



Macomb
Community
Action

MACOMB COUNTY & THE MACOMB HOME CONSORTIUM

2021 ANNUAL ACTION PLAN

Executive Summary

MACOMB COUNTY EXECUTIVE

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MACOMB COMMUNITY ACTION

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Executive Summary

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

1. Introduction

Macomb County (County) is an Urban County which is comprised of 20 local units of government including the Villages of Armada, New Haven, and Romeo; the Townships of Armada, Bruce, Chesterfield, Harrison, Lenox, Macomb, Ray, Richmond, Shelby and Washington; and the Cities of Center Line, Eastpointe, Fraser, Mount Clemens, New Baltimore, Richmond and Utica. Inaugurated in 1982 in the Community Development Block Grant (CDBG) program, the County became a HOME participating jurisdiction (PJ) in 1992, and formed the Macomb HOME Consortium (MHC) in 2006, together with Roseville, Sterling Heights, and Clinton Township. During the 2013 program year, the County received its first allocation of funds through the Emergency Solutions Grant (ESG).

The 2021 Annual Action Plan (AAP) implements the County's 2019 - 2023 Consolidated Plan (Con Plan), effective from July 1, 2019 through June 30, 2023, and details the CDBG and ESG programs for the County, and the HOME program for the MHC. The 2021 AAP represents the third of the five program years covered under the Con Plan.

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

2. Summarize the objectives and outcomes identified in the Plan

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

The demand for programs funded by CDBG, HOME and ESG remain greater than the available funds. As such, it is the intent of the County to address each of the goals identified in the Con Plan at least once

during the life of the Plan. The following is a list of the 2019 - 2023 goals that will be addressed in the 2021 AAP.

Make Available Appropriate Housing

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

2021 Activities: 1) Minor Home Repair (CDBG); 2) Housing Rehabilitation (CDBG & HOME); 3) CHDO set-aside for development of new affordable housing – homebuyer or rental (HOME); and 4) Tenant Based Rental Assistance (HOME)

Improve Public Facilities and Infrastructure

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

2021 Activities: 1) Center Line – Playground Replacement; 2) Chesterfield Twp. – Senior Citizen Playground – Phase 2; 3) Eastpointe – Almond Street Reconstruction; 4) Harrison Township – Union Lake Sidewalks; 5) Macomb Township – ADA Sidewalk Ramp Installation; 6) City of Richmond – Senior Center Door Replacement; and 7) Shelby Township – 24 Mile Road Sidewalk Installation Project

Address the Needs of Homeless & At-Risk Families

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

2021 Activities: 1) Homeless Shelters: MCREST, and Turning Point (CDBG); 2) Rapid Rehousing (ESG); and 3) Shelter Operations (ESG)

Provide and Expand Human Services

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

2021 Activities: 1) Senior Activity Programs: Chesterfield Twp., Macomb Twp., Ray Twp., Richmond and Shelby Twp.; 2) Large Print Books: Utica; 3) Dial-A-Ride: Harrison Twp. ; 4) Armada PAL will provide summer activities for children of LMI families ; 5) Care House will assist abused children; 6) Samaritan House and the Shelby Lions Club will provide food assistance to LMI families; 7) Wigs for Kids will provide

wigs and supportive services to LMI families; 8) Interfaith Volunteer Caregivers will assist seniors with indoor and outdoor chores; and 9) Macomb Community Action will provide seniors with grass cutting and snow removal services. All of these activities will be funded through CDBG.

Expand Planning, Grant Management and Capacity

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

1) ESG funds equal to 7.5% for grant administration; 2) HOME funds equal to 10% for grant administration; and 3) CDBG funds equal to 20% of the grant have been dedicated to administration (includes County, Macomb Homeless Coalition, and the Fair Housing Center of Metropolitan Detroit).

3. Evaluation of past performance

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

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

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

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

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

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

During the review of the County's 2019-2023 Consolidated Plan, the U.S. Department of Housing and Urban Development - Office of Fair Housing and Equal Opportunity noted that the County's Consolidated Plan did not focus enough funds to areas of low-income and minority concentration. Based on this feedback, the County agreed to allocate CDBG bricks and mortar funds on a competitive basis. The scoring criteria for the competition would award higher points to projects that served areas of minority concentration. For the 2021 program year, seven (7) of the Urban County's twenty (20) communities submitted projects through the competition. The current available funding allowed the County to fund all seven projects (no applications were rejected). Two of the projects are located in the County's lowest-income and highest minority concentration areas (Center Line and Eastpointe). Of the \$849,330 made available through the competition, \$300,000 or 35% was awarded to these projects.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Per the County's Citizen Participation Plan (CPP), the Annual Action Plan must be developed in consultation with citizens and stakeholders, and at least one public hearing will occur. Due to the social distancing restrictions in place because of COVID-19, most public hearings took place in a virtual format as allowed under Macomb County's current CPP. MHC members are responsible for developing their CDBG Annual Action Plans. CDBG funds are allocated to each community, which develops its own program in conformance with law and regulation, and in conformance with the Consolidated Plan. Macomb County and the MHC member communities must develop uses for HOME funding as well.

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

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

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

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

5. Summary of public comments

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

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

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

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

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	MACOMB COUNTY	Macomb Community Action - Community Development
HOME Administrator	MACOMB COUNTY	Macomb Community Action - Community Development
ESG Administrator	MACOMB COUNTY	Macomb Community Action - Community Development

Table 1 – Responsible Agencies

Narrative

Macomb County (County) is an Urban County which is comprised of 20 local units of government including the Villages of Armada, New Haven, and Romeo; the Townships of Armada, Bruce, Chesterfield, Harrison, Lenox, Macomb, Ray, Richmond, Shelby and Washington; and the Cities of Center Line, Eastpointe, Fraser, Mount Clemens, New Baltimore, Richmond and Utica. Inaugurated in 1982 in the Community Development Block Grant (CDBG) program, the County became a HOME participating jurisdiction (PJ) in 1992, and formed the Macomb HOME Consortium (MHC) in 2006, together with Roseville, Sterling Heights, and Clinton Township. During the 2013 program year, the County received its first allocation of funds through the Emergency Solutions Grant (ESG). The Office of the County Executive designated Macomb Community Action, Office of Community Development as the entity responsible for administering its CDBG, HOME, and ESG programs including development of the Con Plan, AAP, and CAPER.

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

Consolidated Plan Public Contact Information

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

1. Introduction

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

For the 2021 Annual Action Plan, Macomb County consulted with other government, non-profit, low-income persons, and private agencies to develop the PY 2021 AAP. However, consultation was affected by the COVID-19 pandemic resulting in most consultation efforts being held virtually, via email, and internet posting.

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

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

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

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

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

For the 2021 Annual Action Plan two workshops were held, one for public service providers and another for community partners. Due to the COVID-19 pandemic public hearings were held virtually. To encourage participation, since most employees were working from home, email notifications were sent to partners, including housing provider's health, and services agencies in addition to the required newspaper notification.

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

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

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

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

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

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

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

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

Table 2 – Agencies, groups, organizations who participated

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

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

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

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

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

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

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

24	Agency/Group/Organization	Washington Township
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Local Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Formal and informal consultation occurred with this community during Plan development. This included community and non-profit workshops, public hearings, and informal, ad-hoc discussions. Valuable insights were obtained and incorporated into this Plan.
25	Agency/Group/Organization	Macomb Community Action
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-homeless
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The needs identified in Macomb Community Action's Community Needs Assessment were considered when developing this plan to ensure that services were necessary and not duplicated.
26	Agency/Group/Organization	Turning Point, Inc
	Agency/Group/Organization Type	Services-Victims of Domestic Violence Services - Victims
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in the non-profit workshop during which public service needs were discussed. The needs of public service providers were relayed to participating units of general local government. The local government took into consideration those comments when allocating funding.
27	Agency/Group/Organization	Macomb County Interfaith Volunteer Caregivers
	Agency/Group/Organization Type	Services-Elderly Persons Services-Persons with Disabilities

	What section of the Plan was addressed by Consultation?	Public Services
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in the non-profit workshop during which public service needs were discussed. The needs of public service providers were relayed to participating units of general local government. The local government took into consideration those comments when allocating funding.
28	Agency/Group/Organization	MCREST
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in the non-profit workshop during which public service needs were discussed. The needs of public service providers were relayed to participating units of general local government. The local government took into consideration those comments when allocating funding.
29	Agency/Group/Organization	Samaritan House
	Agency/Group/Organization Type	Services-Food Assistance
	What section of the Plan was addressed by Consultation?	Public Services
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in the non-profit workshop during which public service needs were discussed. The needs of public service providers were relayed to participating units of general local government. The local government took into consideration those comments when allocating funding.
30	Agency/Group/Organization	CARE House/Child Advocacy Center
	Agency/Group/Organization Type	Services-Children Services - Victims
	What section of the Plan was addressed by Consultation?	Public Services

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in the non-profit workshop during which public service needs were discussed. The needs of public service providers were relayed to participating units of general local government. The local government took into consideration those comments when allocating funding.
31	Agency/Group/Organization	Shelby Lions Club
	Agency/Group/Organization Type	Services-Food Assistance
	What section of the Plan was addressed by Consultation?	Public Service Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in the non-profit workshop during which public service needs were discussed. The needs of public service providers were relayed to participating units of general local government. The local government took into consideration those comments when allocating funding.
32	Agency/Group/Organization	Macomb County Habitat for Humanity
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Macomb County Habitat for Humanity conducts a home buyer program for low-income buyers. Formal and informal consultation occurred with this agency during Plan development. Valuable insights were obtained and incorporated into this Plan.
33	Agency/Group/Organization	Community Housing Network, Inc
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy

<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Community Housing Network provides a variety of housing programs to Macomb County residents, including home buyer, rental, and homeless assistance programs. Formal and informal consultation occurred with this agency during Plan development. Valuable insights were obtained and incorporated into this Plan.</p>
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Identify any Agency Types not consulted and provide rationale for not consulting

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

Macomb County reached out to many more agencies and organizations, including Public Housing Agencies, but only organizations that actively participated in the development of Macomb County's 2021 Annual Action Plan or submitted comments were included in the preceding table.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Macomb Homeless Coalition	The goals and strategies of the CoC's plan to end homelessness overlap and align with the goals and priority needs of the Consolidated Plan.
Macomb Community Action Community Needs Assessment	Macomb Community Action	The Goals identified in the plan overlap and align with the goals and priority needs of the Consolidated Plan.

