

Executive Summary

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

1. Introduction

The Oakland County PY 2024 Annual Action Plan is submitted pursuant to U.S. Department of Housing and Urban Development (HUD) Code of Federal Regulations (CFR) (24 Part 91, 2/9/06) as a single submission covering the planning and application aspects of HUD's Community Development Block Grant (CDBG), HOME Investment Partnership Act (HOME) and Emergency Solutions Grant (ESG) formula programs.

The purpose of the PY 2024 Annual Action Plan is to describe activities to be undertaken with HUD programs by Oakland County for the period of July 1, 2024 - June 30, 2025.

2. Summarize the objectives and outcomes identified in the Plan

Oakland County developed the following mission statement and goals based on data analysis conducted and information collected through citizen participation and consultation efforts:

Oakland County Mission: Build equitable communities through:

1. Quality Affordable Housing: Develop and preserve affordable options, increasing housing choice and opportunity.
2. Community Investment: Invest in public services and infrastructure to improve quality of life for vulnerable populations.
3. Fair Housing: Reduce discrimination and promote diverse, inclusive communities.
4. Engagement: Collaborate with residents to deepen community involvement.

3. Evaluation of past performance

The demand for programs funded by CDBG, HOME and ESG remains greater than funds available. A recap of performance from the County's PY 2021 Consolidated Annual Performance and Evaluation Report (CAPER) includes the following accomplishments.

Accomplishments:

- Affordable Housing: Rehabilitated 120 low-income homes (\$2.26 million) and provided minor repair grants (\$442,835).
- Community Investment: Invested in code enforcement, sidewalks, public facilities (removing barriers, senior centers), and public services (domestic violence, senior

services, transportation, childcare, youth services). ESG shelters served 1,312 homeless individuals (\$178,295 for operations, \$32,820 for HMIS). Provided rental assistance and relocation services (\$112,722).

- Fair Housing: Provided fair housing education and counseling (\$149,732), assisting 192 households and referring 1,922 more. Promoted fair housing choice and anti-poverty programs.
- Community Engagement: Hired a Community Engagement Liaison, participated in community boards, and updated resources for online access.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

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.

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

7. Summary

The PY 2024 Annual Action Plan reflects a coordinated effort to determine how federal and leveraged funds will be expended to address Oakland County's community and housing priorities/needs for the PY 2024 Annual Action Plan period of July 1, 2024 - June 30, 2025.

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	OAKLAND COUNTY	HHS/Neighborhood & Housing Development Division	
HOME Administrator	OAKLAND COUNTY	HHS/Neighborhood & Housing Development Division	
ESG Administrator	OAKLAND COUNTY	HHS/Neighborhood & Housing Development Division	

Table 1 – Responsible Agencies

Narrative

The Oakland County Board of Commissioners (BOC) designated the Department of Health and Human Services Oakland County Neighborhood & Housing Development Division as the lead agency responsible for administering its CDBG, HOME and ESG programs including the development of the Con Plan, Annual Action Plan and the Consolidated Annual Performance and Evaluation Report. The Division serves as the lead agency for administration of the CDBG and ESG programs on behalf of 52 participating communities including: the Cities of Auburn Hills, Berkley, Birmingham, Bloomfield Hills, Clarkston, Clawson, Farmington, Ferndale, Hazel Park, Huntington Woods, Keego Harbor, Lathrup Village, Madison Heights, Northville, Novi, Oak Park, Orchard Lake Village, Pleasant Ridge, Rochester, Rochester Hills, South Lyon, Sylvan Lake, Troy, Walled Lake, Wixom, the Townships of Addison, Bloomfield, Brandon, Commerce, Groveland, Highland, Holly, Independence, Lyon, Milford, Oakland, Orion, Oxford, Rose, Royal Oak, Springfield, West Bloomfield, White Lake and the Villages of Beverly Hills, Franklin, Holly, Lake Orion, Leonard, Milford, Ortonville, Oxford and Wolverine Lake.

