunities.	1130 Clark Street Detroit MI 48208	7/1/2020	6/30/2021	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	N/A	2, 3	2	4, 5, 6
CDBG	PS	LMC	05D	Cody Rouge Community Action Alliance	82,121.00	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	7/1/2020	6/30/2021	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	72,121.00	After school program for youth 6-12. Leadership development, parents workshop, life skills, instill confidence in Detroit students, Real Skills 2.0 after school program.	7650 2nd Ave Suite 206, Detroit, MI 48202	7/1/2020	6/30/2021	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	392	Public service activities other than low/moderate-income housing benefit	Public Services	N/A	N/A	N/A	5
CDBG	PS	LMC	05D	Detroit Area Pre-College Engineering Program (DAPCEP)	82,121.00	Program provides nationally recognized enrichment programs in science technology, engineering, and mathematics.	42 W. Warren Detroit, MI 48202	7/1/2020	6/30/2021	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	200	Public service activities other than low/moderate-income housing benefit	Public Services	X	ALL	ALL	ALL
CDBG	PS	LMC	05A	Delray United Action Council	67,121.00	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	7/1/2020	6/30/2021	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	115	Public service activities other than low/moderate-income housing benefit	Public Services	X	ALL	ALL	ALL

2020-2021 HUD Annual Action Plan Projects and Activities

Program Name	Activity	National Objective	Matrix Code	Sponsor Name (Activity Name)	Recommended Amount	Project Description	Site Address	Start Date	Completion Date	Objective	Outcome	Specific Objectives	Accomplishment Type	Proposed Accomplishment	Outcome Indicators	Priority Need	City wide	NRSA	Slum Blight	City Districts
CDBG	PS	LMC	05Z	Dominican Literacy Ctr	82,121.00	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	7/1/2020	6/30/2021	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	135	Public service activities other than low/moderate-income housing benefit	Public Services	N/A	2	N/A	4
CDBG	PS	LMC	05M	Eastern Market Corporation	57,121.00	Eastern Market will expand its food access and nutrition education programs in the City of Detroit to serve more people and to serve them more deeply.	2934 Russell St. Detroit, MI 48207	7/1/2020	6/30/2021	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	N/A	N/A	5
CDBG	PS	LMC	05H	Focus HOPE	77,121.00	Preparing unemployed and under-employed Detroiters for information technology jobs, creating greater economic self-sufficiency. Contextualized work readiness training aimed at earning industry certifications	1200 Oakman Blvd Detroit, MI 48238	7/1/2020	6/30/2021	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	300	Public service activities other than low/moderate-income housing benefit	Public Services	N/A	N/A	N/A	2.5
CDBG	PS	LMC	05M	Greater Detroit Agency for the Blind and Visually Impaired (GDABVI)	72,121.00	Provides "in-home" rehab therapy, mobility training and group support for the visually impaired.	16625 Grand River Ave. Detroit, MI 48227	7/1/2020	6/30/2021	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	05Z	Heritage Literacy	72,121.00	To promote the academic and career success as well as the well-being of youth, preparing for an increasingly international and competitive world. We create and provide programs that promote skill development and communication.	4444 Second Ave., Detroit, MI 48201	7/1/2020	6/30/2021	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	120	Public service activities other than low/moderate-income housing benefit	Public Services	X	N/A	N/A	6
CDBG	PS	LMC	05H	International Institute of Metropolitan Detroit	82,121.00	Low/Mod to assist immigrants and non-immigrants with immigration issues, legal, GED, Financial Literacy, Career Development.	111 East Kirby Detroit, MI 48202	7/1/2020	6/30/2021	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	1800	Public service activities other than low/moderate-income housing benefit	Public Services	N/A	2,3,5	2	4,5,6,7
CDBG	PS	LMC	05I	Jefferson East Business Association	82,121.00	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	7/1/2020	6/30/2021	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	05M	Joy-Southfield CDC	72,121.00	HEART Detroit program provides free health promoting resources, preventive health education, chronic disease management, community-based wellness promotion and increased access to affordable healthy food.	18917 Joy Road Detroit MI 48228 18900 Joy Rd. 48228 Zip: 48228_	7/1/2020	6/30/2021	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	N/A	5	1	7
CDBG	PS	LMC	05A	L&L Adult Day Care	72,121.00	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	7/1/2020	6/30/2021	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	ALL
CDBG	PS	LMC	05E	Latin Americans for Social and Economic Development (LASED)	77,121.00	Transportation, food assistance, and help in obtaining access to other vital services and wellness.	4138 W. Vernor Hwy. Detroit MI 48209	7/1/2020	6/30/2021	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	250	Public service activities other than low/moderate-income housing benefit	Public Services	N/A	1	N/A	5
CDBG	PS	LMC	05A	Luella Hannan Memorial	82,121.00	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	7/1/2020	6/30/2021	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	300	Public service activities other than low/moderate-income housing benefit	Public Services	X	ALL	ALL	ALL
CDBG	PS	LMC	05A	Matrix Human Services	82,121.00	Providing services to Seniors to increase self-sufficiency in their home. Services include access to direct services, nutritional and emergency food assistance, transportation services, and medical services	13560 E. McNichols Detroit MI 48205	7/1/2020	6/30/2021	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	05D	Mosaic Youth Services	77,121.00	Serving Detroit area youth ages 11 – 18, project is the 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.	2251 Antietam Ave. Detroit, MI 48207	7/1/2020	6/30/2021	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	N/A	N/A	N/A	5
CDBG	PS	LMC	05M	My Community Dental Center (MCDC)	71,409.00	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	7/1/2020	6/30/2021	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	05C	Neighborhood Legal Services (Wayne County)	72,121.00	To provide comprehensive case management services, including legal representation and shelter for up to 36 victims of human trafficking.	7310 Woodward Ave., Suite301 Detroit MI 48202	7/1/2020	6/30/2021	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	36	Public service activities other than low/moderate-income housing benefit	Public Services	X	ALL	ALL	ALL

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CDBG	PS	LMC	05D	People's Community Services	82,121.00	The EPIC Youth program provides after school youth recreational, educational, fine arts activities along with counseling for youth ages 6 to 18.	420 South Leigh Street Detroit MI 48209	7/1/2020	6/30/2021	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	240	Public service activities other than low/moderate-income housing benefit	Public Services	N/A	3	N/A	6
CDBG	PS	LMC	05D	Project Healthy Community	72,121.00	Requesting funds for PHC's Emerging Scholars program to prepare middle and high school student for college and their careers and make them stronger mentors for younger students through leadership and soft-skills development, workplace learning and volunteerism	18100 Meyer Dr. Detroit, MI 48235	7/1/2020	6/30/2021	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	05M	Ruth Ellis	60,000.00	Ruth Ellis Second Stories LGBTQ Drop In Center serves runaway and homeless lesbian, gay, bisexual, transgender, and questioning young people. Support services include: street outreach, emergency services, mental and physical health services on site.	77 Victor Street Detroit MI 48203	7/1/2020	6/30/2021	Suitable Living Environment	Availability/Accessibility	Improved Services for low/mod persons	People	120	Public service activities other than low/moderate-income housing benefit	Public Services	X	ALL	ALL	ALL
CDBG	PS	LMC	05D	SEED (Sowing Empowerment & Economic Dev)	72,121.00	Program provides summer/ after-school enrichment aimed at fostering academic achievement, character development, social action and wellness.	16461 Van Buren, Detroit, MI 48228	7/1/2020	6/30/2021	Suitable Living Environment	Availability/Accessibility	Improve the services for low/mod income persons	People	75	Public service activities other than low/moderate-income housing benefit	Public Services	X	ALL	ALL	6
CDBG	PS	LMC	05Z	Siena Literacy Center	82,121.00	Expansion of services to include Fridays and some Saturdays. Addresses Adult Literacy, reading, writing, mathematics and digital literacy.	16888 Trinity Detroit MI 48219	7/1/2020	6/30/2021	Suitable Living Environment	Availability/Accessibility	Improve the services for low/mod income persons	People	104	Public service activities other than low/moderate-income housing benefit	Public Services	N/A	N/A	N/A	1
CDBG	PS	LMC	05D	SOAR Detroit	72,121.00	The In-School Reading Partnership Expansion Program is an expansion of Soar Detroit's current reading intervention. Soar Detroit partners with local elementary schools to help their student's achieve their reading goals.	21001 Moross Rd Detroit, MI 48236	7/1/2020	6/30/2021	Suitable Living Environment	Availability/Accessibility	Improve the services for low/mod income persons	People	150	Public service activities other than low/moderate-income housing benefit	Public Services	N/A	1	N/A	4
CDBG	PS	LMC	05A	St. Patrick Senior Center	87,121.00	Assist seniors in remaining independent by providing health & wellness programs, daily home cooked meal program, transportation services, health care advocacy and in-home support services.	58 Parsons Street Detroit MI 48201	7/1/2020	6/30/2021	Suitable Living Environment	Availability/Accessibility	Improve the services for low/mod income persons	People	900	Public service activities other than low/moderate-income housing benefit	Public Services	X	N/A	N/A	6
CDBG	PS	LMC	05H	St. Vincent and Sarah Fisher Ctr.	87,121.00	St. Vincent and Sara Fisher Center offers preparation for successful completion of the GED exam and assist residents to become economically self sufficient / Offered to adults 18 years and older/ 400-participants.	16800 Trinity Detroit MI 48219	7/1/2020	6/30/2021	Suitable Living Environment	Availability/Accessibility	Improve the services for low/mod income persons	People	350	Public service activities other than low/moderate-income housing benefit	Public Services	X	N/A	N/A	1
CDBG	PS	LMC	05D	The Youth Connection	77,121.00	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	7/1/2020	6/30/2021	Suitable Living Environment	Availability/Accessibility	Improve the services for low/mod income persons	People	250	Public service activities other than low/moderate-income housing benefit	Public Services	X	N/A	N/A	3
CDBG	PS	LMC	05M	The Yunion	72,121.00	HIV prevention program to address and decrease HIV infection among African-American women and girls.	11 East Kirby Detroit MI 48207	7/1/2020	6/30/2021	Suitable Living Environment	Availability/Accessibility	Improve the services for low/mod income persons	People	450	Public service activities other than low/moderate-income housing benefit	Public Services	X	N/A	N/A	5
CDBG	PS	LMA	05D	Urban Neighborhood Initiative	77,121.00	To support out-of-school education for youth ages 5-13/after school and summer enrichment programs/ sports/ STEM, art, computer.	8300 Longworth Detroit MI 48209	7/1/2020	6/30/2021	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	82,121.00	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	7/1/2020	6/30/2021	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	82,121.00	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	7/1/2020	6/30/2021	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	ALL	ALL	N/A
CDBG	PS	LMC	05D	YMCA	77,121.00	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	7/1/2020	6/30/2021	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	N/A	N/A	N/A	5

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					2,833,528.00	Subtotal Public Service														
CDBG	PSHL	LMC	03T	Alternatives For Girls (ES)	45,937.50	(ES) Provides shelter for young women.	903 West Grand Blvd. Detroit MI 48208	7/1/2020	6/30/2021	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	03T	Alternatives For Girls (RR)	17,259.00	Quickly rehouse families and individuals that are literally homeless.	904 West Grand Blvd. Detroit MI 48208	7/1/2020	6/30/2021	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	03T	Cass Community Social Services (ES)	52,500.00	Provide rotating shelter for adults and family shelter.	11850 Woodrow Wilson, Detroit MI 48206	7/1/2020	6/30/2021	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)	82,500.00	Outreach program outside business hours focused on unsheltered persons.	11745 Rosa Parks Blvd. Detroit MI 48206	7/1/2020	6/30/2021	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	05S	Central City Integrated Health (RR)	20,000.00	Quickly rehouse families and individuals that are literally homeless.	10 Peterboro, Detroit, MI 48201	7/1/2020	6/30/2021	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)	55,000.00	NOAH lunch program and engagement for homeless and unsheltered persons.	23 East Adams Detroit MI 48226	7/1/2020	6/30/2021	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)	65,625.00	Provides shelter for families (male, female and children).	26 Peterboro Detroit MI 48201	7/1/2020	6/30/2021	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	03T	Community Home Support (RR)	30,000.00	Quickly rehouse families and individuals that are literally homeless.	2111 Woodward, Suite 608 Detroit MI 48201	7/1/2020	6/30/2021	Suitable Living Environment	Availability/Accessibility	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)	75,000.00	Outreach program outside business hours focused on unsheltered persons.	2111 Woodward, Suite 608 Detroit MI 48201	7/1/2020	6/30/2021	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	Community Social Services of Wayne County (ES)	26,250.00	Shelter provider for pregnant or parenting Detroit teens and their children.	9851 Hamilton Detroit MI 48202	7/1/2020	6/30/2021	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	Covenant House (ES)	42,750.00	Provides shelter for teens 18-24 years of age.	2959 MLK Blvd. Detroit MI 48208	7/1/2020	6/30/2021	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	03T	DRMM 3rd Street (ES)	41,625.00	Provides shelter for men	3535 Third Ave, Detroit, MI 48201	7/1/2020	6/30/2021	Suitable Living Environment	Availability/Accessibility	End Chronic Homelessness	People	60	Homeless person overnight shelter	Emergency shelter and transitional housing	X	N/A	N/A	N/A
CDBG	PSHL	LMC	03T	DRMM Genesis II Chicago (ES)	35,325.00	Provides shelter for women and families	12900 Chicago W, Detroit, MI 48227	7/1/2020	6/30/2021	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	03T	Freedom House (ES)	25,000.00	Provides services to political refugees.	Suppressed	7/1/2020	6/30/2021	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)	191,594.00	Counseling and financial assistance for those at-risk of homelessness.	613 Abbott Detroit MI 48226	7/1/2020	6/30/2021	Decent Housing	Affordability	End Chronic Homelessness	People	150	Homelessness prevention	Prevention	X	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	\$67,121
Legal Aid and Defender	\$191,594
Fair Housing Awareness	\$ 25,000
Neighborhood Legal Services (Wayne County)	\$ 50,000
United Community Housing Coalition	\$196,594
Total	\$530,309