Table 3 – Other local / regional / federal planning efforts

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

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

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

Each of the local communities that apply for or allocate CDBG funds were required to conduct a public hearing to solicit citizen views on activities, and to provide eligibility, funding and other information essential to inform participation.

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

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

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Newspaper Ad	Non-targeted/broad community	Notice of the Village of Armada's public hearing was published in the Record Newspaper on December 23, 2020.	No comments were received.	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Hearing	Non-targeted/broad community	January 11, 2021 Village of Armada public hearing. The meeting was held by the governing body and was open to the public.	Due to the pandemic no representatives from the non-profits were in attendance but Armada PAL, Samaritan House, and Care House all submitted their requests and information about their organizations in writing and this information was given to council.	The organizations that requested funds at the public hearing were allocated funding.	
3	Newspaper Ad	Non-targeted/broad community	Notice of the Township of Armada's public hearing was published on January 27, 2021.	No comments were received.	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Hearing	Non-targeted/broad community	February 10, 2021 Township of Armada public hearing. The meeting was held by the governing body via GoToMeeting and open to the public.	Representatives from Interfaith Volunteer Caregivers, Care House, and Armada PAL explained the benefits of their respective programs.	The organizations that presented at the public hearing were allocated funding.	
5	Newspaper Ad	Non-targeted/broad community	Notice of Bruce Township's public hearing was published in the Record Newspaper on December 30, 2020.	No comments were received.	N/A	
6	Public Hearing	Non-targeted/broad community	January 20, 2021 Bruce Township's public hearing. The meeting was held by the governing body and was open to the public.	Representatives from Care House and Samaritan House spoke about the benefits of their respective programs.	The organizations that presented at the public hearing were allocated funding.	
7	Newspaper Ad	Non-targeted/broad community	Notice of Center Line's public hearing was published in the Warren Weekly on December 16, 2020.	No comments were received.	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
8	Public Hearing	Non-targeted/broad community	January 5, 2021 Center Line public hearing. The meeting was held by the governing body and open to the public.	There were no public comments recorded on the meeting minutes submitted.	N/A	
9	Newspaper Ad	Non-targeted/broad community	Notice of Chesterfield Township's public hearing was published in the Macomb Daily on January 8, 2021.	No comments were received.	N/A	
10	Public Hearing	Non-targeted/broad community	February 23, 2021 Chesterfield Township public hearing. The meeting was held by the governing body and was open to the public.	Facilities director addressed the board.	The organizations that presented at the public hearing were allocated funding.	
11	Newspaper Ad	Non-targeted/broad community	Notice of Eastpointe's public hearing was published in the Macomb Daily on January 9, 2021.	No comments were received.	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
12	Public Hearing	Non-targeted/broad community	February 16, 2021 Eastpointe public hearing. The meeting was held by the governing body and was open to the public.	There were no public comments recorded on the meeting minutes submitted.	N/A	
13	Newspaper Ad	Non-targeted/broad community	Notice of the city of Fraser's public hearing was published in the Macomb Daily on December 24, 2020.	No comments were received.	N/A	
14	Public Hearing	Non-targeted/broad community	January 14, 2020 city of Fraser public hearing. The meeting was held by the governing body (virtually) and was open to the public.	Representatives from Care House, Turning Point, and Interfaith Volunteer Caregivers spoke about the benefits of their respective programs.	The organizations that presented at the public hearing were allocated funding.	
15	Newspaper Ad	Non-targeted/broad community	Notice of Harrison Township's public hearing was published in the Macomb Daily on January 5, 2021.	No comments were received.	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
16	Public Hearing	Non-targeted/broad community	January 25, 2021 Harrison Township public hearing. The meeting was held by the governing body and was open to the public.	Representatives from Turning Point, Care House, and Interfaith Volunteer Caregivers spoke about the benefits of their respective programs.	The organizations that presented were not given funding. All funding was given to Harrison Township's Dial-A-Ride public service project.	
17	Newspaper Ad	Non-targeted/broad community	Notice of Lenox Township's public hearing was published on January 17, 2021.	No comments were received	N/A	
18	Public Hearing	Non-targeted/broad community	February 1, 2021 Lenox Township public hearing. The meeting was held virtually in accordance with COVID-19 guidelines and open to the public.	No comments were received.	N/A	
19	Newspaper Ad	Non-targeted/broad community	Notice of Macomb Township's public hearing was published in the Macomb Daily on February 2, 2021.	No comments were received.	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
20	Public Hearing	Non-targeted/broad community	February 24, 2021 Macomb Township public hearing. The meeting was held by the governing body and was open to the public.	No comments were received, although one trustee commended Care House for the work they do on behalf of children.	N/A	
21	Newspaper Ad	Non-targeted/broad community	Notice of the city of Mt. Clemens' public hearing was published in the Mount Clemens-Clinton-Harrison Journal on January 13, 2021.	No comments were received.	N/A	
22	Public Hearing	Non-targeted/broad community	February 1, 2021 city of Mt. Clemens public hearing. The meeting was held by teleconference due to the COVID-19 State of Emergency and pursuant to the Michigan Open Meetings Act.	Representatives from Turning Point, Interfaith Volunteer Caregivers, and Care House spoke about the benefits of their respective programs.	The organizations that presented at the public hearing were allocated funding.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
23	Newspaper Ad	Non-targeted/broad community	Notice of the Village of New Haven's public hearing was published in the Voice Newspaper on December 23, 2020.	No comments were received.	N/A	
24	Public Hearing	Non-targeted/broad community	January 12, 2021 Village of New Haven public hearing. The meeting was held by the governing body and was open to the public.	There were no public comments recorded on meeting minutes.	N/A	
25	Newspaper Ad	Non-targeted/broad community	Notice of Ray Township's public hearing was published in the Record Newspaper on January 8, 2021.	No comments were received.	N/A	
26	Public Hearing	Non-targeted/broad community	January 19, 2021 Ray Township public hearing. The meeting was held by the governing body via Zoom and was open to the public.	Representatives from Samaritan House and Care House spoke about the benefits of their respective programs.	The organizations that presented at the public hearing were allocated funding.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
27	Newspaper Ad	Non-targeted/broad community	Notice of Richmond Township's public hearing was scheduled to be published January 20, 2021.	No comments were received.	N/A	
28	Public Hearing	Non-targeted/broad community	February 10, 2021 Richmond Township public hearing. The meeting was held by the governing body and was open to the public.	Representative from Care House spoke about the benefits of their program.	The organizations that presented at the public hearing were allocated funding.	
29	Newspaper Ad	Non-targeted/broad community	Notice of the city of Richmond's public hearing was published in the North Macomb Voice on January 13, 2021.	No comments were received.	N/A	
30	Public Hearing	Non-targeted/broad community	February 1, 2021 city of Richmond public hearing. The meeting was held by the governing body and was open to the public.	There were no public comments recorded on meeting minutes.	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
31	Newspaper Ad	Non-targeted/broad community	Notice of Romeo's public hearing was published in the Macomb Daily on February 1, 2021.	No comments were received.	N/A	
32	Public Hearing	Non-targeted/broad community	February 16, 2021 Romeo public hearing. The meeting was held by the governing body via Zoom and open to the public.	CDBG Fund Requestors were on meeting minutes; no details	The organizations that presented at the public hearing were allocated funding.	
33	Newspaper Ad	Non-targeted/broad community	Notice of Shelby Township's public hearing was published in the Shelby-Utica News on December 23, 2020.	No comments were received.	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
34	Public Hearing	Non-targeted/broad community	January 19, 2021 Shelby Township public hearing. The meeting was held by the governing body remotely and open to the public.	Representatives from Samaritan House, Turning Point, Wigs 4 Kids, Interfaith Volunteer Caregivers, and Care House spoke about the benefits of their respective programs. Planning Director discussed brick & mortar projects in 2019 that have been completed and 2020 that is still in environmental stage.	The organizations that presented at the public hearing were allocated funding.	
35	Newspaper Ad	Non-targeted/broad community	Notice of Utica's public hearing was published in the Shelby-Utica News on January 13, 2021.	No comments were received.	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
36	Public Hearing	Non-targeted/broad community	February 9, 2021 Utica public hearing. The meeting was held by the governing body via Zoom and open to the public.	Representatives from Care House, Interfaith Volunteer Caregivers, Samaritan House, and Turning Point spoke about the benefits of their respective programs. Library Director requested funds for large print books.	The organizations that presented at the public hearing were allocated funding.	
37	Newspaper Ad	Non-targeted/broad community	Notice of Washington Township's public hearing was published in the Macomb Daily on January 3, 2021.	No comments were received.	N/A	
38	Public Hearing	Non-targeted/broad community	February 3, 2021 Washington Township public hearing. The meeting was held by the governing body remotely and was open to the public.	Comments on process allocations and additional comments from governing body.	N/A	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

Macomb County will primarily use the CDBG, HOME, and ESG program funds included in the following table to accomplish specific objectives identified in the 2019-2023 5-Year Consolidated Plan. The 2021 program year is the third in the current 5 Year Consolidated Plan.