The Neighborhood & Housing Development Division has a long and successful history in federal program administration, works with various partners and has the capacity to serve as the lead agency for the Oakland County HOME Consortium. The Consortium member communities include Oakland County, Farmington Hills, Pontiac, Royal Oak, and Southfield. All the municipalities are

eligible to receive and administer HUD funds and have established housing and community development programs. All members work in concert and with partners to extend program efficiency, scope and reach. Partnerships include housing developers, public housing commissions, service providers, homeless advocates and for profit and non-profit institutions.

Consolidated Plan Public Contact Information

Written comments are being accepted by mail and email to the attention of:

Khadija Walker-Fobbs, Officer
Oakland County Neighborhood & Housing Development Division
1200 N. Telegraph Rd, 34E, Pontiac MI 48341
or electronically via: nhd@oakgov.com

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

1. Introduction

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)).

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.

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

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

Agency/Group/Organization	Agency/Group/Organization Type	What section of the Plan was addressed by Consultation?	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?
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Table 2 – Agencies, groups, organizations who participated

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

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?

Table 3 – Other local / regional / federal planning efforts

Narrative

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

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

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)

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The mission of the OCNHD is to support equitable and inclusive communities through:

- Preserving and/or developing quality affordable housing
- Supporting capital improvements and public service programs to meet the needs of the communities
- Reducing housing discrimination
- Community engagement

In PY 2024, the OCNHD will use CDBG, HOME and ESG funds as well as recycled paybacks, Program Income, County match, competitive Comprehensive Housing Counseling Grant, SLFRF-ARPA funds, and state housing counseling grants to further the goals and objectives of the PY 2021-2025 Consolidated Plan.

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: \$		

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	5,148,144	1,000,000	0	6,148,144	0	Public facilities, neighborhood and housing improvements and public services benefitting low-income persons throughout Oakland County Urban County participating communities.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	2,812,910	1,500,000	0	4,312,910	0	Acquisition, rehabilitation, new construction of affordable housing including rental development and homebuyer throughout Oakland County HOME Consortium participating communities. Note: PY2024 HOME Match = \$597,744

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	323,720	0	0	323,720	0	Emergency Shelter, Homeless Prevention and Rapid Re-Housing, HMIS and Administration throughout Oakland County Urban County participating communities.

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

CDBG - No Match Requirement

- In-kind County level administrative functions: human resources, marketing, fiscal services, purchasing, auditing, corporation counsel, record retention and mail room support services
- Infrastructure and public facility projects supported with funds from participating communities
- Revolving Loan Fund (RLF) generated from paybacks on CDBG funded housing rehabilitation loans supplement the HIP. During PY 2024

Consolidated Plan OAKLAND COUNTY 221 OMB Control No: 2506-0117 (exp. 09/30/2022) the County will recycle approximately \$1,000,000 in CDBG RLF into the HIP for the rehabilitation of approximately 40 single-family homes of LI residents.

- Emergency, youth, senior and other public services designed to meet special needs of LI residents are expanded through leverage from various public service agencies.

HOME - 25% Match Requirement

- Oakland County ensures that all housing projects receive \$1 of non-federal match for every \$4 of HOME funds expended, in accordance with federal guideline (s.92.218).
- The HOME program requires a 25% match on all non-administrative activities. In PY 2024, \$597,744 in general funds will serve as match for County level housing rehabilitation, rental development/preservation and homebuyer assistance activities.
- CHDO's leverage HOME funds with state and private resources to develop affordable housing
- OCNHD leveraged \$1,000,000 in HOME funding through a Notice of Funding Availability (NOFA) that resulted in the development of an approximately \$21,500,000 rental housing development. The 53-unit affordable housing community is under construction and will be completed in 2025.
- PI generated from paybacks on HOME funded housing rehabilitation loans supplement the HIP. During PY 2024, the Division estimates approximately \$1,500,000 in PI will enable the rehabilitation of approximately 60 single-family homes of LI residents and expand affordable housing development.