RESOURCE	FUNDING AMOUNT
City Of Detroit General Fund	
Civil Rights Inclusion & Opportunity (CRIO) (Fair Housing complaints & outreach)	\$173,945

CITIZENS PARTICIPATION PLAN:

City of Detroit
Housing & Revitalization Department
Public Hearing 1
2020-24 Consolidated Plan, NRSA Renewal and 2020-21 Action Plan
Record of Public Hearing

Purpose: To receive citizen comments on the 2020-24 ConPlan/2020-21 Action Plan

Participants: **REPORTING AND COMPLIANCE SECTION**

Warren T. Duncan
Marlene Robinson
Jennifer Mahone

CITIZEN PARTICIPANTS

9 Individuals

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

Date & Time: October 23, 2019 4:30 pm – 6:30 pm

Summary:

The Housing & Revitalization Department staff conducted the hearing. Mr. Duncan provided hand-outs on the Consolidated Plan and the Annual Action Plan process, the prior year 2019-2020 actual CDBG/NOF sub-recipient awards and program descriptions. Mr. Duncan also presented a draft survey of what will be sent out to citizens and the draft Consolidated Plan timeline. Citizens were given the opportunity to comment and present their opinions and questions regarding the 2020-24 ConPlan/2020-21 Annual Action Plan process. There were 9 individual citizens and HRD staff in attendance.

There were 8 citizens that had questions/comments.

Question/Comment 1:

The 0% interest loan program should not be a loan program it should be a grant program made available for seniors who can't afford to rehab their own home. Will they be more home repair programs available instead of the 0% interest loan program?

Response to Question/Comment 1:

The 0% interest loan program was available to increase more participants with a component to leverage more funds through its revolving loan process. Also, if you live in a Neighborhood Revitalization Strategy Area (NRSA) there are benefits to qualify higher income residents due to the ability to go above 80% of the Area Median Income (AMI).

The City will continue to fund the Senior Home Repair program as well.

Question/Comment 2:

Is it possible to extend the window between the bid openings and closings?

Response to Question/Comment 2:

The City will allow a fair set amount of time for bids or any Request for Proposal Application for citizens, non-profits and developers to apply using HUD guidelines. However, the city also has deadlines to exhaust the grant funds timely.

Question/Comment 3:

I'm interested in buying what seems to be vacant houses on my block and can't get anyone at the city to find the owner. How can I purchase vacant houses or vacant land on my block? What is the process for commercial buildings?

Response to Question/Comment 3:

If the vacant land is adjacent to the house you already own, the City has a vacant lot program where you can purchase the lot adjacent to your house. If there are vacant houses on your block that you are interested in, you can contact our Detroit Land Bank for residential houses and our offices here at Housing and Revitalization Dept. for commercial properties.

Question/Comment 4:

When will there be another round of CDBG/NOF funds available?

Response to Question/Comment 4:

CDBG/NOF Request For Proposal Application is available annually. It is normally available during mid to late August. We notify the citizens and non-profit groups through e-blast, ads in the Detroit Free Press and on the City's website at: www.detroitmi.gov/hrd. Click on our department and click CDBG/NOF.

Question/Comment 5:

Will there be a PowerPoint presentation on this information and if so, how can I receive the slides?

Response to Question/Comment 5:

There is a PowerPoint presentation on an overview of the Consolidated Plan/Action Plan and our NRSA information. All presentations can be found on the City's website at: www.detroitmi.gov/hrd as well as our NRSA information. We also, can email you all of the information on this hearing and all future hearings upon your request.

Question/Comment 6:

Regarding the 0% loan program, will the City include insurance set aside to allow low income homeowners to be eligible for home repairs?

Response to Question/Comment 6:

One of the requirements to receive a loan to rehab your home is having current homeowners' insurance on your home. If the insurance agency won't insure your home unless you make the necessary repairs, the department will contact the insurance agency once you are approved for the loan and work out a contingent contract w/the insurance agency.

Question/Comment 7:

Is the City accepting applications for the Senior Home Repair Program and how much is it funded for this year?

Response to Question/Comment 7:

The application process is temporary closed until the list is exhausted, however, once they served quite a few on the list where it is manageable, the City will resume accepting applications. Contact our front desk to inquire about the status of the program. At this time the Budget is not finalized for the Senior Home Repair program, however, it is funded every year and in 2019, it was funded for \$2,061,791.

Question/Comment 8:

How can you find out if a vacant house is slated for Demolition? There are several dangerous vacant houses in my neighborhood that has been vacant for years. Who can you call to get them demolished?

Response to Question/Comment 8:

The City has a very extensive demolition plan for dangerous buildings in the neighborhoods. There are several routes you can take to notify the city of a dangerous vacant house in your neighborhood. You can contact our Building, Safety Engineering and Environmental Department (BSEED) to see if house is slated for demolition. You can contact your District Manager of the Department of Neighborhoods, or you can contact your City Council person that represents that district.

City of Detroit
Housing & Revitalization Department
Public Hearing 2
2020-24 Consolidated Plan, NRSA Renewal and 2020-21 Action Plan
Record of Virtual Public Hearing

Purpose: To receive citizen comments on the 2020-24 Consolidated Plan, NRSA Renewal and 2020-21 Action Plan

Participants: **REPORTING AND COMPLIANCE SECTION**
Warren T. Duncan
Marlene Robinson
Jennifer Mahone
Val Miller
Nicole Wyse
Lindsay Wallace
Michelle Bush – Corporate FACTS
Christopher Plummer – Corporate FACTS
Department of Neighborhood – District Managers 3 and 4

CITIZEN PARTICIPANTS

49 individuals

Location: City of Detroit, Department of Neighborhoods,
District 3 and 4 - Virtual Community Engagement Meeting
Detroit, MI 48226

Date & Time: August 25, 2020, 6:00 pm – 7:00 pm

Summary:

The Housing & Revitalization Department (HRD) staff conducted the virtual public hearing. The 2020 – 2024 Consolidated Plan, 2020 Annual Action Plan and the new NRSA boundaries was presented by Mr. Duncan and Corporate FACTS. In addition, the Annual Action Plan process, the prior year 2019 grant expenditures, actual CDBG/NOF sub-recipient awards, program descriptions, goals and accomplishments were presented. Citizens were given the opportunity to comment and present their opinions regarding the 5-year Consolidated Plan and new NRSA boundaries. The PowerPoint presentation was made available to the public on the City of Detroit, HRD website.

There were 49 individual citizens and HRD staff in attendance. There were 3 citizens that had questions/comments.

Question/Comment 1:

I want to find out about the NRSA application to determine what goes on in the community? What type of services and resources that you can provide? What is the project approval and proposal process? Is there any age requirement for the single family home repair?

Response to Question/Comment 1:

You can apply for funding. They're really one in the same. It's just that some of the resources are targeted towards NRSA, for example, the home repair program is eligible for all low income housing households across the city, but in those in NRSA areas non low income households could apply, but they are one in the same.

The senior home repair program that program is for seniors who are 62 years of age or older or 55 with a disability. The zero percent there is not an age requirement for that one. Our lead hazard program just requires you to have somebody under the age of six years old in your house. And if you're interested in any of those programs you can email us at HRDhomerepair@detroitmi.gov.

Question/Comment 2:

What does NRSA stand for? What does CDBG stand for? Are the grant funds available now? Are the grant funds for just for a district or the entire city? Are the grant funds available to people who are renting, who have a terrible things going on that a landlord won't fix in their house?

Response to Question/Comment 2:

A Neighborhood Revitalization Strategy area (NRSA) is a HUD designation that a city receives or ask for approval from HUD that allows them to target their resources and there's more flexible use of the CDBG funds under an NRSA designation. The Community Development Block Grant (CDBG) is one of the hub programs that the city receives grant funding to support community development activities and they receive about \$35 million a year in Community Development Block Grant funds.

This is an annual allocation. So the plan that we're developing now is for the next five years. This presentation and chart will be posted on the city's website. There is a chart that shows how much funding the city receives from HUD. The city receives about \$35 million in Community Development Block Grant funds. Those are the funds that have the most flexibility and provide the most variety of services. There's also about 7 Million that they receive annually in home money and it's just for housing and then 3 million in ESG is just for homelessness services and then 2.9 million is for housing opportunities for people with AIDS. A total about 50 million.

The Buildings and Safety Department is responsible for enforcing rental registration compliance and rental compliance. You may contact your District 3 Inspector.

Question/Comment 3:

Can you provide the email for HRD home repair information?

Response to Question/Comment 3:

The contact email for home repair is HRDhomerepair@detroitmi.gov.

City of Detroit
Housing & Revitalization Department
Public Hearing 3
2020-24 Consolidated Plan, NRSA Renewal and 2020-21 Action Plan
Record of Virtual Public Hearing

Purpose: To receive citizen comments on the 2020-24 Consolidated Plan, NRSA Renewal and 2020-21 Action Plan

Participants: **REPORTING AND COMPLIANCE SECTION**
Warren T. Duncan
Marlene Robinson
Jennifer Mahone
Val Miller
Nicole Wyse
Lindsay Wallace
Michelle Bush – Corporate FACTS
Christopher Plummer – Corporate FACTS
Department of Neighborhood, District Managers 1, 2, 5, and 6

Citizen Participants
166 individuals

Location: City of Detroit, Department of Neighborhoods,
District 1, 2, 5, 6 - Virtual Community Engagement Meeting
Detroit, MI 48226

Date & Time: September 2, 2020 6:00 pm –7:00 pm

Summary:

The Housing & Revitalization Department (HRD) staff conducted the virtual public hearing. The 2020 – 2024 Consolidated Plan, 2020 Annual Action Plan and the new NRSA boundaries was presented by Mr. Duncan and Corporate FACTS. In addition, the Annual Action Plan process, the prior year 2019 grant expenditures, actual CDBG/NOF sub-recipient awards, program descriptions, goals and accomplishments were presented. Citizens were given the opportunity to comment and present their opinions regarding the 5-year Consolidated Plan and new NRSA boundaries. The PowerPoint presentation was made available to the public on the City of Detroit, HRD website.

There were 166 individual citizens and HRD staff in attendance. There were 16 citizens that had questions/comments.

Question/Comment 1:

Can you provide a direct link of the NRSA map that will show the area around the new NRSA boundaries? I want to look at the map on my own to actually see the boundaries.

Response to Question/Comment 1:

The NRSA map will be posted on District 7 website. District 7 Facebook page will have a recording of the meeting. All District managers will be able to share link with residents. The PowerPoint presentation on an overview of the Consolidated Plan/Action Plan and our NRSA map information can be found on the City's website at: www.detroitmi.gov/hrd. We also, can email you all of the information on this hearing and all future hearings upon your request.

Question/Comment 2:

Can you provide the presentation and a map of new NRSA area? Last time my area was not in the NRSA area; we were just right outside of the designated area.

Response to Question/Comment 2:

The NRSA map will be posted on District 7 website. District 7 Facebook page will have a recording of the meeting. All District managers will be able to share link with residents. The PowerPoint presentation on an overview of the Consolidated Plan/Action Plan and our NRSA map information can be found on the City's website at: www.detroitmi.gov/hrd. We also, can email you all of the information on this hearing and all future hearings upon your request.

Question/Comment 3:

Previously in the NRSA area, there were the Slum and Blight areas. I do not see this area in the new NRSA mapping. Are the Slum and Blight area still apart of the NRSA area? What are the AMI focused on for the 45% of housing burdens that was mentioned in the presentation?

Response to Question/Comment 3:

The Slum and blight areas were designated by the City of Detroit and HUD. The slum and blight area was removed from the new NRSA map. We will add the slum and blight area back into the new NRSA map for clarity.

The housing burden really not necessarily related to income, although, what we are finding that lower income households are the ones that are more severely cost burden. There are standards that HUD puts out about how much you should be paying for your household expenses as compared to your household income. We use that data to determine, how many households are and what we would consider cost. Cost burden means a person is spending more than 30% of

their income on housing expenses and they're severely cost burden which is spending more than 50% on housing.

Question/Comment 4:

Question about your survey, how much effort went into possibly surfing the survey to the artist community? Did you have any concentrated efforts go into serving the artists community, young and old?