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

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan	Narrative Description
			Annual Allocation:	Program Income:	Prior Year Resources:	Total:		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$1,878,057	\$40,000	\$0	\$1,918,057	\$3,836,114	These funds will leverage other public investments through community funds for infrastructure investments.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan	Narrative Description
			Annual Allocation:	Program Income:	Prior Year Resources:	Total:		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$1,679,219	\$91,630	\$0	\$1,770,849	\$3,541,698	These funds will be distributed throughout the jurisdiction of the Macomb HOME Consortium to support housing needs of low-to moderate-income residents.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	\$160,955	\$0	\$0	\$160,955	\$321,910	These funds will be used to support HMIS, Shelter Operations, and Rapid Rehousing.
Other	public - federal	Other	\$0	\$0	\$0	\$0	\$0	

Table 2 - Expected Resources – Priority Table

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

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

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

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

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

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

Emergency Solutions Grants will leverage additional investment as follows:

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

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

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

Annual Goals and Objectives

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Make Available Appropriate Housing	2019	2023	Affordable Housing Public Housing Homeless	LMI Housing Activities	Housing Rehabilitation Rental Housing Affordable Housing Units	CDBG: \$444,246 HOME: \$1,602,928	Homeowner Housing Added: 2 Household Housing Unit Homeowner Housing Rehabilitated: 101 Household Housing Unit Tenant-based rental assistance / Rapid Rehousing: 30 Households Assisted
2	Improve Public Facilities and Infrastructure	2019	2023	Non-Housing Community Development	Low/Mod Area Limited Clientele Activity	Accessibility/Barrier Free Improvements Public Facilities Public Improvements	CDBG: \$849,330	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 19960 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Address the Needs of Homeless & At-Risk Families	2019	2023	Homeless	Limited Clientele Activity ESG Activities	Rental Housing Emergency Shelters and Transitional Housing	CDBG: \$42,291 ESG: \$148,884	Tenant-based rental assistance / Rapid Rehousing: 35 Households Assisted Homeless Person Overnight Shelter: 580 Persons Assisted
4	Provide and Expand Human Services	2019	2023	Homeless Non-Homeless Special Needs Non-Housing Community Development Low- to Moderate-Income Households	Limited Clientele Activity	Senior and Youth Facilities and Services Public Services Food Bank Services	CDBG: \$206,580	Public service activities other than Low/Moderate Income Housing Benefit: 5389 Persons Assisted
5	Expand Planning, Grant Management and Capacity	2019	2023	Program Administration and Planning/Fair Housing	Grant Administration	Local and Regional Planning Fair Housing	CDBG: \$375,611 HOME: \$167,921 ESG: \$12,071	Other: 1 Other

Table 3 – Goals Summary

Goal Descriptions

1	Goal Name	Make Available Appropriate Housing
	Goal Description	2021 projects under this goal include: CHDO Operating, various Housing Rehabilitation Programs (HOME & CDBG), CHDO Set-Aside for affordable housing, HOME funded Tenant Based Rental Assistance (TBRA), and CDBG funds will also be used for housing rehabilitation delivery costs.
2	Goal Name	Improve Public Facilities and Infrastructure
	Goal Description	<p>The following public facilities and infrastructure improvement activities will be executed utilizing CDBG funds during the 2021 program year:</p> <p>City of Center Line: Playground Replacement</p> <p>Chesterfield Township: Senior Citizen Playground – Phase 2</p> <p>City of Eastpointe: Almond Street Reconstruction</p> <p>Harrison Township: Union Lake Sidewalks</p> <p>Macomb Township: ADA Sidewalk Ramps</p> <p>City of Richmond: Senior Center Door Replacement</p> <p>Shelby Township: 24 Mile Sidewalk Installation</p>
3	Goal Name	Address the Needs of Homeless & At-Risk Families
	Goal Description	<p>2021 projects under this goal include:</p> <p>ESG activities including HMIS, Rapid Re-Housing, and Shelter Operations.</p> <p>CDBG public services include MCREST and Turning Point.</p>

4	Goal Name	Provide and Expand Human Services
	Goal Description	<p>2021 projects under this goal include CDBG funded public services including:</p> <p>Macomb County Senior Chore Program: grass cutting and snow removal services to eligible residents from all 20 communities that participate in the Urban County CDBG program.</p> <p>Senior Center Programming and/or Staffing: Chesterfield Township, Macomb Township, Ray Township, and City of Richmond.</p> <p>Senior Dial-A-Ride: Harrison Township</p> <p>Large Print Library Books: City of Utica</p> <p>Armada PAL: Provide summer camp scholarships to low-income families. Available to residents of*: Armada Township and Armada Village</p> <p>Care House: Assistance to victims of child abuse. Available to residents of*: Armada Township, Armada Village, Bruce Township, Center Line, Eastpointe, Fraser, Lenox Township, Macomb Township, Mount Clemens, New Haven, Ray Township, Richmond City, Richmond Township, Romeo, Shelby Township, Utica and Washington Township.</p> <p>Interfaith Volunteer Caregivers: Provide assistance to senior citizens to complete household chores. Available to residents of*: Armada Village, Armada Township, Bruce Township, Center Line, Eastpointe, Fraser, Lenox Township, Macomb Township, Mount Clemens, Ray Township, Richmond City, Romeo, Shelby Township, Utica and Washington Township</p> <p>Samaritan House: Provide food assistance to income eligible families. Available to residents of*: Armada Township, Armada Village, Bruce Township, Ray Township, Romeo, Shelby Township, and Washington Township.</p> <p>Shelby Township Lions: Provide holiday food assistance to income eligible families. Available to residents of*: Shelby Township</p> <p>Wigs 4 Kids: Provide wigs needed due to medical issues to children of income eligible families. Available to residents of*: Chesterfield Township, Eastpointe, and Shelby Township.</p> <p>*If funds are not fully expended by the third quarter, remaining funding may be used to serve eligible residents from any of the 21 communities that participate in the Urban County CDBG program.</p>

5	Goal Name	Expand Planning, Grant Management and Capacity
	Goal Description	2021 projects under this goal include: CDBG, HOME, and ESG program administration Fair Housing Activities through the Fair Housing Center of Metropolitan Detroit Macomb Homeless Coalition planning activities

AP-35 Projects - 91.420, 91.220(d)

Introduction

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

#	Project Name
1	2021 ESG Activities
2	2021 HOME Administration
3	2021 HOME CHDO Operating
4	2021 HOME Housing Rehabilitation
5	2021 HOME Tenant Based Rental Assistance
6	2021 CDBG Administration
7	2021 HOME CHDO Set-Aside - Development of Affordable Housing
8	2021 CDBG Housing Rehabilitation
9	2021 CDBG Public Service Activities
10	2021 CDBG Housing Rehabilitation Program Administration
11	2021 CDBG Public Facilities and Infrastructure

Table 4 – Project Information

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

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

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

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

AP-38 Project Summary

Project Summary Information

1	Project Name	2021 ESG Activities
	Target Area	ESG Activities
	Goals Supported	Make Available Appropriate Housing
	Needs Addressed	Rental Housing Emergency Shelters and Transitional Housing
	Funding	ESG: \$160,955
	Description	The ESG 2021 annual allocation for Macomb County will be allocated to program administration, HMIS, shelter operations, and rapid re-housing.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 36 households will be assisted through rapid rehousing (RRH). Approximately 989 persons will be provided shelter in homeless shelters that received ESG shelter operations funding. Household income for families receiving RRH ESG assistance may not exceed 30% of the area median income. In addition, the household must qualify under the correct category of homeless as applicable to RRH.
	Location Description	As the only recipient of ESG funding in Macomb County, ESG funded activities serve all eligible Macomb County residents.
	Planned Activities	Program Administration - activity budget: \$12,071 HMIS - activity budget: \$5,000 Rapid Re-Housing - activity budget: \$48,484 Shelter Operations - activity budget: \$95,400
2	Project Name	2021 HOME Administration
	Target Area	Grant Administration
	Goals Supported	Expand Planning, Grant Management and Capacity
	Needs Addressed	Local and Regional Planning
	Funding	HOME: \$167,922
	Description	Costs related to administration of the HOME program.
	Target Date	6/30/2022

	Estimate the number and type of families that will benefit from the proposed activities	N/A - Administration costs only
	Location Description	The jurisdiction of the Macomb HOME Consortium.
	Planned Activities	Eligible administration expenses include but are not limited to: staff salaries and related costs; goods and services necessary for program administration; services under third party agreements; fair housing activities; preparation of the Consolidated Plan, Annual Action Plan and CAPER; and compliance with other federal requirements.
3	Project Name	2021 HOME CHDO Operating
	Target Area	LMI Housing Activities
	Goals Supported	Make Available Appropriate Housing
	Needs Addressed	Affordable Housing Units
	Funding	HOME: \$50,000
	Description	HOME funds will be used to support the operating costs of eligible Community Housing Development Organizations.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Funds will be used for CHDO operating. Families will benefit from activities conducted by the CHDO. The estimated number and type of families that will benefit from the activity will be reported in the corresponding project.
	Location Description	The CHDO must provide housing activities for households located within the jurisdiction of the Macomb HOME Consortium.
	Planned Activities	CHDO general operating funds.
4	Project Name	2021 HOME Housing Rehabilitation
	Target Area	LMI Housing Activities
	Goals Supported	Make Available Appropriate Housing
	Needs Addressed	Housing Rehabilitation
	Funding	HOME: \$1,001,044