ESG - 100% Match Requirement

- Oakland County passes on the match requirements to its vendors
- Cash contributions for allowable costs including staff salaries/fringe benefits
- Noncash contributions

- Volunteer services are matched at the current minimum wage salary unless the recipient can verify a higher rate of pay for current employees performing similar work
- Real property, equipment, goods or services that if the recipient had to pay for them with grant funds, the payments would have been indirect costs
- The value of donated goods and services such as clothing, food, diapers, haircuts, etc. The value placed should be consistent with Office of Management and Budget Circulars.

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

Discussion

A variety of non-federal resources will supplement the CDBG, HOME and ESG funds. Non-federal resources available fall into three general categories - funds required to match the HOME and ESG programs as required by regulation, non-federal funds used by local communities to supplement CDBG allocations for larger scale projects, and the Oakland County Housing Trust Fund (OCHTF). Oakland County uses PI generated from paybacks on CDBG and HOME funded housing rehabilitation loans to expand the HIP and rental gap development/preservation program. The OCHTF provides gap funding for rental and for-sale mixed income housing throughout the County. In general, the land for OCHTF developments is identified and provided by its development partners. Groups and individuals are encouraged to establish non-profits complying with HUD requirements to permit them to receive funds under the HOME program, as well as funds under Section 811, Supportive Housing for Persons with Disabilities.

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	Affordable Housing	2021	2025	Affordable Housing CDBG Admin/HIP Direct Project Costs/RLF and HOME Admin/Project Delivery Costs	Oakland County HOME Consortium Oakland County	CDBG ADMINISTRATION & PLANNING CDBG HOUSING/MHR CDBG HOUSING/HSG REHAB CDBG HOUSING/RLF (EST) HESG GENERAL PROGRAM ADMINISTRATION HOME/HOMEBUYER HOME/HOUSING REHAB HOME/RENTAL DEVELOPMENT HOME/RENTAL ASSISTANCE		Rental units constructed: 53 Household Housing Unit Rental units rehabilitated: 25 Household Housing Unit Homeowner Housing Rehabilitated: 300 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Facilities and Services	2021	2025	Non-Housing Community Development CDBG Administration & Planning	Oakland County HOME Consortium Oakland County	CDBG ADMINISTRATION & PLANNING CDBG CLEARANCE & DEMO CDBG PF & INFRASTRUCTURE CDBG PS/HSG COUNSELING CDBG PS/BATTERED & ABUSED CDBG PS/PUBLIC SERVICES HESG HOMELESSNESS HOME GENERAL PROGRAM ADMINISTRATION		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 300000 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 2000 Households Assisted Homeless Person Overnight Shelter: 280 Persons Assisted Homelessness Prevention: 100 Persons Assisted Buildings Demolished: 25 Buildings Housing Code Enforcement/Foreclosed Property Care: 36000 Household Housing Unit Other: 2 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Discrimination	2021	2025	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development CDBG Administration & Planning	Oakland County HOME Consortium Oakland County	CDBG ADMINISTRATION & PLANNING CDBG CODE ENFORCEMENT CDBG HOUSING/MHR CDBG HOUSING/MHMHR CDBG HOUSING/HSG REHAB CDBG HOUSING/RLF (EST) CDBG PF & INFRASTRUCTURE CDBG PS/HSG COUNSELING CDBG PS/BATTERED & ABUSED CDBG PS/PUBLIC SERVICES HESG GENERAL PROGRAM ADMINISTRATION HESG HOMELESSNESS HOME GENERAL PROGRAM ADMINISTRATION HOME/HOMEBUYER HOME/HOUSING REHAB HOME/RENTAL DEVELOPMENT HOME/RENTAL ASSISTANCE		Public service activities other than Low/Moderate Income Housing Benefit: 700 Persons Assisted
OMB Control No: 2506-0117 (exp. 09/30/2021)					Annual Action Plan 2024		17	

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Community Engagement	2021	2025	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development CDBG Administration & Planning	Oakland County HOME Consortium Oakland County	CDBG ADMINISTRATION & PLANNING CDBG HOUSING/MHR CDBG HOUSING/MHMR CDBG HOUSING/HSG REHAB CDBG PS/HSG COUNSELING CDBG PS/BATTERED & ABUSED CDBG PS/PUBLIC SERVICES HOME/HOUSING REHAB HOME/RENTAL ASSISTANCE		Public service activities for Low/Moderate Income Housing Benefit: 50 Households Assisted Direct Financial Assistance to Homebuyers: 10 Households Assisted Homelessness Prevention: 20 Persons Assisted Housing Code Enforcement/Foreclosed Property Care: 3 Household Housing Unit