We have a planned artistic development. How welcoming is NRSA for new development that is affordable housing, provide services and training to the neighborhood?

Response to Question/Comment 4:

The surveys were broadly circulated by all kinds of emails. The District managers reminded people to fill out the surveys and all kind of outreach happen for people to the complete survey. I don't think that we specifically targeted a group like the artist community or artist organizations.

Affordable housing, public service and training are eligible activities. Throughout the five-year period, there are rounds of funding. We encourage you to stay abreast and come to your district meetings to know what's happening. Look on the HRD website so that you could keep up with what those opportunities are and apply when it comes available.

Question/Comment 5:

I have a question in regards to public buildings. We have a lot of abandoned schools in our neighborhoods. I happen to be a member of Third New Hope Baptist Church on the corner of Plymouth and Steel in the city of Detroit. We have an elementary disability school near us that's empty and we have George Parker elementary school across the street from us that's empty. Just wondering how are those funds being utilized or can they be utilized?

I understand the city has taken over the responsibility of the all empty schools. How available are funds to help support plans and ideas and strategies to turn existing facilities into viable repurposed buildings?

Response to Question/Comment 5:

The Department of Neighborhoods (DON's) are now currently doing a study of all of the school buildings to see which one can be saved. A cost analysis for these buildings. The DON's haven't moved to the process of how you buy them. There was a lot of transfers from Detroit Public School (DPS) to the city of Detroit.

Question/Comment 6:

I'm a concerned citizen. I'm also a young person. I like to let you know that on those particular school buildings (elementary disability school and George Parker elementary), I put in a proposal for a recreation center to open up or to get a grant to open up community center. City Council basically brushed me off.

Response to Question/Comment 6:

The Department of Neighborhoods are now currently doing a study of all of these school buildings to see which one can be saved. A cost analysis for these buildings. The DON's haven't moved to the process of how you buy them. The City do not own all school buildings. We have had a lot transfers from Detroit Public School (DPS) to the city of Detroit.

Question/Comment 7:

I have a question about the new boundaries. When can qualified NRSA neighborhoods start applying for funds? Do we have to wait until you submit your application and receive approval? I want to see clearly the zero percent loan NRSA area. Areas were not included before but they're included now. What changed and can we apply immediately?

Response to Question/Comment 7:

There's an application approval process. You will be able to take advantage of the new NRSA area application around December 2020.

If your household is below 80% AMI, no matter where you live in the city, you can apply. You don't have to be in a designated area. Only for neighborhoods that are for residents that are above 80% AMI. So, I don't want to give the impression that you can apply if you're not in an NRSA. You can if you fit within the income limits.

Question/Comment 8:

I wanted to speak about the community development block grant (CDBG). I reside in District Six. I actually had an appointment to complete my application for home repair, because of the street that I live on. Our foundations are cracking due to truck traffic. And it's creating quite a problem with water coming in because street floods and a whole bunch of different other things. So I wanted to know, do I need to remit, a new application?

Response to Question/Comment 8:

Your application was submitted before the pandemic (Covid-19). A HRD home repair Manager will follow-up with the status of your application. You will receive a call tomorrow. Please provide your address and contact information. We will make sure we take care of you and our apologies for the delay.

Question/Comment 9:

I'm a community partner (nonprofit). Can you do urban farms anywhere in the city or are there certain areas allocated for that? I reside in District 7. We have entire blocks that are empty except for a couple of abandoned houses. I also own property in District 4 where I want to do urban farming there too.

Response to Question/Comment 9:

If you are a community partner (nonprofit) you can buy vacant lots. You must get approval from block clubs, neighborhood associations and organizations. Please contact your District 4 and 7 managers about buying vacant lots. In addition, you may contact the Detroit Land Bank Authority to complete an application to purchase vacant lots not adjacent to home.

Question/Comment 10:

I want clarification about the NRSA boundaries. We are looking to put up a Fab Lab for the built environment in Detroit, centered around affordable housing and that will include a summer youth robotics program. I noticed that the SNF and the NRSA designations are close but they're not identical. If we wanted to qualify for a CDBG grant, does that mean we should look for blocks that are in both the SNF and NRSA area? We filed for our 501c3 determination, but have not received is back.

Response to Question/Comment 10:

Information regarding our upcoming workshop will be provided. You are welcomed to attend and register on Eventbrite for the Housing & Revitalization Department second public CDBG NOF workshop on Thursday, September 10, 2020 at 10:00 am

Question/Comment 11:

I reside in District Seven. I had the same interest as questionnaire # 9 (nonprofit), about urban farming. I live across the street from a vacant lot that I wanted to purchase. I would like to provide information to my urban farming on vacant lots purchasing experience.

Response to Question/Comment 11:

Inquiries can be directed to vacant lot manager at the Detroit Land Bank Authority. He can assist will be provided to complete an application to purchase vacant lots, not adjacent to home.

Question/Comment 12:

I live in District Six. I would like to know, how it is that you determine the population size? And who qualifies? I asked because we just found out that part of our district, even though is residential, has been slated by zone as industrial. Part of our population, I don't believe is being counted. I live between the boundaries of Livernois, Tireman, West Warren and Central. I don't think we've ever been included in any of this money and I wanted to know how we can finally be considered?

I'm also concerned about the home repair and the revitalization of our neighborhood. We have a very high number of land bank abandoned homes in our area that have never been demolished. We haven't had any demolition in the last 10 years and they're still standing. We have 17 homes on one block. I wanted to know how we can get in on some of the NRSA as well as other community development block grant money. We have a high number of seniors who have a very poor quality of life around here and nobody is addressing that.

Response to Question/Comment 12:

To determine population, the consultants used the last census information which also includes some residential blocks. Please keep in contact with your District Manager for notices about NRSA and CDBG grant funding opportunities for your residential area. Please complete your Census 2020 form.

Question/Comment 13:

I have a couple of issues that I would like to talk to someone offline in the zip codes 48227 and 48228.

Response to Question/Comment 13:

This information is for you and everybody on the call. To receive information about your home and neighborhood, you can go to the city's homepage and enter your address into the address field. You can report and see your neighborhood issues on this website. The website also provides garbage collection, bulk, recycle, city council, district manager, and your neighborhood police precinct.

Question/Comment 14:

I understand that you can apply online on the city's web page and download the zero percent loan intake form. I also know that applications opened up in March. My question is there a deadline for getting the home repair applications in? And is there a certain number of applications that are being accepted. Is there a threshold?

Response to Question/Comment 14:

This is a continuing home repair open application program.

Question/Comment 15:

I reside in District Seven. I had the same interest as questionnaire # 9 (nonprofit), about urban farming. I live across the street from a vacant lot that I wanted to purchase. I would like to provide information to my urban farming on vacant lots purchasing experience.

Response to Question/Comment 15:

Inquiries can be directed to vacant lot manager at the Detroit Land Bank Authority. He can assist will be provided to complete an application to purchase vacant lots, not adjacent to home.

Question/Comment 16 (received via email):

I am the Housing Resource Intake Coordinator at the Neighborhood Resource Hub at Jefferson East Inc. and was at the online meeting. I have a few questions. Does the Five Year Consolidated Plan Proposal for 2020-2024, as of right now, include any funding for the SER Grant (Senior Emergency Repair)? Is there a current status update for Detroit's SER? How does one get on the waiting list? Is the max amount still \$15,000? Is there currently any funding available? Some seniors that I speak with have extremely low income (0-30% AMI) and would not qualify for the 0% Home Loan, even with great credit and financial counseling.

Response to Question/Comment 16:

There is a waiting list of just under 3,000 people. They can call HRD directly at 313-224-6830 or email HRDHomeRepair@detroitmi.gov. The max amount is \$15,000.00. There is currently funding available, this FY we received \$2.5M in CDBG and \$2.5M in CARES CDBG funding, this is expected to serve around 400 households. We do have Seniors who are around the 30% AMI range that have received 0% loans, I would encourage them to try to apply. In addition, if they have a child under 6 living in the home or visiting the home regularly (maybe they provide childcare?) they are eligible for the Lead Grant. They can call or email to check.

City of Detroit
Housing & Revitalization Department
CDBG/NOF 2020 Subrecipient Workshops
2020 Annual Action Plan
Record of Public Meetings

Purpose: To receive responses on process improvements and provide technical assistance to CDBG sub recipients.

Participants: **Neighborhood Opportunity Fund Section**

Tamra Fontaine

Gordon Pearson

Mandy Valentine

Kerry Baitinger

Citizen Participants (non-profit organization)

152 individuals

Location: Durfee Innovation Society, 2470 Collingwood, Detroit, MI 48206
Butzel Family Center, 7737 Kercheval, Detroit, MI 48214

Dates: August 21 and September 7, 2019

Summary:

The Housing & Revitalization Department staff conducted the 2020-2021 CDBG proposal workshops. Neighborhood residents, block clubs and community organizations who wish to participate in the development and implementation of CDBG projects; and apply for funding are invited to the workshops. The workshops focused on data collection, reimbursement procedure, clearances, best practices and the proposal evaluation procurement processes.

Questions/Comments:

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 regulations, and how to measure impact.

Response to Questions/Comments:

During each NOF specific workshop there is a question and answer (Q & A) session. The Neighborhood Opportunity Fund staff gave feedback and responded to all citizen questions. All presentation slides were available for public review on Housing & Revitalization Department website, www.detroitmi.gov/hrd.

City of Detroit
Housing & Revitalization Department
2020 Emergency Solutions Grant Subrecipient Workshops
2020 Annual Action Plan
Record of Public Meetings

Purpose: To receive responses on process improvements and provide technical assistance to ESG sub recipients.

Participants: **Emergency Solution Grant**

Terra Linzner
Sarmed Jabra
Alexis Alexander
Lauren Licata
Laura Urteaga-Fuentes

Citizen Participants (non-profit organization)

204 individuals

Location: Virtual - Workshop and Q & A Session

Dates: June 19 and June 23, 2020

Summary:

The Housing & Revitalization Department staff conducted the 2020 – 2021 ESG proposal and question and answer session. Community organizations who wish to participate in the development and implementation of ESG projects; and apply for funding are invited to the workshops. The workshops focused on data collection, reimbursement procedure, clearances, regulations and the proposal evaluation procurement processes.

Question/Comment:

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

Response to Question/Comment:

During each specific workshops there was a question and answer (Q & A) session. The Emergency Solutions Grant (HRD) staff gave feedback and responded to all citizen questions. All presentation slides were available for public review on Housing & Revitalization Department website, www.detroitmi.gov/hrd.

MICHAEL E. DUGGAN, MAYOR
CITY OF DETROIT
HOUSING AND REVITALIZATION DEPARTMENT

**NOTICE OF REQUEST FOR 2020-2021 COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)
NEIGHBORHOOD OPPORTUNITY FUND (NOF) PROPOSALS,
CDBG/NOF WORKSHOP AND CONSOLIDATED PLAN PUBLIC HEARING**

The City of Detroit invites community organizations and others to submit proposals for projects to be funded by the 2020-2021 Community Development Block Grant/Neighborhood Opportunity Fund (CDBG/NOF) program. All community organizations, human service organizations, non-profit organization etc. who wish to participate in the development and implementation of NOF projects as advisors and/or as operating agencies may submit proposals.

This year all 2020-2021 CDBG/NOF proposals must be prepared and submitted online using the City's "BidSync" system. Proposal applicants must register on BidSync before a proposal can be submitted. **Proposals must be submitted via BidSync by 4:00 pm on Monday, October 7, 2019.** Paper copies of Proposals will not be accepted. To obtain information regarding BidSync, go to www.bidsync.com.

Proposals submitted by the **Monday, October 7, 2019**, deadline will be evaluated by city agencies. *Late proposals will not be accepted.* Funding approval, for proposals, will be determined by the Mayor and City Council.

The 2020-2021 Neighborhood Opportunity Fund proposal packages with the required proposal forms will be available via BidSync on **Friday, September 6, 2019.**

ONSITE CDBG/NOF WORKSHOP

The Housing and Revitalization Department (HRD) in conjunction with the City Planning Commission (CPC) will conduct two CDBG/NOF "Proposal Workshops" to present details and answer questions regarding Neighborhood Opportunity Fund RFP. Workshop 1 occurred on Wednesday, August 21, 2019. The next workshop will occur as shown below:

Onsite Workshops
<i>Proposal/Workshop 1</i> Wednesday, August 21, 2019, at 5:00pm Durfee Innovation Society 2470 Collingwood Detroit, MI 48206
<i>Proposal/Workshop 2</i> Saturday, September 7, 2019, at 10:00am Butzel Family Center 7737 Kercheval Detroit, MI 48214

Workshop materials will be available on the City's website at <http://www.detroitmi.gov/hrd> from there click on, For Nonprofits and Community Groups and **NOF Application Overview/Documents, on August 21, 2019.** The workshops are designed to help community groups and others prepare their CDBG/NOF proposals. According to proposal criteria, a community group representative **must attest** to attending a workshop to be eligible for funding (see proposal signature page).

BACKGROUND

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

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

The City's current Consolidated Plan covers the period from 2020-2024. The City is in the process of preparing its 2020-2021 Annual Action Plan update. The 2020-2021 Annual Action Plan is the first year of the 2020-2024 Consolidated Plan.