	Description	HOME funds will be used to provide assistance to income eligible homeowners to complete necessary repairs to their home. Funding includes program income in the amount of \$91,630.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Approximately twenty-one (21) households with a combined household income that does not exceed 80% AMI will benefit from the proposed activity.
	Location Description	The activity will take place within the jurisdiction of the Macomb HOME Consortium.
	Planned Activities	The activity will provide assistance to income eligible homeowners to complete necessary repairs to their home. Funding includes program income received during the 2020 program year in the amount of \$91,630.
5	Project Name	2021 HOME Tenant Based Rental Assistance
	Target Area	LMI Housing Activities
	Goals Supported	Make Available Appropriate Housing
	Needs Addressed	Rental Housing
	Funding	HOME: \$300,000
	Description	HOME funds will be used to provide rental assistance to income eligible families.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 30 families with a combined household income not to exceed 60% AMI will benefit from this activity.
	Location Description	The activity will take place throughout the jurisdiction of the Macomb HOME Consortium.
	Planned Activities	Tenant based rental assistance will be provided to income eligible households.
6	Project Name	2021 CDBG Administration
	Target Area	Grant Administration

	Goals Supported	Expand Planning, Grant Management and Capacity
	Needs Addressed	Fair Housing Local and Regional Planning
	Funding	CDBG: \$375,611
	Description	Costs related to the administration of the CDBG program.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	N/A - program administration costs only.
	Location Description	The jurisdiction of the Urban County CDBG program.
	Planned Activities	Administrative costs include: Macomb County staff and program administration; fair housing activities through the Fair Housing Center of Metropolitan Detroit; and planning through the Macomb Homeless Coalition.
7	Project Name	2021 HOME CHDO Set-Aside - Development of Affordable Housing
	Target Area	LMI Housing Activities
	Goals Supported	Make Available Appropriate Housing
	Needs Addressed	Rental Housing
	Funding	HOME: \$251,883
	Description	The Macomb HOME Consortium must set aside 15% of its HOME allocation for housing development activities in which Community Housing Development Organizations (CHDOs) are the owner, developer or sponsor. The project will provide funds for either rental or homebuyer projects (new construction or acquisition and rehabilitation of existing). The housing must benefit income eligible households.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	The activity will assist up to two (2) families with household income that does not exceed 80% AMI.
	Location Description	The activity must take place within the jurisdiction of the Macomb HOME Consortium.

	Planned Activities	The activity will provide funds to a CHDO for the purpose of providing up to two new affordable housing units.
8	Project Name	2021 CDBG Housing Rehabilitation
	Target Area	LMI Housing Activities
	Goals Supported	Make Available Appropriate Housing
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$264,245
	Description	Provide assistance to income eligible homeowners to complete necessary repairs to their home. There are three different housing rehabilitation programs that are included under this project 1) Minor Home Repair; 2) Limited Housing Rehabilitation; and 3) Comprehensive Rehabilitation. Funding includes estimated program income received during the 2021 program year.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 70 families with a combined household income that does not exceed 80% AMI will benefit from the Minor Home Repair Program. It is also estimated that the Limited/Comprehensive Housing Rehabilitation Programs will assist 10 families with a combined household income that does not exceed 80% AMI.
	Location Description	This activity will take place in the jurisdiction of the Urban County CDBG program.
Planned Activities	Minor Home Repair - up to \$1,000 assistance Limited Housing Rehabilitation - up to \$10,000 in repairs + LBP abatement Comprehensive Housing Rehabilitation - up to \$40,000 in repairs + LBP abatement	
9	Project Name	2021 CDBG Public Service Activities
	Target Area	Limited Clientele Activity
	Goals Supported	Make Available Appropriate Housing
	Needs Addressed	Emergency Shelters and Transitional Housing Transportation Services Senior and Youth Facilities and Services Public Services Food Bank Services
	Funding	CDBG: \$248,870

Description	Provide services including, but not limited to: services for abused children, food assistance, senior citizen programs, homeless programs, and senior and youth programs. To be eligible for CDBG assistance, a public service must be either a new service or a quantifiable increase in the level of an existing service above which has been provided by or on behalf of the unit of general local government (through funds raised by the unit or received by the unit from the State in which it is located) in the 12 calendar months before the submission of the Action Plan. An exception to this requirement may be made if HUD determines that any decrease in the level of service was the result of events not within the control of the unit of general local government.
Target Date	6/30/2022
Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 5,389 persons will benefit from the proposed activities. Those persons will either be presumed beneficiaries or from households with incomes that does not exceed 80% AMI.

<p>Location Description</p>	<p>Macomb County Senior Grass Cutting & Snow Removal: Services to eligible residents from all 20 communities that participate in the Urban County CDBG program.</p> <p>Senior Center Programming and/or Staffing: Chesterfield Township, Macomb Township, Ray Township, and City of Richmond.</p> <p>Senior Dial-A-Ride: Harrison Township</p> <p>Large Print Library Books: City of Utica</p> <p>Armada PAL: Provide summer camp scholarships to low-income families. Available to residents of: Armada Township and Armada Village</p> <p>Care House: Assistance to victims of child abuse. Available to residents of: Armada Township, Armada Village, Bruce Township, Center Line, Eastpointe, Fraser, Lenox Township, Macomb Township, Mount Clemens, New Haven, Ray Township, Richmond City, Richmond Township, Romeo, Shelby Township, Utica and Washington Township.</p> <p>Interfaith Volunteer Caregivers: Provide assistance to senior citizens to complete household chores. Available to residents of: Armada Village, Armada Township, Bruce Township, Center Line, Eastpointe, Fraser, Lenox Township, Macomb Township, Mount Clemens, Ray Township, Richmond City, Romeo, Shelby Township, Utica and Washington Township</p> <p>Samaritan House: Provide food assistance to income eligible families. Available to residents of: Armada Township, Armada Village, Bruce Township, Ray Township, Romeo, Shelby Township, and Washington Township.</p> <p>Shelby Township Lions: Provide holiday food assistance to income eligible families. Available to residents of: Shelby Township</p> <p>Wigs 4 Kids: Provide wigs needed due to medical issues to children of income eligible families. Available to residents of: Chesterfield Township, Eastpointe, and Shelby Township.</p> <p>Turning Point: domestic violence shelter - undisclosed location. CDBG funds will be used to shelter residents in need from: Chesterfield Township, Eastpointe, Fraser, Mount Clemens, Richmond City, Romeo, Shelby Township, Utica and Washington Township.</p> <p>MCREST: rotation homeless shelter. CDBG funds will be used to cover shelter related costs when operating in the following communities: Armada Township, Armada Village, Bruce Township,</p>
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		Chesterfield Township, Eastpointe, Fraser, Lenox Township, Mount Clemens, Ray Township, Richmond City, Romeo, Shelby Township, Utica, and Washington Township.
	Planned Activities	<p>Macomb County Senior Grass Cutting & Snow Removal: \$51,150</p> <p>Senior Center Programming and/or Staffing: Chesterfield Township \$12,350; Macomb Township \$28,600; Ray Township \$1,250; Shelby Township \$5,010; and City of Richmond \$1,990.</p> <p>Harrison Township Senior Dial-A-Ride: \$17,750</p> <p>Large Print Library Books: City of Utica \$600</p> <p>Armada PAL: Provide summer camp scholarships to low-income families \$2,100</p> <p>Care House: Assistance to victims of child abuse \$53,179.25</p> <p>Interfaith Volunteer Caregivers: Provide assistance to senior citizens to complete household chores \$9,994.50</p> <p>Samaritan House: Provide food assistance to income eligible families \$14,805.75</p> <p>Shelby Township Lions: Provide holiday food assistance to income eligible families \$5,000</p> <p>Wigs 4 Kids: Provide wigs needed due to medical issues to children of income eligible families \$2,800</p> <p>MCREST: Provide overnight shelter for the homeless \$21,428.75</p> <p>Turning Point: Provide shelter to victims of domestic abuse \$20,861.75</p>
10	Project Name	2021 CDBG Housing Rehabilitation Program Administration
	Target Area	LMI Housing Activities
	Goals Supported	Make Available Appropriate Housing
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$180,000
	Description	Costs related to the administration of the County's Housing Rehabilitation Programs.
	Target Date	6/30/2022

	Estimate the number and type of families that will benefit from the proposed activities	The funding for this activity is dedicated to administration of the County's Housing Rehabilitation programs. Accomplishment data will be reported under each activity.
	Location Description	The activity will take place within the twenty (20) CDBG participating communities and the jurisdiction of the Macomb HOME Consortium.
	Planned Activities	Costs related to administration of the County's Housing Rehabilitation programs.
11	Project Name	2021 CDBG Public Facilities and Infrastructure
	Target Area	Low/Mod Area Limited Clientele Activity
	Goals Supported	Improve Public Facilities and Infrastructure
	Needs Addressed	Public Improvements Public Facilities Accessibility/Barrier Free Improvements
	Funding	CDBG: \$849,330
	Description	Public facilities and infrastructure projects may include acquisition, construction, reconstruction, rehabilitation, or installation of public facilities and improvements except as provided in 24 CFR 570.207(a), carried out by the recipient or other public or non-profit entities.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 19,960 will benefit from the proposed activities. The beneficiaries will either qualify under the presumed benefit or as having a household income that does not exceed 80% AMI.

<p>Location Description</p>	<p>Center Line Park Improvements at the following locations: 25355 Lawrence Ave, 23941 Lawrence, and 8517 State Park - all located in the City of Center Line</p> <p>Chesterfield Township Senior Center: 47257 Sugarbush, Chesterfield Township, MI</p> <p>Eastpointe Almond Street Reconstruction: improvements will take place on Almond Street between Semrau and Stephens</p> <p>Harrison Township Union Lake Sidewalks: sidewalks will be installed on Union Lake Road between Shook and 16 Mile Road</p> <p>Macomb Township Sidewalk ADA Ramp Replacement: ADA ramps will be installed at various street corners in the area of Garfield, 21 Mile Road, Haverhill and Tilch</p> <p>City of Richmond Senior Center Door Replacement: 36164 Festival, Richmond, MI 48062</p> <p>Shelby Township 24 Mile Road Sidewalk Installation Project: sidewalks will be installed on 24 Mile Road between Shelby Road and Arthur Drive.</p>
<p>Planned Activities</p>	<p>Center Line Park Improvements: Budget: \$150,000</p> <p>Chesterfield Township Senior Center: Budget: \$92,730</p> <p>Eastpointe Almond Street Reconstruction: Budget: \$ 150,000</p> <p>Harrison Township Union Lake Sidewalks: Budget \$150,000</p> <p>Macomb Township Sidewalk ADA Ramp Replacement: Budget: \$150,000</p> <p>City of Richmond Senior Center Door Replacement: Budget: \$6,600</p> <p>Shelby Township 24 Mile Road Sidewalk Installation Project: Budget: \$150,000</p>

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

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

The Urban County of Macomb is governed by “home rule” and therefore allocates as much CDBG funding as possible to its 20 member communities, less program administration, housing rehabilitation, and public services. As such, the summary of funds provided below includes all available sources of funds for the program. The 20 member communities includes:

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

The County will continue to provide annual allocations for all 20 communities for the 2021 program year for public service activities. The communities are responsible for identifying activities and targeted assistance areas, based on citizen input informed by law and regulation, to address local needs and priorities that are consistent with the 2019-2023 Consolidated Plan.