Table 3 – Goals Summary

Goal Descriptions

1	Goal Name	Affordable Housing
	Goal Description	

2	Goal Name	Facilities and Services
	Goal Description	
3	Goal Name	Discrimination
	Goal Description	
4	Goal Name	Community Engagement
	Goal Description	

AP-35 Projects - 91.420, 91.220(d)

Introduction

How the CDBG Formula Works: After setting aside funds for special purposes such as technical assistance, projects specified by Congress and the Indian CDBG program, the annual appropriation for CDBG formula funding is split so that 70% is allocated among eligible metropolitan cities and counties (referred to as entitlement communities) and 30% among the states to serve non-entitled communities.

HUD uses two basic formulas, known as Formula A and Formula B, to allocate CDBG funds to entitlement communities. A similar dual formula system allocates funds to states.

For entitlements, Formula A allocates funds a community based on its metropolitan shares of: (1) population weighted at 25%; (2) poverty weighted at 50%; and (3) overcrowding, weighted at 25%, times appropriations.

Formula B allocates funds to a community based CDBG formula targeting to community development need on: (1) its share of growth lag, weighted at 20%; and its metropolitan shares of (2) poverty, weighted at 30% and (3) pre-1940 housing weighted at 50%, times appropriation.

HUD calculates the amount for each entitlement jurisdiction under each formula. Jurisdictions are then assigned the larger of the two grants. That is, if a jurisdiction gets more funds under Formula A than Formula B, the grant amount is based on Formula A. With this dual system, the total amount assigned to CDBG grantees has always exceeded the total amount available through appropriation. To bring the total grant amount allocated to entitlement communities within the appropriated amount, HUD uses a pro rata reduction (calculated as a percentage).

#	Project Name
1	CDBG Administration
2	CDBG Housing Rehabilitation/Revolving Loan Fund Estimate

Table 4 – Project Information

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

AP-38 Project Summary
Project Summary Information

1	Project Name	CDBG Administration
	Target Area	Oakland County HOME Consortium Oakland County
	Goals Supported	Affordable Housing Facilities and Services Discrimination Community Engagement
	Needs Addressed	CDBG ADMINISTRATION & PLANNING
	Funding	:
	Description	Administration of the CDBG program including management, public information and fair housing activities.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Not Applicable
	Location Description	Oakland County Neighborhood & Housing Development Division 1200 N Telegraph, 34E, Pontiac, MI 48341
	Planned Activities	General Program Administration
2	Project Name	CDBG Housing Rehabilitation/Revolving Loan Fund Estimate
	Target Area	Oakland County HOME Consortium Oakland County
	Goals Supported	Affordable Housing Discrimination
	Needs Addressed	CDBG HOUSING/HSG REHAB CDBG HOUSING/RLF (EST)
	Funding	:
	Description	Contract work of the County's Home Improvement Program which is available to income qualified homeowners in participating communities. Estimated loan payments to fund future Home Improvement Program loans which are available to income qualified homeowners in participating communities
	Target Date	

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Oakland County Neighborhood & Housing Development Division 1200 N. Telegraph Rd, 34E, Pontiac, MI 48341
	Planned Activities	

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

Oakland County Neighborhood & Housing Development administers HUD CPD grant programs through the authorization of the Oakland County Board of Commissioners. Current programs consist of CDBG, HOME and ESG. Oakland County targets these program funds towards low-income areas, individuals, and households as prioritized by HUD, based on Oakland County demographics and U.S. Census Bureau estimates. In addition to these programs, the Division continues to administer Neighborhood Stabilization Programs (NSP).