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

Public Hearing 1 Wednesday, October 23, 2019 4:30 PM - 6:30 PM Housing and Revitalization Department Coleman A. Young Municipal Center (CAYMC) 2 Woodward Ave., Suite 908 Detroit, MI 48226

During the public hearings, HRD staff will describe the contents of past plans and the types of activities that may be undertaken using 2020-2021 Annual Action Plan program funds. Hearing participants are given an opportunity to ask questions and present their opinions regarding Consolidated Plan processes and activity types that can be included in the Annual Action Plan. The hearing will focus on these matters, and is not held to discuss funding for particular organizations. Citizens may also submit comments by letter (at the address shown below), appointment, telephone or email at ConPlanComments@detroitmi.gov on or before May 15, 2020. This notice will be posted on the following City of Detroit website at: <http://www.detroitmi.gov/hrd> from there click on, **Archives/Reports/Resources**.

For further information, contact:

Tamara F. Hardy
Housing and Revitalization Department
2 Woodward Avenue
Detroit, MI 48226
Telephone: 313-224-6380

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

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METRO

134 dogs, some in poor health, seized from U.P. puppy mill

Chanel Stitt Detroit Free Press
USA TODAY NETWORK

A police call for a horse in the road turned into a puppy mill bust involving 134 dogs in the Upper Peninsula.

The dogs were retrieved by the Michigan State Police, Delta County Sheriff Department and the Delta Animal Shelter from a residence in Maple Ridge Township of Delta County.

Here's what the Michigan State Police reported.

Troopers arrived to find some of the dogs to be of poor health and malnourished. Police retrieved 65 adult dogs and 69 puppies, which are now being evaluated and cared for at the Delta Animal Shelter. Many of the dogs were pregnant, or had a recent litter of puppies.

The Delta Animal Shelter has received an overwhelming response about the puppies

and dogs that they received, said the shelter on Facebook.

"We will be putting out a request for foster, bathers, walkers, socializers, cleaners, toward the end of the week," said the shelter. "These poor pups are so scared."

The post goes on to state: "At this time we are focusing on getting them medically cared for. They are all going to be just fine and we promise they are on their way to such a better life. No dog should ever live that way ever."

The shelter told UpNorthLive that the dogs include yellow, black, white, chocolate Labs, Goldens, standard poodle, goldendoodles, Australian shepherds, Aussie doodles, mini Aussies, German shepherds, Yorkies, teddy bears, pit, Chihuahuas and Boston terriers.

Possible criminal charges for the puppy mill owner are under consideration by the Delta County Prosecutor's Office.

Chanel Stitt is a Freep Now Intern at the Detroit Free Press. Become a subscriber.

MICHAEL E. DUGGAN, MAYOR CITY OF DETROIT HOUSING AND REVITALIZATION DEPARTMENT

NOTICE OF REQUEST FOR 2021-2022 COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) NEIGHBORHOOD OPPORTUNITY FUND (NOF) PROPOSALS, CDBG/NOF WORKSHOP, AND CONSOLIDATED PLAN PUBLIC HEARING

The City of Detroit invites community organizations and others to submit proposals for projects to be funded by the 2021-2022 Community Development Block Grant/Neighborhood Opportunity Fund (CDBG/NOF) program.

All community organizations, human service organizations, non-profit organization etc. who wish to participate in the development and implementation of **NOF projects** as advisors and/or as operating agencies may submit proposals

This year, all 2021-2022 CDBG/NOF proposals must be prepared and submitted online using the City's "Oracle" system. Proposal applicants must register on Oracle before a proposal can be submitted. Proposals must be submitted via Oracle by **4:00 pm on Friday, October 9, 2020**. Paper copies of Proposals will not be accepted. To obtain information regarding Oracle, please visit the City of Detroit Office of Contracting and Procurement webpage.

Proposals submitted by the **4:00 pm, Friday, October 9, 2020**, deadline will be evaluated by city agencies. Late proposals will not be accepted. Funding approval for proposals will be determined by the Mayor and City Council.

The 2021-2022 CDBG/NOF proposal packages with the required proposal forms will be available via Oracle on **Wednesday, September 9, 2020**.

VIRTUAL CDBG/NOF WORKSHOP

The Housing and Revitalization Department (HRD) will conduct two CDBG/NOF "Proposal Workshops" to present details and answer questions regarding Neighborhood Opportunity Fund RFP. The workshops will be held as shown below:

Virtual Workshops
Proposal Workshop 1 Wednesday, August 19, 2020 @ 10am Registration Link https://www.eventbrite.com/e/115505448907
Proposal Workshop 2 Thursday, September 10, 2020 @ 10am Registration Link https://www.eventbrite.com/e/115506841071

Workshop registration information can be obtained by visiting HRD Website <http://www.detroitmi.gov/hrd>.

Workshop materials will be available on the City's website at <http://www.detroitmi.gov/hrd>, from there click on, "For Nonprofits and Community Groups" and **NOF Application Overview/Documents**. The workshops are designed to help community groups and others prepare their CDBG/NOF proposals. According to proposal criteria, a community group representative **must attest** to attending a workshop to be eligible for funding (see proposal signature page).

BACKGROUND

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

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

The City's last Consolidated Plan covered the period from 2015-2020. The City is in the process of preparing the 2020-2025 Consolidated Plan and the Neighborhood Revitalization Strategy Area (NRSA) renewal.

There will be (2) virtual community public hearings held to obtain citizens input necessary for the Consolidated Plan and NRSA development. This year the meetings will be held as shown below.

Public Hearing 1 Tuesday, August 25, 2020 6:00 PM – 6:30PM Registration information can be obtained by visiting HRD website at: www.detroitmi.gov/hrd (click on HUD Consolidated Plans)
Public Hearing 2 Wednesday, September 02, 2020 6:00 PM – 7:00PM Registration 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. Also, our consultants will present the citizens survey results and the new NRSA boundaries for the NRSA renewal application to HUD. 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 hearing will focus on these matters, and is not held to discuss funding for particular organizations. Citizens may also submit comments by email at ConPlanComments@detroitmi.gov on or before October 15, 2020. This notice will be posted on the City of Detroit website at: <http://www.detroitmi.gov/hrd> from there click on, Archives/Reports/Resources.

For further information, contact:

Tamra F. Hardy
 Housing and Revitalization Department
 2 Woodward Avenue
 Detroit, MI 48226
 Telephone: 313-224-6380

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

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

METRO

U-M president acknowledges trust issues on campus

David Jesse Detroit Free Press
USA TODAY NETWORK

University of Michigan President Mark Schlissel acknowledged Tuesday a lack of trust

from the campus community in his leadership, even as he pledged to rebuild it.

"I really feel stronger and stronger an erosion of trust across the campus and I'm looking for ways to rebuild the trust so we that we can

tap into our unanimity of the institution," said Schlissel, speaking on a special town hall-style broadcast. "What I'm going to do is more of what we just did. There are many perspectives across campus. I need to do more communicating with different types of people to understand the collective vision. The thing I walk away from this with is the value of listening."

The broadcast featured Schlissel and U-M Provost Susan Collins, the university's chief academic officer, both answering questions from Scott Page, a faculty member in the College of Literature, Science, and the Arts and Stephen M. Ross School of Business.

It comes as U-M finds itself in turmoil. The union representing graduate student instructors and assistants is entering the second week of a strike, as are student residence hall workers. Faculty are poised to consider a no confidence vote against Schlissel on Wednesday afternoon for his handling of return-to-campus plans. Football players, coaches — including head football coach Jim Harbaugh — player families and fans are critical of Schlissel for voting to suspend the Big Ten football season. Students are upset about poor conditions in quarantine housing and about a now-scrapped plan to send armed police officers into off-campus student housing neighborhoods to enforce no-party policies.

Page asked pointed questions repeatedly throughout the one-hour event, including asking the duo — the university's highest ranking administrators — about why students and faculty came back to campus this fall to find no significant work done or projects ready to go on

issues of systematic racism.

"We deserve that criticism," Collins said. "We were slow."

Schlissel offered a defense of that slowness, saying that with all the work of figuring out how to restart the semester, those issues got "crowded out."

Page also questioned why the university brought students back to campus for classes, even as about 80% of undergraduate classes are being offered online.

Equity issues, Schlissel replied.

"There is a real equity issue while fully remote," he said. "Not all students are just living in town and having a good time. We are also providing resources like internet and a safe environment for students who need that in addition to an education."

Schlissel did not say he made a mistake in getting students back to campus, but said he would have changed his approach.

"One of the errors that I made was that I took a very expert-focused approach that became narrow," he said. "If I had it to go back I would take a broader, more inclusive approach that factored in the breadth of university input."

Page ended the event by recalling how he came to U-M as a student decades ago from a small town and how it had shaped who he became.

"I care deeply about this place. It's on you to keep it going."

Contact David Jesse: 313-222-8851 or djesse@freepress.com. Follow him on Twitter: @reporterdavidj.

CITY OF DETROIT
HOUSING AND REVITALIZATION DEPARTMENT
MICHAEL E. DUGGAN, MAYOR
SUMMARY AND NOTICE OF THE DRAFT 2020 CONSOLIDATED PLAN/ANNUAL ACTION PLAN
Coleman A. Young Municipal Center (CAYMC)
Housing and Revitalization Department
2 Woodward Avenue, Suite 908
Detroit, MI 48226

INFORMATION AND PUBLIC REVIEW
This notice provides a summary of the 2020-2024 Draft Consolidated Plan and the 2020-2021 Annual Action Plan. The Draft Consolidated/Annual Action Plan and funding recommendations will be available for public review beginning September 16, 2020 to October 16, 2020 online at: <http://www.detroitmi.gov/hrd> Click on HUD Consolidated Plan, Action Plans & CAPERS. During this time, citizens may obtain information, view and submit comments regarding the 2020-2024 Draft Consolidated Plan and 2020-2021 Action Plan. Citizens may also submit comments by letter (at the address shown below) or by e-mail at ConPlanComments@detroitmi.gov on or by October 16, 2020. For further information, please contact:

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

BACKGROUND
The 2020-2024 HUD Consolidated Plan is a five-year Strategic Plan with annual Action Plan updates. The Strategic Plan describes the needs, conditions, goals, objectives, priorities, strategies, resources and programs related to community development, affordable housing, the homeless, and persons with special needs, including persons living with HIV/AIDS. The 2020-2021 program year marks the 1st year of the annual Action Plan for the 2020-2024 Consolidated Plan.

The Draft 2020-2021 Action Plan is the City of Detroit's annual funding application for the following HUD funded programs:
• Community Development Block Grant (CDBG)
• HOME Investment Partnership (HOME)
• Emergency Solutions Grant (ESG)
• Housing Opportunities For Persons With AIDS (HOPWA)

SUMMARY OF THE 2020-2024 HUD CONSOLIDATED PLAN AND 2020-2021 DRAFT ACTION PLAN CONTENTS
The HUD Consolidated Plan contains the following major sections with discussions in the following:
• Executive Summary • Strategic Plan
• The Process • Annual Action Plan
• Needs Assessment • Certifications
• Market Analysis

EXECUTIVE SUMMARY

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

THE PROCESS

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

NEEDS ASSESSMENT

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

MARKET ANALYSIS

The Market Analysis section includes the following discussions:
• Number of Housing Units • Special Needs Facilities and Services
• Cost of Housing • Barriers to Affordable Housing
• Condition of Housing • Non-Housing Community Development Assets
• Public and Assisted Housing • Needs and Market Analysis Discussion
• Homeless Facilities

STRATEGIC PLAN

The Strategic Plan includes the following discussions:
• Geographic Priorities • Public Housing Accessibility and Involvement
• Priority Needs • Barriers to Affordable Housing
• Influence of Market Conditions • Homelessness Strategy
• Anticipated Resources • Lead Based Paint Hazards
• Institutional Delivery Structure • Anti-Poverty Strategy
• Goals • Monitoring

ANNUAL ACTION PLAN

The Annual Action Plan includes the following discussions:
• Expected Resources • Homeless & Other Special Needs
• Annual Goals and Objectives • HOPWA Goals
• Projects • Barriers to Affordable Housing
• Geographic Distribution • Other Actions
• Affordable Housing • Program Specific Requirement
• Public Housing

FEDERAL RESOURCES

City of Detroit Action Plan revenues for 2019-2020 and revenues for 2020-2021 are shown below:

Program	2019-2020 Revenue	2020-2021 Revenue
CDBG Entitlement	\$34,516,333	\$35,285,455
CDBG Program Income	\$0	\$0
CDBG Subtotal	\$34,516,333	\$35,285,455
HOME	\$6,737,568	\$7,269,293
HOME Program Income	\$0	\$0
ESG	\$2,917,168	\$3,032,870
HOPWA	\$2,825,867	\$2,903,135
Grand Total	\$46,996,936	\$48,490,753

2020-2021 DRAFT ACTION PLAN FUNDING RECOMMENDATIONS

Listed below are the Mayor's 2020-2021 funding recommendations by program categories for CDBG, ESG, HOME, and HOPWA grants

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)			HOME INVESTMENT PARTNERSHIP		
Activity Category	ADPLN	2020-2021 Draft Allocations	Activity Category	ADPLN	2020-2021 Draft Allocations
ADMIN AND PLANNING (ADPLN)	ADPLN	\$6,907,761	ADMIN AND PLANNING (ADPLN)	ADPLN	\$726,929
DEMOLITION (DEMO)	DEMO	\$1,026,044	HOME Projects		\$6,542,364
ECONOMIC DEVELOPMENT (ED)	ED	\$1,500,000	Program Income	PI	\$0
HOMELESS PUBLIC SERVICE (HPS)	HPS	\$2,459,289			
HOME REPAIR (HR)	HR	\$9,571,386			
PUBLIC FACILITY REHAB (PFR)	PFR	\$2,322,699			
PUBLIC SERVICE	PS	\$4,333,528			
PRE-DEVELOPMENT AFFORDABLE HOUSING	DVLPT	\$1,200,000			
SECTION 108 LOANS (REPAY)	Repay	\$5,964,748			
TOTAL CDBG		\$35,285,455	TOTAL HOME		\$7,269,293

EMERGENCY SOLUTIONS GRANTS (ESG)			HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS (HOPWA)		
Activity Category	ADPLN	2020-2021 Draft Allocations	Activity Category	ADPLN	2020-2021 Draft Allocations
ADMIN AND PLANNING (ADPLN)	ADPLN	\$227,465	ADMIN AND PLANNING (ADPLN)	ADPLN	\$87,094
ESG Projects		\$2,805,405	HOPWA Projects		\$2,816,041
TOTAL ESG		\$3,032,870	TOTAL HOPWA		\$2,903,135

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

DF-0000357214

University files injunction to bring halt to strike

Slone Terranella Detroit Free Press
USA TODAY NETWORK

The University of Michigan filed a complaint and motion in Washtenaw County Circuit Court on Monday, requiring the Graduate Employee Organization to return to work.