During the review of the County's 2019-2023 Consolidated Plan, the U.S. Department of Housing and Urban Development - Office of Fair Housing and Equal Opportunity noted that the County's Consolidated Plan did not focus enough funds to areas of low-income and minority concentration. Based on this feedback, the County agreed to allocate CDBG bricks and mortar funds on a competitive basis. The scoring criteria for the competition would award higher points to projects that served areas of minority

concentration. For the 2021 program year, seven (7) of the Urban County's twenty (20) communities submitted projects through the competition. The current available funding allowed the County to fund all seven projects (no applications were rejected). Two of the projects are located in the County's lowest-income and highest minority concentration areas (Center Line and Eastpointe). Of the \$849,330 made available through the competition, \$300,000 or 35% was awarded to these projects.

Geographic Distribution

Target Area	Percentage of Funds
Low/Mod Area	16
Limited Clientele Activity	13
Grant Administration	14
LMI Housing Activities	53
ESG Activities	4
Non-Target Spot Blight	0

Table 5 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Macomb County's CDBG, HOME, & ESG programs are administered through Macomb Community Action. The County's CDBG program encompasses a large geographic area (20 communities) including diverse participating communities. Communities located in the southern end of the County (Centerline, Eastpointe, and Mount Clemens) tend to have concentrations of eligible census block groups, but communities located outside of the areas of concentration also have lower-income families that are in need. As a result each community is provided public service funds on an annual basis. CDBG funds dedicated for bricks and mortar projects are allocated on a competitive basis. The remaining funds are used for program administration and housing rehabilitation activities.

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

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

Discussion

The Macomb "Urban County" CDBG program includes the following units of general location government: the Cities of Mount Clemens, New Baltimore, Eastpointe, Center Line, Fraser, Richmond,

and Utica; the Townships of Richmond, Bruce, Chesterfield, Washington, Ray, Shelby, Harrison, Lenox, Armada, and Macomb; and the Villages of Romeo, New Haven and Armada.

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

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

Affordable Housing

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

Introduction

In alignment with the 2019-2023 Consolidated Plan, the County has identified a specific housing objective, Objective #2 - Make Available Appropriate Housing, to be of high importance for the 2021 program year. The one-year goals provided in the following charts include the affordable housing activities for all members of the Macomb HOME Consortium. The activities are funds with CDBG, HOME or ESG funds.

One Year Goals for the Number of Households to be Supported	
Homeless	35
Non-Homeless	183
Special-Needs	0
Total	218

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	65
The Production of New Units	2
Rehab of Existing Units	151
Acquisition of Existing Units	0
Total	218

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

Discussion

Table Summary: Non-homeless activities includes: 30 households assisted through HOME funded TBRA; production of 2 new housing units will be funded with CHDO set-side funds; 21 homes rehabilitated through HOME funds (consortium-wide); Sterling Heights will provide minor home repair assistance to 37 households and rehabilitate 8 homes with CDBG funds; Clinton Township will use CDBG funds to rehabilitate 5 homes; and the Urban County of Macomb will use CDBG funds to provide minor home repairs to 70 homes and rehabilitate 10 homes. The City of Roseville did not allocate any CDBG towards affordable housing activities.

The County's ESG funds will be used to assist those who are currently experiencing homelessness through rapid re-housing activities. The rapid re-housing program is expected to assist 35 households. As the only recipient of ESG funds in Macomb County, ESG funded activities are available to all eligible residents of Macomb County.

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

Introduction

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

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

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

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

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

In order to make the County's 2021 Annual Action Plan more accessible to residents of public housing, a copy of the plan was mailed to each PHA. The County's cover letter to the PHA requested that the plan be posted in an area that was accessible to residents. The cover letter also stated that homeownership opportunities were available for residents of public housing and the applicable contact information for those interested.

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

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

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

troubled.

Discussion

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

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

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

Introduction

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

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

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

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

The CoC has an Outreach and Engagement Committee/PATH program that performs street outreach on the streets, soup kitchens, warming centers, drop-in centers, and other locations commonly frequented by homeless persons. The program aims to help literally homeless persons with mental health issues, but provides resources to anyone seeking assistance. Homeless persons are offered help with identifying and securing housing, referred to supportive services and linked with mainstream benefits and resources. The COVID-19 pandemic has made outreach especially challenging. The Outreach Team has had to suspend efforts at times due to COVID exposures, etc. During the times when community outreach can't occur due to the pandemic, the Team works with community partners to continue to provide housing and resources to the community. The Outreach and Engagement Committee will continue to perform outreach efforts to house and shelter as many people as resources allow, in an effort to reduce homelessness.

Addressing the emergency shelter and transitional housing needs of homeless persons

The 2021 Annual Action Plan implements these objectives to address emergency shelter and transitional housing needs by providing funding as follows: Continuum of Care for coordination of homeless prevention and housing activities (CDBG); MCREST for the cost of providing overnight shelter to the homeless (CDBG); Turning Point for the cost of providing overnight shelter to domestic violence or sexual

assault survivors (CDBG); and shelter operations and essential services funds (ESG) to MCREST and Turning Point.

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

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

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

The 2021 Annual Action Plan implements these objectives by providing ESG funding as follows: rapid rehousing to provide rental assistance and/or financial assistance to literally homeless persons. The RRH program will be administered by MCREST, a local emergency shelter. The County will provide program oversight and monitoring. ESG requires that case management is provided in conjunction with assistance which should help prevent people from becoming homeless again. Case managers also provide referrals to other service providers to provide comprehensive services to clients. Case managers assist clients with setting goals, finding employment and completing applications for mainstream benefits which can increase the income of clients reducing the likelihood of becoming homeless again.

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

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

The CoC will work to implement goals and strategies contained in the 2020-2022 Annual Plan including increasing access to stable and affordable housing. The CoC aims to do this by securing additional Moving Up Vouchers, creating a Moving Up Voucher waitlist and working with local public housing authorities.

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

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

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

Discussion

During 2021 program year, the County plans to undertake the following activities to address the supportive services needs for persons who are not homeless but have other special needs (elderly, frail, persons with disabilities, etc.): 1) Senior Activity Programs: Chesterfield Twp, Macomb Twp, Ray Twp, Richmond and Shelby Twp; 2) Large Print Books: Utica; 3) Dial-A-Ride: Harrison Twp ; 4) Samaritan House and the Shelby Lions Club will provide food assistance to LMI families; 5) Interfaith Volunteer Caregivers will assist seniors with indoor and outdoor chores; and 6) Macomb Community Action will provide seniors with grass cutting and snow removal services. All of these activities will be funded through CDBG. In addition to these services, the County's Housing Rehabilitation program is available to this population as well as the Minor Home Repair program which can be used to make small scale home improvement repairs. The Housing Rehabilitation program has an accessibility component that can be used to make a home more handicap accessible for elderly or disabled persons. The Housing Rehabilitation program is funded through HOME and CDBG and Minor Home Repair is funded through CDBG.

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

Introduction

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

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

Planned actions include:

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

Discussion

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

Fair Housing Update:

- 1) Completed an Analysis of Impediments to Fair Housing (AI) in 2019 and commitment to address the impediments or further goals included in the AI;
- 2) Implement subrecipient fair housing policy monitoring; and
- 3) Implementation of a competitive funding allocation process, including fair housing-related criteria, for sub-grants to municipalities participating in the Urban County CDBG and/or County-led HOME Consortium.

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

Introduction

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

Actions planned to address obstacles to meeting underserved needs

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

Actions planned to foster and maintain affordable housing

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

Actions planned to reduce lead-based paint hazards

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

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

Actions planned to reduce the number of poverty-level families

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

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

Actions planned to develop institutional structure

The County has excellent administrative capacity, with capable staff, excellent relationships with communities and non-governmental entities, and innovative programs. The following are therefore considered for the coming year:

Management Capacity

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

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

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

Sub-recipient Monitoring - The County and the MHC will continue to monitor and assist sub-recipients and CHDOs in 2021 as required per the Uniform Grant Guidance found at 2 CFR 200. Monitoring will be

performed through risk assessment and technical assistance will be provided based on the degree of need.

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

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

Discussion

Fair Housing

The County will address issues identified in the County's Analysis of Impediments to Fair Housing during the period of July 1, 2021 to June 30, 2022. Communities that participate in the Urban County CDBG program must also commit to addressing at least two (2) impediments each year. Program staff monitor community compliance. In addition, the County will provide CDBG funding to the Fair Housing Center of Metropolitan Detroit, which provides counseling and referral programs, including housing discrimination complaint reception, investigation and resolution services and provision of advice, counsel and referral services for other related inquiries.