The County contains 61 units of general local government, including twenty-one townships, ten villages and thirty cities. The following fifty-two (85[Sf1] %) of Oakland County communities participate in the County's "Urban County" CDBG housing and community development programs: **Cities** - Auburn Hills, Berkley, Birmingham, Bloomfield Hills, Clarkston, Clawson, Farmington, Ferndale, Hazel Park, Huntington Woods, Keego Harbor, Lathrup Village, Madison Heights, Northville, Novi, Oak Park, Orchard Lake Village, Pleasant Ridge, Pontiac, Rochester, Rochester Hills, South Lyon, Sylvan Lake, Troy, Walled Lake, Wixom **Townships** - Addison, Bloomfield, Brandon, Commerce, Groveland, Highland, Holly, Independence, Lyon, Milford, Oakland, Orion, Oxford, Rose, Royal Oak, Springfield, West Bloomfield, White Lake **Villages** - Beverly Hills, Franklin, Holly, Lake Orion, Leonard, Milford, Ortonville, Oxford and Wolverine Lake.

Farmington Hills, Royal Oak, Pontiac, Southfield and Waterford Township are HUD entitlement communities. These communities with over 50,000 residents are "entitled" to receive HUD funds and have chosen to administer their own CDBG programs. The City of Lake Angelus, Novi Township, Southfield Township and the Village of Bingham Farms do not receive HUD funds.

Geographic Distribution

Target Area	Percentage of Funds
Oakland County HOME Consortium	33
Oakland County	67

Table 5 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Oakland County CDBG - CDBG funds are distributed based on an allocation method approved by the BOC. The method deducts administrative costs up to 20% from the grant and apportions 1/3 of the grant balance to the Home Improvement Program (HIP) and 2/3 of the balance to 53 participating communities (PC's). The allocation of funds to PC's follows the federal CDBG "option one" method from the Housing and Community Development Act, as amended [42 USC 5306(b) (2)]. The County formula is:

$(P+3L)/4$ P= ratio of a PC's population to population in all PC's L= ratio of community's low-income (LI) population to that of all PC's. The LI ratio is factored 3 times and then multiplied by the total amount of funds available each year. All PC's falling below \$7,000 receive \$7,000 as a minimum award.

Oakland County HOME - Oakland County invests HOME and CDBG funds in the HIP which operates throughout 57 communities on a 1st-come 1st-serve basis targeting applicants who qualify as LI homeowners of single-family (SF) owner-occupied units in PC's. CDBG funds are also used to operate the HIP for owner occupants of attached SF rental (2-4 units) in Urban County PC's. Qualified Community Housing Development Organizations (CHDOs) may also receive HOME to construct or rehabilitate affordable SF (1- 4 units) and multifamily rental housing in 57 communities. This investment targets renters at or below 60% of area median income. CHDOs will be able to increase the supply of rental units by Acquisition/Rehabilitation or New Construction. A portion of HOME program income (PI) will be designated to CHDOs to fund homeownership opportunities for persons prioritized as LI, 1st time homebuyers in Consortium communities. Homebuyer assistance is provided to make homeownership affordable. HOME funds will also be reserved to provide gap financing for developers to build/rehabilitate affordable rental housing.

Oakland County ESG – Emergency Shelter: distributed among eligible shelter providers that complete the application process. The allocation to each agency would be based on the individual agency's total number of persons served each day/night for the period of 7/1 - 6/30 of the previous year as a % of total served. The Shelter Operations portion of the grant shall be no more than 60% of the grant and never more than the 2010 level. Homeless Management Information System (HMIS) - The HMIS lead agency will receive up to 7.5% to ensure that shelter personnel are trained, and that reported data is complete and correct. Administration - The County retains 7.5% for administration, planning, implementation, reimbursement and reporting. Housing Relocation and Stabilization Services/Rental Assistance - The balance of the grant will be allocated for Homeless Prevention and/or Rapid Re-Housing programs. A maximum of 2 agencies will be funded through an RFP based on a point criteria: (Capacity/Experience 40), Outreach Plan (25) HMIS (15), prior experience with use of Mainstream Resources/Leveraging (15) and CoC participation (5).