U-M is seeking a temporary restraining order and preliminary injunction against the graduate instructors union's strike. On Sunday, 80% of union members voted to extend the strike, which started on Sept. 8, for another five days.

"Going to the court was our only choice after learning the strike would continue. We'd much rather our classes be in session while we work out our differences," U-M President Mark Schlissel said in a video.

If the court grants the injunction, GEO members — who refuse to work — could be held in contempt of court, according to a university statement. The group could also face civil damages because of the strike, which violates the union's contract with U-M.

The union released a response statement on Monday saying no individual member is at risk because of the injunction and the group knew legal action was a possibility.

"We're disappointed that President Schlissel has chosen to immediately abandon these promises in favor of trying to shut down our strike by brute force," the statement said. "Shame on the University of Michigan for using their immense resources to bully their graduate workers out of striking — instead of using those same resources to create a safe and just campus for all."

According to the U-M court filings, "Not only

are GEO's members interfering in the university's mission to educate students by unlawfully withholding their labor, they are encouraging impressionable undergraduate students, over whom they exercise significant authority, to forego their education."

On Sept. 8, the university also filed an unfair labor practice charge against the union through the Michigan Employment Relations Commission. This demands the union "cease and desist from unlawfully striking or conducting a work stoppage against the University of Michigan."

U-M spokesperson Rick Fitzgerald said there's been no ruling on either case yet.

The union is demanding better transparency for COVID-19 testing, a universal remote option to work, child care subsidies, a repeal of the \$500 international student fee and a demilitarized campus.

The group is also asking for more graduate student support through degree timeline extensions and funding, a \$2,500 emergency grant, rent freezes and flexible leases for on-campus housing, according to GEO's website.

On Wednesday, U-M faculty will vote on a motion of no confidence regarding the university's reopening and COVID-19 plan, according to the Michigan Daily.

U-M currently offers a mixture of face-to-face and remote classes for students. Twenty-two percent of undergraduate credit hours are being taught with an in-person component, according to university officials, and three-quarters of graduate students are teaching remotely.

Contact Slone Terranella: sterranella@freepress.com

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

September 16, 2020
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 October 2, 2020, 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 Community Development Block Grant (CDBG) funds authorized under Title I of the Housing and Community Development Act of 1974 (Public Law 93-383), to undertake a project known as:

Project Title: The NSO Service Project located at 3364 Mack Avenue, 3426 Mack Avenue, 3434 Mack Avenue, 3409 Ludden Street and 3421 Ludden Street, Detroit, Michigan.

Purpose: The project includes construction of a new 56-bed shelter in Detroit, Michigan. The purpose of the project is to provide the tools, resources and education to connect residents with job opportunities and Permanent Supportive Housing in the City of Detroit.

Mitigation Measures/Conditions/Permits: 1. A No Further Action approval letter is required by the Michigan Department of Environment, Great Lakes and Energy prior to construction. 2. Hours of construction shall be in accordance with local code to mitigate temporary construction phase noise.

FUNDING
CDBG - \$660,000

FINDING OF NO SIGNIFICANT IMPACT

The City of Detroit has determined that the project 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. Additional project information is contained in the Environmental Review Record (ERR) on file at Housing and Revitalization Department at the Coleman A. Young Municipal Center (CAYMC), Suite 908, Detroit, MI, 48226. The records are available for public examination and copying, upon request, on weekdays from 9:00 a.m. to 4:00 p.m.

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: 313.224.2933 or email: dwoinenp@detroitmi.gov. All comments received by October 1, 2020 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 Mr. Donald Rencher, in his 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, Detroit Field Office, U.S. Department of Housing and Urban Development, 477 Michigan Avenue, 16th Floor, Detroit, Michigan, 48226. Please submit objections to CPD_COVID19OEE-DET@hud.gov. Potential objectors should contact Ms. Kathy Bagley at 313.234.7321 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.

Mr. Donald Rencher, Director, Housing and Revitalization Department, City of Detroit

DF-0000357202



**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) 2020-2024 Consolidated Plan/2020-2021 Annual Action Plan and Neighborhood Revitalization Strategy Area (NRSA) renewal.

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)

2020 - 2024 HUD Consolidated Plan/ Annual Action Plan and Neighborhood Revitalization Strategy Area (NRSA)

The City of Detroit will hold 2 joint virtual public hearings with the Department of Neighborhoods on the 2020-2024 Consolidated Plan/2020-2021 Annual Action Plan and NRSA (renewal) for community residents, organizations and stakeholders.

Districts 3 and 4 Virtual Meeting

**Tuesday, August 25, 2020
6 - 6:30 p.m.**

Join via ZOOM

<https://cityofdetroit.zoom.us/j/93947894155>

**Meeting ID: 939 4789 4155
Call in option: (312) 626-6799**

Districts 1, 2, 5, 6 & 7 Virtual Meeting

**Wednesday, September 2, 2020
6 - 7 p.m.**

Join via ZOOM

<https://cityofdetroit.zoom.us/j/96649691345>

**Meeting ID: 966 4969 1345
Call in option: (312) 626-6799**

Meeting Outline

- Overview of the Consolidated/Annual Action Plan including funding allocations
- Community residents, organization, and stakeholders survey results
- NRSA past accomplishments
- NRSA renewal new boundary areas



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

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Section 1: General Information and Background

Purpose of This Document

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

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

How to Use This Document

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

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

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

Guiding Principles

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

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

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

What is ESG?

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

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

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

City of Detroit Contact Information

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

Phone: 313.224.6380

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

Frequently Used Terms and Definitions

Americans with Disabilities Act (ADA) Compliance

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

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

Continuum of Care

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

Definitions of Homelessness

Category 1: Literally Homeless

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

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

Category 2: Imminent Risk of Homelessness

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

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

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

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

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

Category 4: Fleeing/Attempting to Flee Domestic Violence

Any individual or family who:

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

Definition of Chronically Homeless

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

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

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

Developmental Disability

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

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

Disabling Condition

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

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

Emergency Shelter

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

Equal Access

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

Federal Fair Housing Act

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

Fair Market Rent (FMR)

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

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

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

Family/Household

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

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

Clarity on the Definition of Family

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

Housing First

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

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

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

Homeless Management Information System (HMIS)

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

Low-Barrier

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

Permanent Housing (PH)

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

Permanent Supportive Housing (PSH)

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

Rapid Re-Housing (RRH)

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

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

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

Rent Reasonableness

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

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

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

Rent Reasonableness and Fair Market Rent (FMR)

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

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

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

Subrecipient

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

Transitional Housing (TH)

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

Victim Service Providers

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

Section 2: Funding Process and Requirements

Summary

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

Grant Awards and Spending Requirements

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

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

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

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

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

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

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

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

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

Payments should be delivered to the following address:

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

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

Eligible Subrecipients

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

Subrecipient Requirements

All City of Detroit ESG subrecipients must:

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

Leadership & Management

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

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

HUD Requirements

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

Other HUD Requirements

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

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

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

Match Requirements

Federal Requirements

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

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

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

Eligible types of matching funds are as follows:

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

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

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

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

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

Subrecipient Requirements

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

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

Documenting Match Requirements

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

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

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

Section 3: Coordinated Entry Systems

Summary

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

The details of these expectations are outlined below:

CAM Liaisons

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

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

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

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

Prevention Provider

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

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

Street Outreach Provider

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

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

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

Coordinated Assessment Model (CAM) Processes for Linkage to Shelter

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

Making a CAM referral

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

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

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

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

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

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

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

CAM Coordination Expectations

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

CAM Coordination Related to Housing Choice Vouchers (HCV)

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

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

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

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

Rapid Re-Housing (RRH) Providers

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

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

Written Standards Requirements

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

Section 4: Principles of Best Practice

Summary

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

Equal Access to Housing Regardless of Sexual Orientation or Gender Identity

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

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

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

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

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

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

[HUD Exchange LGBT Homelessness Page](#)

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

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

Reasonable Accommodations/Modifications

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

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

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

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

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

Americans with Disabilities Act (ADA) Compliance

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

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

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

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

Low-Barrier

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

What does it look like in action?

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

What it is not:

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

Federal Fair Housing Act

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

Termination of Assistance

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

The process must recognize the rights of the individuals affected and subrecipients must exercise judgment and examine all extenuating circumstances when determining which violations warrant termination. Assistance should only be terminated in the most severe cases.

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

Client Confidentiality and Privacy Policies

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

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

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

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

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

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

Homeless Management Information Systems (HMIS) Requirements

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

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

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

Section 5: Overview of ESG Program Components

Summary

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

Program Components

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

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

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

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

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

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

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

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

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

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

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

Section 6: Outreach and Housing Navigation

Summary

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

Guidelines for Outreach and Housing Navigation Best Practice

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

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

NEW

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

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

Code Blue Situations

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

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

NEW

Outreach and Housing Navigation Components

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

Street Outreach Component

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

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

Navigation Component:

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

NEW

Performance Benchmarks

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

Street Outreach:

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

Navigation:

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

Outreach and Housing Navigation Eligible Activities

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

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

Per the ESG Interim Rule the six eligible activities are:

Engagement

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

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

Case Management

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

Emergency Health Services

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

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

Emergency Mental Health Services

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

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

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

Transportation

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

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

Services for Special Populations

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

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

Outreach and Housing Navigation Client Files

General Program Documentation

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

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

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

Other Documentation

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

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

Section 7: Emergency Shelter

Summary

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

Goals of Emergency Shelter

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

Eligible Emergency Shelter Activities

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

Shelter Provider Expectations

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

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

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

Performance Benchmarks

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

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

NEW

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

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

Expectations for Shelter Staff Training

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

- HUD Regulatory Requirements
- ESG Regulatory Requirements
- Housing First

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

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

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

Involuntary Family Separation

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

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

ESG Interim Rule language on family separation:

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

Types of Emergency Shelters

Single-Sex Shelters

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

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

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

Warming Centers

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

Family Shelter

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

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

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

Essential Services

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

Case Management

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

The cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant is eligible. Component services and activities consist of:

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

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

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

Childcare

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

Education Services

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

Employment Assistance and Job Training

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

Outpatient Health Services

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

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

Legal Services

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

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

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

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

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

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

Life Skills Training

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

Mental Health Services

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

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

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

Substance Abuse Treatment Services

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

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

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

Transportation

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

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

Services for Special Populations

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

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

Renovation/Rehabilitation of Buildings

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

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

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

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

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

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

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

Shelter Operations

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

Health and Safety Protocol

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

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

Essential Services and Shelter Operations

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

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

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

Minimizing Displacement

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

Temporary Relocation Not Permitted

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

Relocation Assistance for Displaced Persons

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

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

Displaced Person

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

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

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

A person does not qualify as a displaced person if:

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

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

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

Shelter Habitability and Lead Requirements

Emergency Shelter

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

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

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

Lead-Based Paint Requirements

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

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

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

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

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

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

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

Emergency Shelter Operational Policies

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

Religion

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

Service Animals

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

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

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

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

Additional reasons for service animal denial

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

Shelter policy should include the following:

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

Shelter Resident Death

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

In case of death, staff should:

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

Shelter Resident Personal Belongings

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

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

Shelter Resident Money and Valuables

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

Shelter Resident Prescription Medications

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

Substance Use

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

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

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

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

Manufacturing, Distribution or Sales

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

Weapons

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

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

Violent Behavior

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

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

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

Shelter Policy may read:

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

Intake Procedures for Emergency shelters

Hours of Operation

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

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

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

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

Intake Procedures

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

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

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

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

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

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

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

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

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

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

Provision of Services

Case Management Services

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

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

Special Population Considerations

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

Serving Unique Populations

Families with School-Aged Children

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

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

Mandated Reporting

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

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

Criminal History

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

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

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

Alcohol and Substance Use and Abuse

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

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

HIV/AIDS

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

Universal precautions include:

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

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

Exit Policies for Shelter Residents

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

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

Warnings

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

Daily Assessments

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

Suspension

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

Ban

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

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

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

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

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

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

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

Participant Discharge/ Termination of Assistance

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

Discharge Procedure

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

Discharge may occur when the person in housing crisis:

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

Detroit emergency shelters should consider implementing the following:

Discharge Checklist

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

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

Closing Summary

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

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

Involuntary Discharge

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

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

Appeal Process

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

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

Emergency Shelter Client Files

General Program Documentation

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

Required File Documentation

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

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

Other Emergency Shelter Documentation

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

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

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

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

Section 8: Homelessness Prevention and Rapid Re-Housing Introduction

Summary

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

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

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

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

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

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

Section 9: Homelessness Prevention

Summary

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

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

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

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

NEW

Performance Benchmarks

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

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

Rental Assistance for Homelessness Prevention

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

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

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

NEW

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

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

Housing Relocation and Stabilization Services

Financial Assistance

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

Security Deposits

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

Last Month's Rent

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

Utilities

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

Utility Deposits

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

- Gas
- Electric
- Water
- Sewage

Utility Payments

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

Rental Application Fees

ESG funds may pay for the rental housing application fee if it is a standardized fee charged to all applicants, not just those in an ESG program.