Minority and Women's Business Enterprises

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

Monitoring (CDBG, HOME & ESG)

Internal Monitoring

- Timeliness of expenditures is monitored regularly through IDIS and the County's financial system; and
- Various IDIS reports, draw-down and supporting documentation will be used for internal monitoring purposes to track project implementation, quality and accomplishments

Subrecipient Monitoring

The County developed a Subrecipient Monitoring & Management Policy in compliance with 2 CFR

200. The policy provides a consistent methodology for conducting risk analyses and monitoring evaluations for all applicable subrecipients.

Major steps include:

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

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

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

HOME Rental Monitoring

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

Program Specific Requirements

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

Introduction

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

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

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	40,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	40,000

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	85.00%

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

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

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

by the CHDO from private donations. In the rental housing LIHTC may be used as an additional form of investment.

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

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

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

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

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

The Macomb HOME Consortium has not planned activities under 24 CFR 92.206(b) and therefore will not use HOME funds to refinance single family or multifamily housing debt during the 2021 program year.

Emergency Solutions Grant (ESG)

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

Please see the attached (see AD-26) Emergency Solutions Policy and Procedures dated 12/14/2020.

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

The Macomb Continuum of Care (CoC) / Macomb Homeless Coalition operate under a Coordinated Assessment model that provides for a consistent pre-screening and intake assessment of all clients presenting themselves for services within the Continuum. The agencies included in the coordination include emergency shelters, warming centers(s), transitional housing programs, permanent housing programs, the youth shelter and street outreach and those providing short term rental and financial assistance to very low income and homeless individuals and families. The CoC operates under a "No Wrong Door" approach. Individuals and families seeking services are able to enter the coordinated

entry system at different access points.

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

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

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

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

Sub-awards are granted through a Notice of Funding Availability (NOFA). Each member of the **COC**, including community and faith-based organizations are notified of the NOFA through the CoC listserv. To be eligible to apply under the NOFA the service provider must have a physical presence in Macomb County and must serve Macomb County residents. All applications that contain the proper documents are reviewed by a panel and ranked according to certain criteria, such as, but not limited to: 1) project description/narrative 2) program model 3) performance measures such as number of clients assisted by the agency and review of exit data 5) active homeless participation 6) previous experience 7) active CoC participation and 8) ability to provide 100 percent match. There is also the option for applicants to earn bonus points by being able to provide excess match.

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

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

The policy-making entity for the County is the Macomb County Board of Commissioners unless otherwise authorized. In order to comply with 24 CFR 576.405(a), staff has consulted with the Macomb County CoC general membership and the Board of Directors which currently includes one formerly homeless person. In addition, Macomb Community Action staff attend monthly CoC general membership meetings to present and solicit input regarding ESG policies and procedures and funding decisions.

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

5. Describe performance standards for evaluating ESG.

The process for evaluating ESG activities involves a review of: 1) project description/narrative 2) program model 3) performance measures such as number of clients assisted by the agency and review of exit data 5) active homeless participation 6) previous experience 7) active CoC participation and 8) ability to provide 100 percent match. There is also the option for applicants to earn bonus points by being able to provide excess match.

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

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

Note: The overall LMI benefit of 85% for this plan includes only the 2021 program year - 1 year certification

Additional HOME program information:

- **Fair Housing and Affirmative Marketing:** Agreements state that the Developer shall not discriminate based on race, religion, marital status, national origin, gender or disability status, and shall affirmatively market units to segments of the population least likely to apply, in conformance with 24CFR Part 92.351. For projects containing five or more HOME assisted units, the Developer will be required to submit an Affirmative Fair Housing Marketing Plan to the PJ (County) and include a description of their efforts to affirmatively market units to the MHC (County) annually.
- **HOME Affordable Homeownership Limits:** For homebuyer assistance or for rehabilitation of owner-occupied single family housing, the Macomb HOME Consortium follows the HOME affordable homeownership limits for the area as provided by HUD.
- **HOME Application Process:** Applications for HOME funded housing rehabilitation are available on the County's website and at the Macomb Community Action Office of Community Development. Applications are taken on a first-come, first-serve basis. The Macomb HOME Consortium does not currently have an applicant preference. CHDO project funding is allocated by the members of the MHC. When HOME funds are made available for developers, the Request for Proposals is posted on <https://www.bidnetdirect.com/>.
- **New Unit Production:** Projects may include homebuyer, rental and lease to purchase.

Attachments

Grantee Unique Appendices

**MACOMB HOME CONSORTIUM
RECAPTURE AND RESALE PROVISIONS**

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

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

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

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

- The length of the long term affordability:

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

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

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

MACOMB HOME CONSORTIUM RESALE – FAIR RETURN ON INVESTMENT

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

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

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

EXAMPLES OF FAIR RETURN ON INVESTMENT

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

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

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

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

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

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

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

Macomb County Community Development

Emergency Solutions Grant

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

Revised: December 14, 2020

Table of Contents

Program Description	3
I. Grant Terms	3
II. Target Population	3
III. Use of the Funds	4
IV. Roles and Responsibilities	5
V. Eligibility Determination	7
VI. Program Support Information	10
VII. Conflicts of Interest	14
VIII. Other Federal Requirements	15
IX. Violence Against Women Act Policy	15
X. Equal Access Policy	16
ESG Rapid Rehousing Policy	17
ESG Homelessness Prevention Policy	20
ESG HMIS Component Policy	23
ESG Emergency Shelter Component Policy	24
Violence Against Women Act Policy & Emergency Transfer Plan	28
Notice of Occupancy Rights	36
Emergency Transfer Request	41
Certification of Domestic Violence, Dating Violence, Sexual Assault or Stalking	43
Acknowledgement of Receipt	45
Rental Assistance Agreement	46
Lease Addendum	48
Notice of Equal Access in Accordance with an Individual's Gender Identity	49

Program Description

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

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

I. Grant Terms

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

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

II. Target Population

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

The **Emergency Shelter** component of this program is targeted to serve those homeless individuals and families who are residing in emergency shelters within Macomb County. The Rapid Re-housing assistance must be provided in accordance with the County's written procedures provided in Attachment #4.

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

The **Rapid Re-housing** component of this program is targeted to serve program participants who meet the criteria under paragraph (1) of the "homeless" definition in 24 CFR 576.2 or who meet the criteria under paragraph (4) of the "homeless" definition and live in an emergency shelter or other

place described in paragraph (1) of the "homeless" definition. The Rapid Re-housing assistance must be provided in accordance with the County's written procedures provided in Attachment #1.

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

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

III. Use of the Funds

There are six categories of eligible activities for ESG funds:

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

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

Street Outreach

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

Emergency Shelter

ESG funds may be used for costs of providing essential services to homeless families and individuals in emergency shelters, renovating buildings to be used as emergency shelters and operating emergency shelters. See **Attachment #4** for current eligible costs.

Homelessness Prevention Assistance

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

Rapid Re-housing Assistance

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

HMIS

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

ESG funds cannot be used for/to:

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

IV. Roles and Responsibilities

Macomb County Community Development will:

- Consult with the CoC when:
 - Determining how to allocate ESG funds each year,
 - Developing performance standards for projects and activities assisted by ESG funds,
 - Evaluating outcomes of projects and activities assisted by ESG funds, and
 - Developing funding, policies and procedures for the administration and operation of the HMIS

- Evaluate the quality of services based on documented outcomes of subrecipients, in partnership with the CoC.

The HMIS Lead Agency will:

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

Subrecipients will:

- Provide allowable services as defined within the regulations and as specified in their contract with Macomb County.
- Ensure compliance with grant terms and provide Macomb County Community Development access to financial and programmatic records.
- Coordinate and integrate, to the maximum extent practicable, ESG funded activities with other programs targeted to homeless people, as well as mainstream housing, health, social services, employment, education and youth programs to provide a strategic, community-wide system to connect participants to such services, as well as prevent and end homelessness. Subrecipient's will work closely with community agencies to collaborate and learn strategies for delivering services efficiently and effectively to end homelessness in Macomb County. A list of programs targeted to homeless people and mainstream resources can be found at 24 CFR 576.440 (b) and (c).
- Use the CoC's coordinated assessment system. Domestic violence agencies may choose not to use the coordinated assessment system, but may use an alternative, comparable system.
- Conduct an intake and assessment on each client to determine eligibility for assistance for emergency shelter, essential services and other types of services required to regain stability in permanent housing. Intake and assessment are standardized forms within the HMIS System. A copy of these forms must be maintained in the participant file.
- Require case managers to contact program participants receiving Rapid Re-housing or Homelessness Prevention at least once per month. When possible, contact should be in person.

- Develop a plan with program participants receiving Rapid Re-housing or Homelessness Prevention to retain permanent housing once ESG assistance ends.
- Ensure that program participants receiving medium-term (4-8 months) rental assistance through Rapid Re-housing or Homelessness Prevention pay 30% of their gross monthly income or 10% of their net monthly income towards rent.
- Meet the minimum safety, sanitation and privacy standards outlined in 24 CFR 576.403.
- Enter client information into HMIS. Domestic violence agencies use an alternative, comparable system.
- Routinely review and correct HMIS data quality issues and monitor outcome performance.
- Maintain financial and client level records to support billings. Retain records for five years.
- Request payment and provide necessary supportive documentation to Macomb County Community Development.
- Collect and submit quarterly Progress Reports that address specific performance outcomes supported by HMIS data. Domestic violence agencies use an alternative, comparable system.
- Involve homeless individuals and families, to the maximum extent practicable, in maintaining and operating facilities assisted under ESG, as well as in providing services assisted under ESG.
- Refrain from engaging in inherently religious activities, such as worship, religious instruction or proselytization as part of the programs or services funded under ESG. If an organization conducts these activities, the activities must be offered separately, in time or location, from the programs or services funded under ESG, and participation must be voluntary for program participants.
- Refrain from discriminating against a program participant or prospective program participant on the basis of religion or religious belief.
- Make known that the use of facilities, assistance and services are available to all on a nondiscriminatory basis. The way in which the subrecipient communicates this must be likely to reach persons of any particular race, color, religion, sex, age national origin, familial status and disability.
- Ensure compliance with federal regulations. It is the responsibility of the sub-recipient to maintain familiarity with all applicable regulations.
- Develop, implement and follow their own policies.