Moving Costs

ESG funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance under housing stabilizations services and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.

Stabilization Services

ESG funds may be used to provide specific supportive services to eligible households. These services may be provided with or without the provision of financial or rental assistance, for a maximum of 24 months.

ESG funds may be used to provide the following categories of stabilization services:

Housing Search and Placement

For participants who need assistance finding or securing housing, ESG funds may support the services or activities necessary to assist them in locating, obtaining, and retaining suitable permanent housing. These activities include:

- Assessment of housing barriers, needs, and preferences
- Development of an action plan for locating housing
- Housing search
- Outreach to and negotiation with owners
- Assistance with submitting rental applications and understanding leases
- Assessment of housing for compliance with ESG requirements for habitability, lead-based paint, and rent reasonableness/FMR as described above
- Assistance with obtaining utilities and making moving arrangements
- Tenant counseling

Housing Stability Case Management

ESG funds may be used to pay costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing. Funds may also be used to assist a program participant in overcoming immediate barriers to obtaining housing.

Case management assistance cannot exceed 30 days during the period that the program participant is seeking permanent housing.

Whether paid for with ESG funds or not, housing stability case management should be provided as needed to support households to regain housing stability and link them to other services in the community. The program must, at minimum, develop a plan to assist the program participant to retain permanent housing after the ESG assistance ends. The plan should take into account all relevant considerations, including: the program participant's current or expected income and expenses; other public or private assistance for which the program participant will be eligible and likely to receive; and the relative affordability of available housing in the area.

Case management services are intended to be flexible and respond to the participant's needs, while leveraging other services in the community as much as possible. During their enrollment in the program, participants must meet with a case manager not less than once per month to work towards long-term housing stability.

Mediation

ESG funds may pay for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the participant from losing permanent housing in which they currently reside.

Legal Services

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

Eligible Subject Matters: These include child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; and the resolution of outstanding criminal warrants. **Eligible Costs:** Eligible costs are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of the State in which the services are provided, and by person(s) under the supervision of the licensed attorney, regarding matters that interfere with the program participant's ability to obtain and retain housing. Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible

costs are the program's employees' salaries and other costs necessary to perform the services.

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

Credit Repair

ESG funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.

Homeless Prevention Client Files

General Program Documentation

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

All Client Files

- An assessment by either project staff or Coordinated Assessment Model staff
- Signed HMIS Release(s) (for all adult members of the household)
- Verifications of At Risk of Homelessness that align to the project with which they are involved (third party certification or self-declaration, plus backup documentation)
- Initial Consultation Form
- Case Notes (minimum of monthly case notes)
- Individualized Housing and Service Plan
- Income Verification including backup documentation (paystubs, third-party verifications, etc.)
- As applicable, determinations of ineligibility (e.g., if client requests ESG services and is deemed ineligible or declines services, written explanation of why the client was ineligible or declined services, along with any rights of appeal they may have).

Homelessness Prevention Specific Forms

- Lead compliance documentation
- Current unit Inspection Report (Habitability)
- Signed lease containing client's name(s)
- Rent agreement (with landlord)
- Rent reasonableness/FMR documentation
- Documentation of services and assistance provided to the client, including, as applicable, the security deposit, rental assistance, and utility payments made on behalf of the client

- Copies of financial assistance payments (including type of assistance, payee name, client name, check number, and amount paid using ESG funds)
- Staff certification of eligibility

Housing Inspection Requirements

Subrecipients cannot use ESG funds to help a program participant remain in or move into housing that does not meet certain standards. Depending on the situation, the City of Detroit has determined that subrecipients must use either the Housing Quality Standards (HQS) form or the Habitability Standards form.

Both HQS and habitability inspections must be conducted by a qualified ESG recipient or subrecipient staff or contractor. Program participants may not conduct inspections.

In addition:

- If an eligible household needs homelessness prevention assistance to remain in its existing unit, the assistance can only be provided if that unit meets habitability standards.
- If an eligible household needs homelessness prevention assistance to move to a new unit, the assistance can only be provided if the new unit meets the housing quality standards (HQS).
- Minimum standards must be met even if one-time assistance is provided (e.g., rental arrears, security deposit, etc.).
- The subrecipient must be sure to document compliance with the ESG habitability standards or housing quality standards (whichever is applicable) in the program participant's file.

ESG habitability standards cover 10 areas of review to ensure that the housing is minimally habitable. These 10 areas are:

- **Structure and materials** - The structures must be structurally sound to protect residents from the elements and not pose any threat to the health and safety of the residents.
- **Space and security** - Each resident must be provided adequate space and security for themselves and their belongings, and an acceptable place to sleep.
- **Interior air quality** - Each room or space must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.
- **Water supply** - The water supply must be free from contamination.
- **Sanitary facilities** - Residents must have access to sufficient sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.
- **Thermal environment** - The housing must have any necessary heating/cooling facilities in proper operating condition.

- **Illumination and electricity** - The structure must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the structure.
- **Food preparation** - All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.
- **Sanitary conditions** - The housing must be maintained in a sanitary condition.
- **Fire safety** - There must be a second means of exiting the building in the event of fire or other emergency. Each unit must include at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit. Smoke detectors must be located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is occupied by hearing impaired persons, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person. The public areas of all housing must be equipped with a sufficient number, but not less than one for each area, of battery-operated or hard-wired smoke detectors. Public areas include, but are not limited to, laundry rooms, community rooms, day care centers, hallways, stairwells, and other common areas.

A checklist tool for ensuring that permanent housing standards are met can be found here: <https://www.hudexchange.info/resources/documents/ESG-Emergency-Shelter-and-Permanent-Housing-Standards-Checklists.docx>

HQS standards can be found in Appendix F.

Lead-Based Requirements

If a building or unit was built before 1978, there is a possibility it has lead-based paint. In 1978 the federal government banned consumer uses of lead-containing paint, but some states banned it even earlier. Lead from paint, including lead-contaminated dust, is one of the most common causes of lead poisoning.

Organizations that receive funds for Homelessness Prevention **MUST** comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and they must implement regulations in [24 CFR part 35](#), subparts A, B, H, J, K, M, and R.

ESG regulations state that a lead-based paint visual assessment must be completed for all units that meet the three following conditions:

- The household living in the unit is being assisted with ESG financial assistance (rent assistance, utilities assistance, utility/security deposits, or arrears).
- The unit was constructed prior to 1978.
- A child under the age of six or a woman who could become pregnant is or may be living in the unit.

These regulations apply regardless of whether a household is staying in an existing unit or moving to a new unit and they must be complied with prior to providing ESG assistance. They must also be complied with (and assessments completed) annually thereafter.

ESG subrecipients are responsible for ensuring that property owners and managers meet the lead-based paint requirements. It may be helpful for subrecipients to think about the requirements in two categories, outlined below.

1. **Disclosure Requirements** - Disclosure requirements are triggered for ALL properties constructed prior to 1978. These requirements require that lessors (property owners or managers) provide tenants with:
 - [Disclosure form for rental properties disclosing the presence of known and unknown lead-based paint](#)
- AND**
- A copy of the [“Protect Your Family from Lead in the Home” pamphlet](#)

This requirement actually relates to property owners/managers but sharing this information with program participants (or ensuring they have received it) is an easy thing to do and is recommended for ESG subrecipients.

2. **The Visual Assessment** - Staff may become a HUD-Certified Visual Assessor by successfully completing a [20-minute online training](#) through HUD’s website. Depending on the results of the visual assessment, additional steps may be required before assistance can be provided for that unit. The unit needs to be brought into compliance. There are certain exceptions to the rule. Visual assessments are not triggered under the following circumstances:
 - It is a zero-bedroom or SRO-sized unit.
 - X-ray or laboratory testing of all painted surfaces by certified personnel has been conducted in accordance with HUD regulations and the unit is officially certified to not contain lead-based paint.
 - The property has had all lead-based paint identified and removed in accordance with HUD regulations.
 - The client is receiving federal assistance from another program, where the unit has already undergone a visual assessment within the past 12 months (e.g., if the client has a Section 8 voucher and is receiving ESG assistance for a security deposit or arrears). NOTE: In such cases, ESG staff are required to obtain documentation that a visual assessment has been conducted by the agency administering the other assistance. This documentation should be added to the ESG case file.
 - It meets any of the other exemptions described in [24 CFR Part 35.115\(a\)](#).

If any of the conditions outlined above are met, a staff member simply needs to document the condition and place a copy in the participant’s case file.

If a visual assessment reveals problems with paint surfaces, program staff cannot approve the unit for assistance until the deteriorating paint has been repaired. At this point, program staff must make a decision: 1) work with the property owner/manager to complete needed paint stabilization activities and clearance, 2) work with the household to locate a different (lead-safe) unit, or 3) refer the client to a different program if ESG assistance cannot be provided.

Fair Market Rent and Rent Reasonableness Requirements

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

Rent reasonableness and FMR requirements do not apply when a program participant receives only financial assistance or services under Housing Stabilization and Relocation Services. This includes rental application fees, security deposits, an initial payment of last month's rent, utility payments/deposits, moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, legal services, and credit repair.

Note that this guidance only applies to ESG homeless prevention and Rapid Re-Housing. For guidance on CoC rules regarding FMR and rent reasonableness, please consult the following [HUD Exchange resource](#).

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

Rent Reasonableness

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

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

Fair Market Rent (FMR)

FMRs are gross rent estimates. The U.S. Department of Housing and Urban Development (HUD) annually estimates FMRs for 530 metropolitan areas and 2,045 nonmetropolitan county areas.

HUD sets FMRs to assure that a sufficient supply of rental housing is available to program participants. By law, HUD is required to publish new FMRs at the start of each federal fiscal year on October 1.

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

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

Documentation of Income (Homelessness Prevention)

Documentation of income is required for Homelessness Prevention programs at intake and at each recertification (i.e., every 3 months).

For FY2017, the income limits for ESG (i.e., the 30% Income Limit) can be found on the [HUD Exchange](#) website. Do not use HUD’s Extremely Low-Income Limit; this is different than the 30% Income Limit used for ESG. These income limits are updated annually (typically in the spring of each year) and take effect as soon as they are announced by HUD.

For clients receiving Homelessness Prevention services, subrecipients must calculate the annual income of the individual or family (as described in [24 CFR 5.609](#)). These regulations are summarized in the following charts.

When calculating income, subrecipients should note the following:

- All adults (persons 18 and over) must have documentation of income (even if there is no income).
- One or more of the below documents must be kept in the client/household file.
- If there is more than one adult in a household, documentation must be provided for each adult household member.
- If an adult has more than one income source or job, each source of income should have its own documentation (e.g., paystubs for employment and TANF benefit letter).

Documentation Options by Income Types				
Income Source	Include in Income Calculation?	Third Party	Oral Verification	Self-Declaration
No Income Reported	Yes	Copy of Social Security Statement obtained through http://www.socialsecurity.gov/mystatement/ AND Signed Declaration of No Income	N/A	Client completes Self Declaration of No Income

Wages and Salary	Yes GROSS Pay (Not Net Pay)	Copy of Recent Paystubs OR Signed Letter from Employer (including gross pay amount, frequency, average hours, and contact information)	Staff contacts employer and completes Oral Verification of Income	Client completes Self Declaration of No Income
Self-Employment/ Business Income	Yes NET Income (Not Gross Pay)	Copy of most recent federal or state tax return showing net business income	N/A	Client completes Self Declaration of No Income
Interest and Dividend Income	Yes GROSS Pay (Not Net Pay)	Copy of most recent interest or dividend income statement OR Copy of most recent federal or state tax return showing interest, dividend, or other net income	N/A	Client completes Self Declaration of No Income
Pension/ Retirement Income	Yes GROSS Pay (Not Net Pay)	Copy of most recent payment statement or benefit notice from Social Security Administration (SSA), pension provider, or another source	Staff contacts provider and completes Oral Verification of Income	Client completes Self Declaration of No Income
Unemployment Income	Yes GROSS Pay (Not Net Pay)	Copy of most recent unemployment or severance payment statement notice	Staff contacts provider and completes Oral Verification of Income	Client completes Self Declaration of No Income
Disability Income	Yes GROSS Pay (Not Net Pay)	Copy of most recent worker's compensation, SSI, or SSDI payment	Staff contacts provider and completes Oral Verification of Income	Client completes Self Declaration of No Income
Temporary Assistance for Needy Families (TANF) or other Cash Public Assistance	Yes GROSS Pay (Not Net Pay)	Copy of most recent payment statement or benefit notice	Staff Contacts Provider and completes Oral Verification of Income	Client completes Self Declaration of No Income

Alimony, Child Support, Foster Payment	Yes GROSS Pay (Not Net Pay)	Copy of most recent alimony, foster care, child support or other contributions or gift payment statements, notices, or orders	Staff contacts provider, family member, or court, and completes Oral Verification of Income	Client completes Self Declaration of No Income
Armed Forces Income	Yes GROSS Pay (Not Net Pay)	Copy of payment statement or other government issued statement indicating income amount	Staff contacts provider and completes Oral Verification of Income	Client completes Self Declaration of No Income

The following table describes the types of income that are not counted when calculating gross income for purposes of determining ESG eligibility and documentation.

Income Exclusions by Income Types	
General Category	Description
1. Income of Children	Income from employment of children (including foster children) under the age of 18 years.
2. Inheritance and Insurance Income	Lump-sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains and settlement for personal or property losses (except as provided in Pension/Retirement Income).
3. Medical Expense Reimbursements	Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member.
4. Income of Live-in Aides	Income of a live-in aide (as defined in 24 CFR 5.403).
5. Disabled Persons (only in HOME Properties)	Certain increases in income of a disabled member of qualified families residing in HOME-assisted housing or receiving HOME tenant-based rental assistance (24 CFR 5.617).
6. Student Financial Aid	The full amount of student financial assistance paid directly to the student or to the educational institution.
7. Armed Forces Hostile Fire Pay	The special pay to a family member serving in the Armed Forces who is exposed to hostile fire.

8. Self-Sufficiency Program Income	<p>a. Amounts received under training programs funded by HUD.</p> <p>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).</p> <p>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> <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 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.

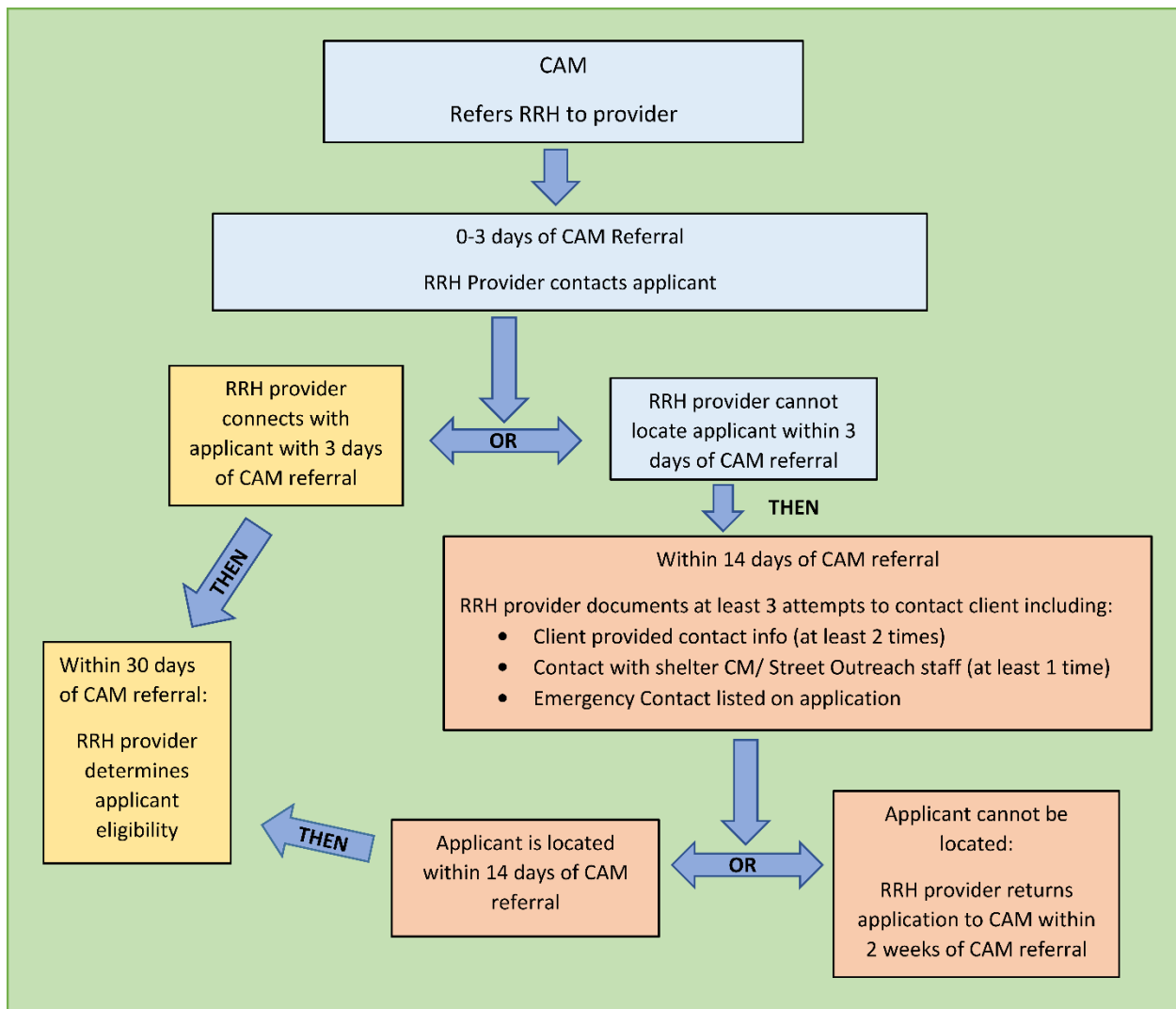
Housing Choice Voucher (HCV) - Security Deposit Only

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.

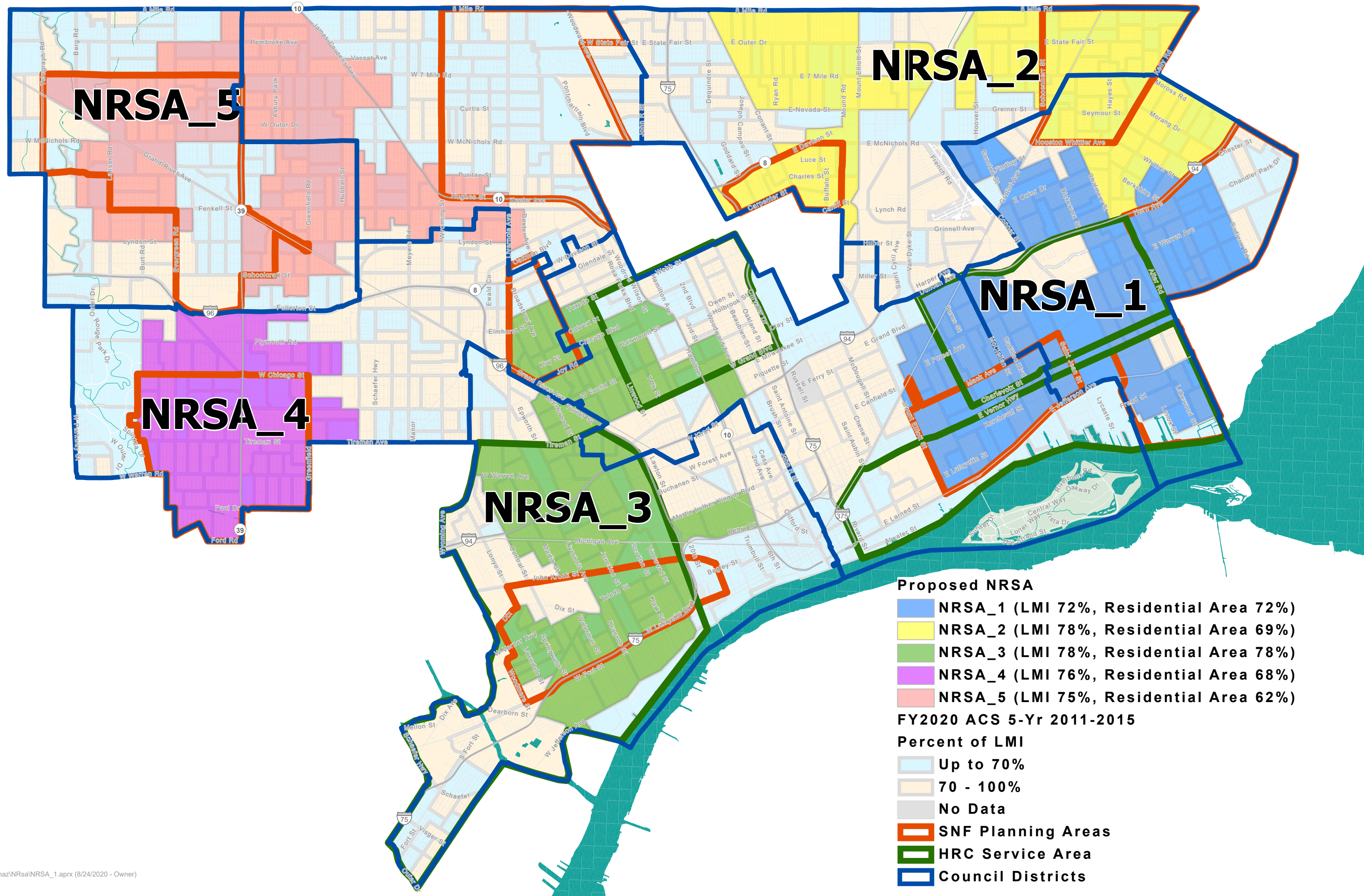
This will include one or more of the following:

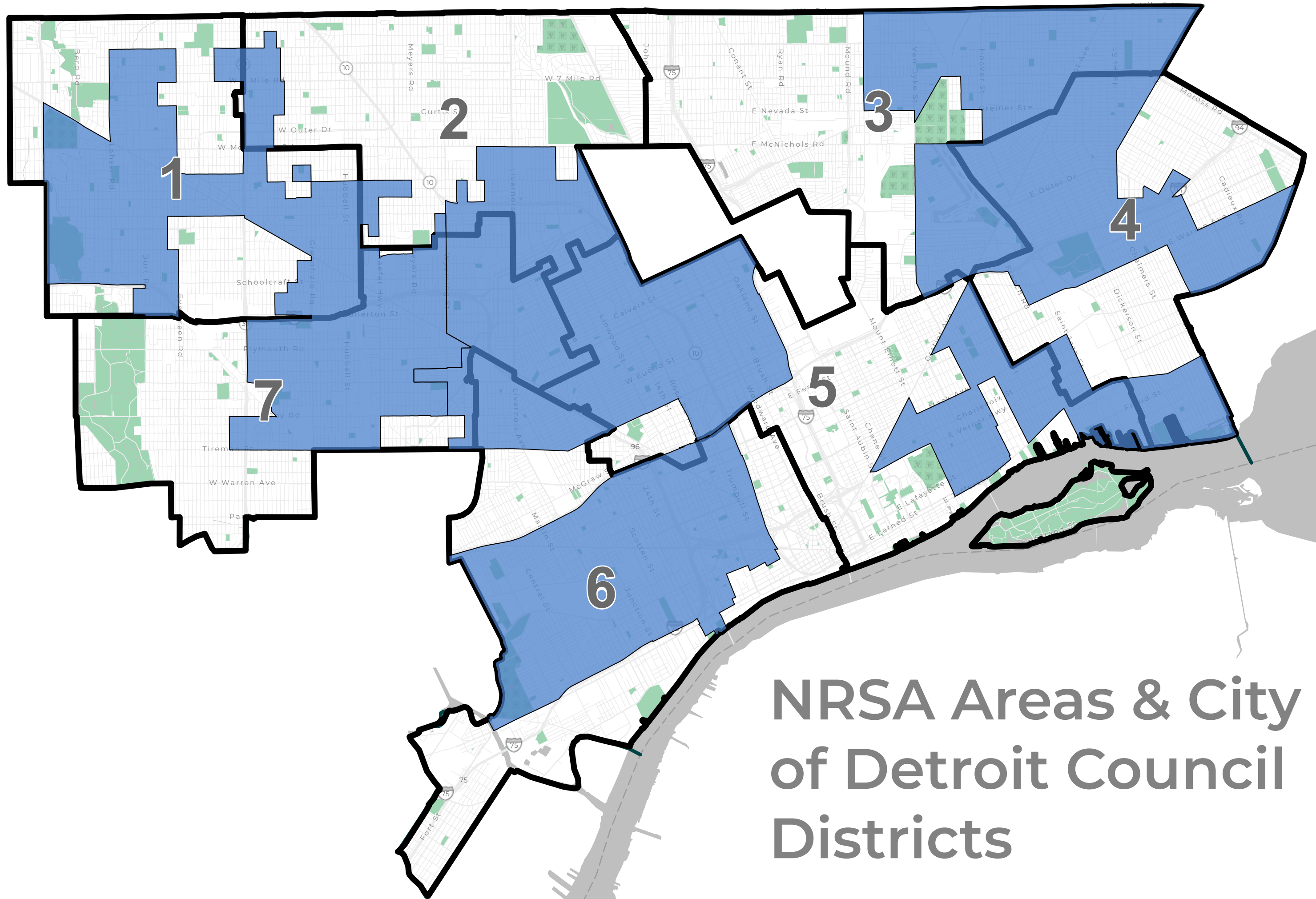
- That there were areas of concern (deficiencies in performance that are not based on a regulatory or statutory requirement, but nevertheless should be brought to the attention of the agency)
- That there were findings (deficiencies that are not in compliance with regulatory or statutory requirements)
- 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.