V. Eligibility Determination

Participant Files

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

Release of Information Form – HMIS

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

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

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

- Driver's License/State Identification Card

- Social Security Card
- Medicaid Card (as a last resort *for children only*)
- Birth Certificate
- Passport

Certifying Homeless Status

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

Preferred Order for Documentation

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

1. Third Party

- a. Source Documents
 - i. Pre-existing records (HMIS shelter stay record, hospital discharge or court ordered eviction notice, etc.)
- b. Written
 - i. Official communication (agency email or letter written on agency stationery)
 - ii. Must include service dates
 - iii. Signed and dated by agency representative certifying statement as true and complete
 - iv. Additional standards depend on criteria/condition of Homeless Definition being used
- c. Oral
 - i. Recorded oral statements by intake staff or of third party providing verification
 - ii. Must include service dates
 - iii. Must be signed and dated by intake staff certifying statement as true and complete

2. Intake Staff Observations

- a. Intake staff notes on their observations/assessments
 - i. Must be signed and dated by intake staff certifying statement as true and complete

3. Self-Certification*

- a. Written statements must be signed and dated
- b. If self-certification must be verified:
 - i. Documentation that certification was verified or due diligence documentation

4. Due Diligence

- a. Describe efforts to obtain third party verification (phone logs, email, letters, etc.)
- b. Describe obstacles to obtaining verification/documentation
- c. Must be signed and dated by intake staff

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

Record Keeping Requirements – Acceptable Forms of Documentation

- 1. Category 1- Literally Homeless
 - a. HMIS street outreach service record
 - b. HMIS shelter stay record
 - c. Written observation by an intake worker

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

Verification of Income for Rapid Re-housing and Homelessness Prevention

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

household must provide four (4) of their most recent, consecutive paystubs, if paid bi-weekly and eight (8) of their most recent, consecutive paystubs, if paid weekly.

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

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

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

VI. Program Support Information

Prioritization for Rapid Re-housing and Homelessness Prevention

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

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

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

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

Rent reasonableness must be determined by the subrecipient. Rent reasonableness is determined by considering the location, quality, amenities, size, condition, type and age of the unit. Maintenance services and utilities paid by the owner/landlord should also be considered. The rent amount of similar units should be compared to the prospective unit. The "Rent Reasonableness Checklist and Certification" form must be used to compare three (3) units to the prospective rental unit. Subrecipients can find comparable units through rental listing websites, newspaper advertisements, real estate agents, online postings, etc. Subrecipients should include print outs of advertisements, case notes or other forms of documentation in all client files. In order to be considered reasonable, rents must fall within \$100 of the average of the three comparable units. Another acceptable method of documentation is written verification signed by the property owner or management company, on letterhead, affirming that the rent amount charged is comparable to current rents charged for similar units managed by the same owner. In order for rents to be paid with ESG funds they must meet **both** FMR and rent reasonableness requirements.

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

**Utility allowance schedule for Region D (which includes Macomb County) is determined and updated annually by the Michigan State Housing Development Authority. Utility allowance schedules

can be found at http://www.michigan.gov/mshda/0,4641,7-141-5555_8002_26576_26582-135005--00.html

ESG Assistance for Mobile Homes

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

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

Rental Assistance Agreements & Leases

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

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

All ESG subrecipients must ensure that the requirements under 24 CFR part 5, subpart L are included or incorporated into rental assistance agreements (**Attachment #10**). All new leases must include or incorporate the requirements under 24 CFR part 5, subpart L. Please see **Attachment #5** for more specific program requirements.

Admission, Diversion, and Referral and Discharge by Emergency Shelters

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

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

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

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

Assessing, Prioritizing and Reassessing Needs for Emergency Shelter Essential Services

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

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

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

Standards for Targeting and Providing Street Outreach Essential Services

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

Confidentiality

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

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

1. All program participant records containing personally identifying information must be kept in a secure location.
2. All program participants will sign consent forms and be informed of their rights regarding personal information.
3. When ESG subrecipients discuss program participants via email or any other form of electronic communication, they will not share participant's names. HMIS client identification numbers or an alternative system will be used instead.
4. The address or location of any domestic violence, dating violence, sexual assault or stalking shelter will not be made public, except with written authorization of the chief person operating the shelter.
5. The address or location of any housing of any program participant will not be made public, except as provided under preexisting privacy policy of the subrecipient and consistent with state and local laws regarding privacy and confidentiality.

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

Subrecipients terminating a program participant's ESG assistance for violating program requirements must provide a formal termination process that recognizes the rights of individuals affected. Subrecipients must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in

the most severe cases. The formal process is only required after a participant has received assistance and is then terminated from receiving continued assistance. Program participants must have the opportunity to provide objection to termination either in writing or orally. Program participants must also be provided with written notification of final determination. Assistance to a program participant who has been terminated from the program may resume at a later date.

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

Homeless Participation Requirements (24 CFR 576.405)

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

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

CFDA Number

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

Insurance Coverage

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

Grant Management

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

Grant Amendments

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

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

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

Payment Requests

Payment requests are to be submitted on the required Macomb County Community Development Service Voucher. Back-up documentation of costs must be submitted with the voucher. The dates that

Service Vouchers must be submitted and the period covered by each voucher will be stated in the sub-recipients' contracts.

Match Requirements

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

The following match requirements must be met:

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

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

Fraud Procedures

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

Quarterly Progress Reports

During the program year, the subrecipient shall prepare and submit to Macomb County Community Development every three months or when specifically requested, a Progress Reporting. The subrecipient must also submit a final Cumulative Report covering period program year. This report is due by the fifteenth day after the end of the program year.

VII. Conflicts of Interest

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

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

(1) *Conflicts prohibited.* No person described in paragraph (b)(2) of this section who exercises or has exercised any functions or responsibilities with respect to activities assisted under the ESG program, or who is in a position to participate in a decision-making process or gain inside information with

regard to activities assisted under the program, may obtain a financial interest or benefit from an assisted activity; have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity; or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has family or business ties, during his or her tenure or during the one-year period following his or her tenure.

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

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

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

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

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

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

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

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

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

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

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

(F) Any other relevant considerations.

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

VIII. Other Federal Requirements

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

IX. Violence Against Women Policy

Please see **Attachment #5** for Macomb County Community Development's Violence Against Women Act Policy and Emergency Transfer Plan.

X. Equal Access Policy

Please see **Attachment #12** for Macomb County Community Development's Equal Access Policy in accordance with 24 CFR 5.106, "Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs".

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

RAPID RE-HOUSING (RRH)	
Eligibility	
<p>To receive ESG rapid re-housing assistance, an individual or family must demonstrate at initial evaluation that it is literally homeless (referred to as Category 1 in the Homeless Definition Final Rule). An individual or family is defined as "literally homeless" if (1) living in a public or private place not meant for human habitation, (2) living in a temporary shelter, which includes congregate shelters and transitional housing, or (3) exiting an institution where the individual or family has resided for 90 or fewer days and was living in shelter or in a place not meant for habitation before entering the institution. RRH assistance is also available to people fleeing or attempting to flee domestic violence (Category 4 in the Homeless Definition Final Rule) if they are also literally homeless (24 CFR part 576.104).</p> <p>Homeless service providers agree to only accept referrals from central intake and refer all households seeking assistance to central intake for assessment. Coordination among homeless service providers with central intake allows for consistent assessment and community targeting.</p>	
Need and Continued Eligibility	
<p>ESG recipients and subrecipients must conduct regular re-evaluations, at least annually, of program participants receiving RRH assistance. To continue to receive ESG assistance, a program participant's re-evaluation must demonstrate eligibility based on:</p> <ul style="list-style-type: none"> • Income. The program participant's household annual income must be less than or equal to <u>30% (AMI)</u>. • Lack of resources and support networks. The program participant's household must continue to lack sufficient resources and support networks to retain housing without ESG assistance. • Need. The recipient or subrecipient must determine the amount and type of assistance that the individual or family will need to (re)gain stability in permanent housing. 	
Financial Assistance Guidelines	
Type of Assistance	Guidance
Rental Arrearages	<ul style="list-style-type: none"> • Not to exceed six (6) months • Not to exceed \$4,000 per household • Any combination of three (3) types of rental assistance must not exceed twenty-four (24) months during any three year period
Rental Application Fees	<ul style="list-style-type: none"> • May pay for rental housing application fee
Short-Term Rental Assistance	<ul style="list-style-type: none"> • Not to exceed three (3) months • Not to exceed \$3,500 per household for this category. • Cannot be used with other subsidies • Any combination of three (3) types of rental assistance must not

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

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

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

Attachment #2

**ESG Homelessness Prevention Policy
Emergency Solutions Grant (ESG) Program**

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

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

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

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

Attachment #3

ESG HMIS Component Policy

Emergency Solutions Grant (ESG) Program

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

HMIS Eligible Costs (24 CFR 576.107)

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

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

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

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

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

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

Attachment #4

ESG Emergency Shelter Component Policy

Emergency Solutions Grant (ESG) Program

ESG funds may be used for costs of providing essential services to homeless families and individuals in emergency shelters, renovating buildings to be used as emergency shelters and operating emergency shelters.

Emergency Shelter Component Eligible Costs: (576.102)

Essential Services:

Case management: 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;
- Conducting the initial evaluation 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; and
- Developing an individualized housing and service plan, including planning a path to permanent housing stability.

Child care: The costs 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. 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 and are provided by licensed medical professionals. Emergency Solutions Grant (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 a program participant 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 noncosmetic 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.
- Emergency Solutions Grant (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 and job 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 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; and
- The travel costs of 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 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.

Renovation: 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). The emergency shelter must be owned by a government entity or private non-profit organization.

Shelter operations: Eligible costs are the costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter. Where no appropriate emergency shelter is

available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual.

1. 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.

2. Minimum period of use:

a. Renovated buildings. Each building renovated with ESG funds must be maintained as a shelter for homeless individuals and families for not less than a period of 3 or 10 years, depending on the type of renovation and the value of the building. The "value of the building" is the reasonable monetary value assigned to the building, such as the value assigned by an independent real estate appraiser. The minimum use period must begin on the date the building is first occupied by a homeless individual or family after the completed renovation. A minimum period of use of 10 years, required for major rehabilitation and conversion, must be enforced by a recorded deed or use restriction.

- Major rehabilitation. If the rehabilitation cost of an emergency shelter exceeds 75 percent of the value of the building before rehabilitation, the minimum period of use is 10 years.
- Conversion. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the minimum period of use is 10 years.
- Renovation other than major rehabilitation or conversion. In all other cases where ESG funds are used for renovation, the minimum period of use is 3 years.

Essential services and shelter operations. When ESG funds are solely for essential services or shelter operations, the 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 does not need to limit these services or shelter to a particular site or structure, so long as the site or structure serves the same type of persons originally served with the assistance (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or serves homeless persons in the same area where subrecipient originally provided the services or shelter.

Maintenance of effort. The maintenance of effort requirements under 576.101(c), which apply to the use of ESG funds for essential services related to street outreach, also apply for the use of such funds for essential services related to emergency shelter.

Attachment #5

Macomb County

Macomb Community Action – Community Development

Violence Against Women Policy and Emergency Transfer Plan

Background

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

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

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

Applicability

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

Emergency Shelters (24 CFR 576.409)

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

Notice to Applicants and Tenants (24 CFR 5.2005)

All County subrecipients must provide each of its applicants and tenants with the Notice of Occupancy Rights (**Attachment #6**) and the Certification Form (**Attachment #8**). The Certification Form is to be completed by a tenant in an instance of domestic violence, dating violence, sexual assault or stalking. Subrecipients must document that clients were informed of their rights and provided copies of the notices. A signed copy of acknowledgement (**Attachment #9**) must be maintained in client files.

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

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

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

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

Rental Agreements and Leases (24 CFR 576.409)

All ESG subrecipients must ensure that the requirements under 24 CFR part 5, subpart L are included or incorporated into rental assistance agreements (**Attachment #10**).

All new leases must include or incorporate the requirements under 24 CFR part 5, subpart L. All current leases, signed on or after December 16, 2016 should have a VAWA lease addendum (**Attachment #11**) incorporating the requirements of 24 CFR part 5, Subpart L. The lease addendum should allow the tenants to terminate their lease without penalty if the conditions for an emergency transfer are met. The housing provider (property owner) must notify the County subrecipient before bifurcating the lease or providing notification of eviction to the tenant.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Limitations of VAWA (24 CFR 5.2005)

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

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

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

Emergency Transfer Plan (24 CFR 5.2005)

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

Eligibility for Emergency Transfers (24 CFR 5.2005)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Emergency Transfer Request Documentation (24 CFR 5.2007)

To request an emergency transfer, the tenant shall notify and submit a written request for a transfer to the property owner. The property owner shall immediately notify the Macomb County subrecipient of all requests covered by this plan. The property owner and subrecipient will provide reasonable

accommodations to this policy for individuals with disabilities. The tenant's written request for an emergency transfer should include either:

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

Confidentiality (24 CFR 5.2007)

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

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

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

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

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

Emergency Transfer Timing and Availability (24 CFR 5.2005)

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

If a housing provider (property owner) has a safe unit immediately available, the housing provider must allow the tenant to make an internal emergency transfer. An internal emergency transfer is an

emergency relocation of a tenant to another unit where the tenant would not be categorized as a new applicant; the tenant may reside in the new unit without having to undergo an application process. A safe unit is a unit that the tenant requesting the transfer believes is safe. Housing providers must ensure that any additional priority measures that are provided to other types of emergency transfers are also provided to emergency transfers covered under this plan.

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

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

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

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

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

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

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

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

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

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

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

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

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

Record Retention (24 CFR 5.2005)

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

Safety and Security of Tenants

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

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

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

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

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

Attachment #6

Macomb County

Macomb Community Action – Community Development

Notice of Occupancy Rights under the Violence Against Women Act

To all Tenants and Applicants

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

Protections for Applicants

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

Protections for Tenants

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

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

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

Removing the Abuser or Perpetrator from the Household

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

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

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

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

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

Moving to Another Unit

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

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

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

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

OR

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

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

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

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

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

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

- A complete HUD-approved certification form given to you by the housing provider with this notice, that documents an incident of domestic violence, dating violence, sexual assault, or stalking. The form will ask for your name, the date, time, and location of the incident of domestic violence, dating violence, sexual assault, or stalking, and a description of the incident. The certification form provides for including the name of the abuser or perpetrator if the name of the abuser or perpetrator is known and is safe to provide.
- A record of a Federal, State, tribal, territorial, or local law enforcement agency, court, or administrative agency that documents the incident of domestic violence, dating violence, sexual assault, or stalking. Examples of such records include police reports, protective orders, and restraining orders, among others.
- A statement, which you must sign, along with the signature of an employee, agent, or volunteer of a victim service provider, an attorney, a medical professional or a mental health professional (collectively, “professional”) from whom you sought assistance in addressing domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse, and with the professional selected by you attesting under penalty of perjury that he or she believes that the incident or incidents of domestic violence, dating violence, sexual assault, or stalking are grounds for protection.
- Any other statement or evidence that the housing provider has agreed to accept.

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

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

Confidentiality

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

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

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

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

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

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

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

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

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

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

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

Other Laws

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

Non-Compliance with the Requirements of This Notice

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

For Additional Information

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

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

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

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

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

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

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

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

Attachment: Certification form HUD-5382

Attachment #7

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

**U.S. Department of Housing
and Urban Development**

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

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

The requirements you must meet are:

(1) You are a victim of domestic violence, dating violence, sexual assault, or stalking. If your housing provider does not already have documentation that you are a victim of domestic violence, dating violence, sexual assault, or stalking, your housing provider may ask you for such documentation. In response, you may submit Form HUD-5382, or any one of the other types of documentation listed on that Form.

(2) You expressly request the emergency transfer. Submission of this form confirms that you have expressly requested a transfer. Your housing provider may choose to require that you submit this form, or may accept another written or oral request. Please see your housing provider's emergency transfer plan for more details.

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

OR

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

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

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

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

1. Name of victim requesting an emergency transfer: _____

2. Your name (if different from victim's) _____

3. Name(s) of other family member(s) listed on the lease: _____

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

5. Address of location from which the victim seeks to transfer: _____

6. Address or phone number for contacting the victim: _____

7. Name of the accused perpetrator (if known and can be safely disclosed): _____

8. Relationship of the accused perpetrator to the victim: _____

9. Date(s), Time(s) and location(s) of incident(s): _____

10. Is the person requesting the transfer a victim of a sexual assault that occurred in the past 90 days on the premises of the property from which the victim is seeking a transfer? If yes, skip question 11. If no, fill out question 11. _____

11. Describe why the victim believes they are threatened with imminent harm from further violence if they remain in their current unit.

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

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

Signature _____ Signed on (Date) _____

Attachment #8

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

**U.S. Department of Housing
and Urban Development**

OMB Approval No. 2577-0286

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

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

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

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

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

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

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

1. Date the written request is received by victim: _____

2. Name of victim: _____

3. Your name (if different from victim's): _____

4. Name(s) of other family member(s) listed on the lease: _____

5. Residence of victim: _____

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

7. Relationship of the accused perpetrator to the victim: _____

8. Date(s) and times(s) of incident(s) (if known): _____

10. Location of incident(s): _____

In your own words, briefly describe the incident(s): _____ _____ _____ _____
--

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

Signature _____ Signed on (Date) _____

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

Attachment #9

Acknowledgment of Receipt

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

_____ Notice of Occupancy Rights under the Violence Against Women Act

_____ VAWA Self-Certification Form – HUD Form 5382

Documents must be provided during the following timeframe:

At the time the applicant is denied program assistance or admission

At the time the applicant is provided assistance or admission

With any notification of eviction or notification of termination of assistance

At the time of annual recertification or lease renewal

Program Participant Signature

Date

Program Staff Signature

Date

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

Attachment #10

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

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

Program Participant:

Address of Unit being rented:

Name of Apartment Complex if

applicable: _____

Landlord

Name: _____

Landlord Address: _____

Phone: _____

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

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

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

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

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

Security Deposit in the amount of: _____

Monthly Rent payable to the Landlord: _____

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

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

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

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

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

Landlord Signature

Date

Signature of ESG Case Manager

Date

Attachment #11

**LEASE ADDENDUM
VIOLENCE AGAINST WOMEN REAUTHORIZATION ACT OF 2013**

TENANT	LANDLORD	UNIT NO. & ADDRESS
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This lease addendum adds the following paragraphs to the Lease between the above referenced Tenant and Landlord.

Purpose of the Addendum

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

Conflicts with Other Provisions of the Lease

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

Term of the Lease Addendum

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

VAWA Protections

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

Tenant

Landlord

Date

Attachment #12

Macomb County

Macomb Community Action – Community Development

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

History

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

Applicability (24 CFR 5.106)

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

Definitions (24 CFR 5.100)

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

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

Required Practices (24 CFR 5.106)

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

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

Record Keeping Requirements (24 CFR 5.106)

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

Confidentiality & Privacy (24 CFR 5.106)

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

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

Policies and Procedures (24 CFR 5.106)

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

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

Post Admission Accommodations (24 CFR 5.106)

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

Other Federal Regulations (24 CFR 5.106)

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