MAPS:



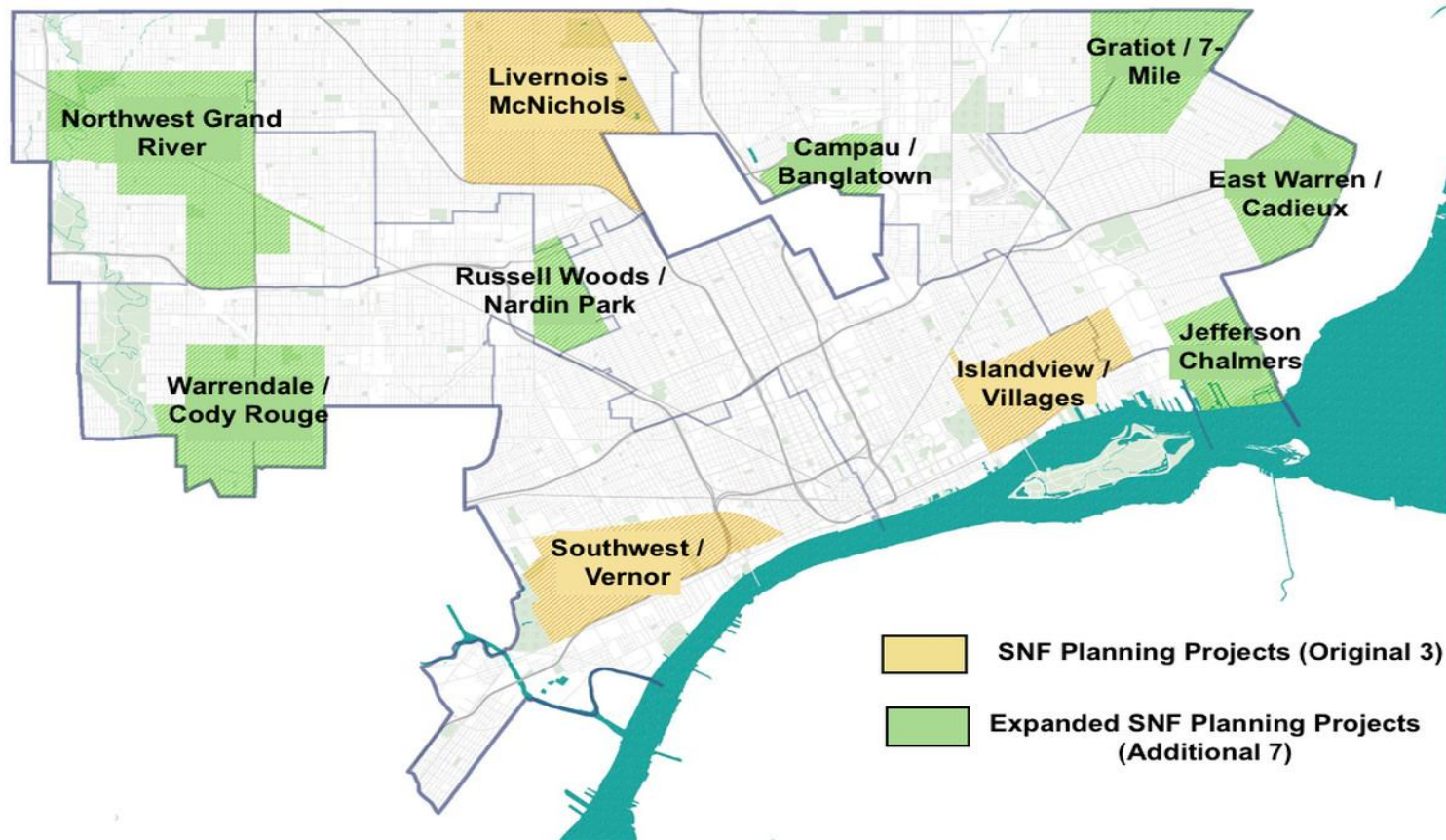


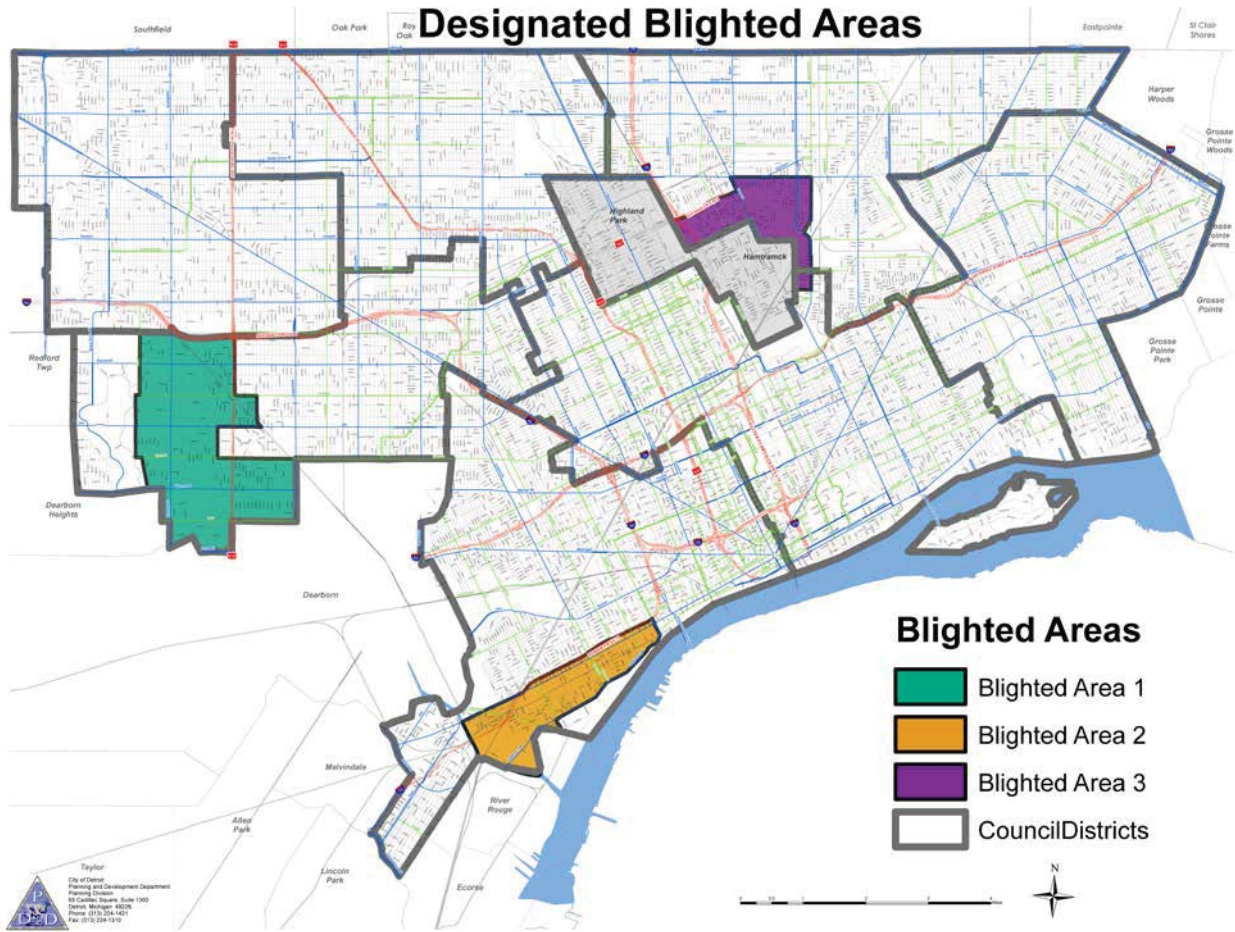
NRSA Areas & City of Detroit Council Districts



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

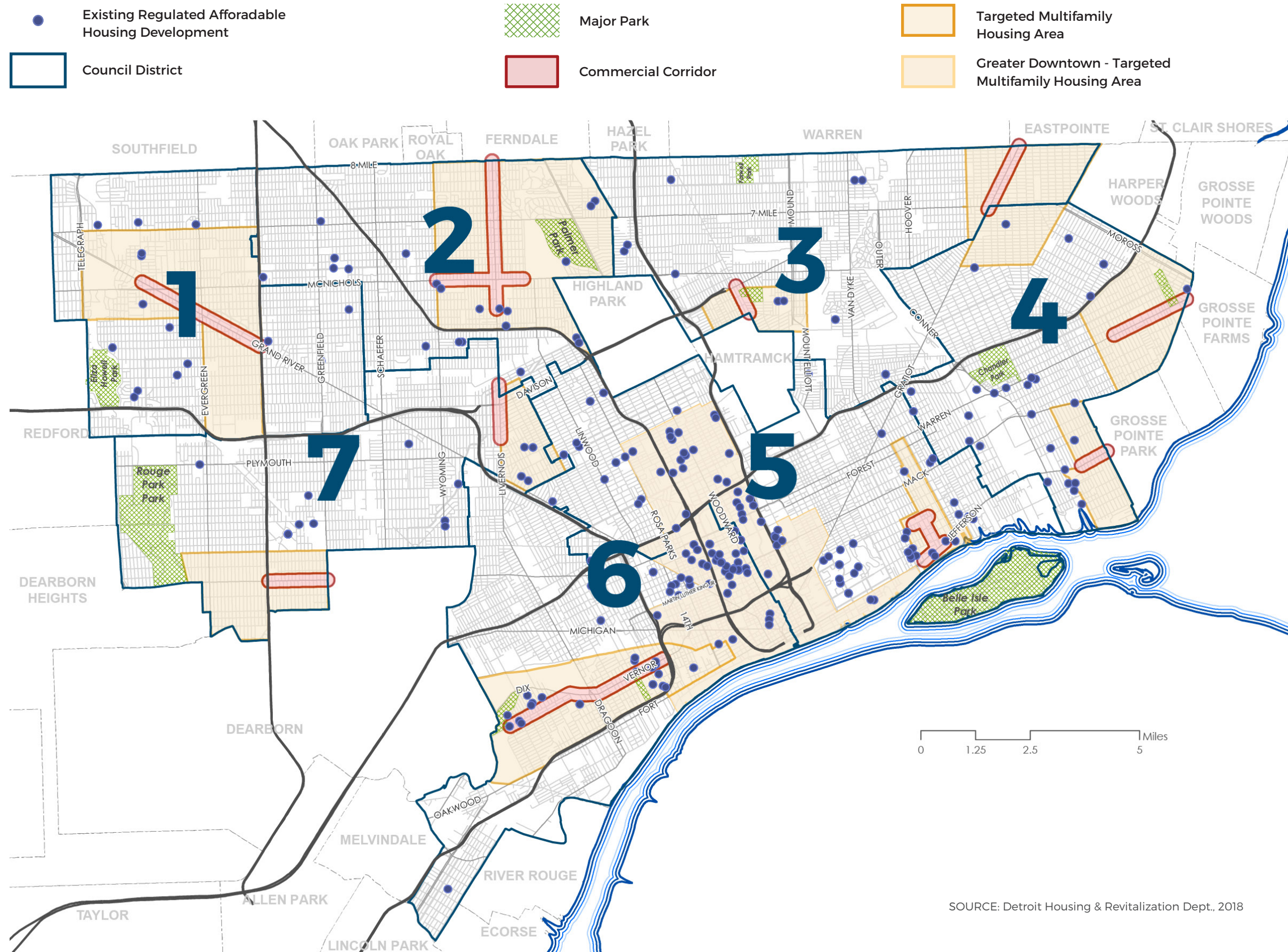
In mid-2017, the City convened and led a task force comprised of community stakeholders to develop a Preservation Action Plan that will guide preservation efforts over the next five years. The creation of this group, known as the Detroit Affordable Housing Preservation Task Force, was modeled on best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