Discussion

Federal CDBG Formula - After setting aside funds for technical assistance, projects specified by Congress and the Indian CDBG program, the annual appropriation for CDBG is split, 70% allocated among eligible metropolitan cities and counties (referred to as entitlement communities) and 30% among states to serve non-entitled areas. HUD uses 2 formulas, A and B, to allocate CDBG to entitlements. A similar dual formula allocates funds to states. For entitlements, Formula A allocates funds to a community based on its metropolitan share of: (1) population weighted 25%; (2) poverty weighted 50%; and (3) overcrowding, weighted 25%, times appropriations. Formula B allocates funds based on the metropolitan share of: (1) growth lag, weighted 20%; (2) poverty, weighted 30% and (3) pre-1940 housing weighted 50%, times appropriation. HUD calculates the amount for each entitlement under each formula. Jurisdictions are then assigned the larger of the two. That is, if a jurisdiction gets more

funds under A than B, the grant amount is based on A.

2011-2015 Low/Moderate Income Summary Data (LMISD) - HUD announced that new LMISD will go into effect on 4/1/19. These data are used to qualify all new area-benefit activities as of 4/1/19. HUD released Community Planning and Development Notice 19-02 which provides guidance on geographic datasets used for compliance purposes with CDBG grant requirements.

The Notice:

- Announces the publication of the LMISD based on the American Community Survey (ACS) 2011- 2015 5-year estimates (2015 ACS). These data will replace the prior LMISD based on the ACS 2006-2010 5-year estimates (2010 ACS) for the purposes of demonstrating compliance with the CDBG National Objective of providing benefit to low- and moderate-income persons on an area basis (“Area Benefit” or LMA) and other purposes discussed this Notice;
- Announces an effective date of 4/1/19 for use of the 2015 ACS LMISD to qualify LMA activities; and, provides a transition policy for circumstances when prior 2010 ACS LMISD may continue to be used;
- Explains the geographic format of these data and how to use the LMISD to demonstrate compliance for LMA activities;
- Announces the publication of margin of error (MOE) data for all geographies in the LMISD, including all census places and block groups, and provides instructions for use. Additionally, this Notice describes guidance regarding the confidence interval and acceptable MOE for local income surveys, based on the LMISD MOE;
- Announces that HUD will set a 5-year publication schedule for other geographic data used for reporting race/ethnicity, disability, and age of beneficiaries, as well as poverty data used to qualify certain activities for assistance; and,
- Provides instruction for reporting LMA activities in the grantee reporting systems for the various programs.

CDBG - Eighty percent of all CDBG funds are allocated to benefit fifty-three participating communities.

HOME - All HOME funded activities are available in the 57 HOME Consortium communities.

ESG - Emergency Solutions Grant typically funds 6 shelters. HAVEN, Hope Hospitality and Lighthouse of Michigan’s PATH program are centrally located in Pontiac. Community Ground Sanctuary is in the southeastern community of Royal Oak. Welcome Inn Day Center is in the southcentral community of Southfield. South Oakland Shelter is a rotating shelter with locations throughout the County. The ESG funded HPRP is available countywide.

Affordable Housing

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

Introduction

Oakland County will address the affordable housing need by supporting CHDO homebuyer programs and rental development opportunities, supporting homeless prevention and rapid re-housing services, rehabilitation of existing units through the Home Improvement Program, gap financing of rental multi-unit preservation/development, and housing counseling services.

One Year Goals for the Number of Households to be Supported	
Homeless	1,500
Non-Homeless	388
Special-Needs	173
Total	2,061

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	150
The Production of New Units	53
Rehab of Existing Units	167
Acquisition of Existing Units	3
Total	373

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

Discussion

The One Year Goal for Rental Assistance is provided through the Oakland County ESG program homeless prevention and rapid re-housing services component (150 units).

The One Year Goal for Rehab of Existing Units is provided through the Oakland County Home Improvement Program (150 units).

The One Year Goal to produce 53 new units and to acquire 3 units for renovation will be accomplished through the CHDO activities and the Rental Development/Preservation Gap Financing program.

The Housing Counseling Unit will assist approximately 350 households to acquire and maintain affordable housing. In addition, the Unit will provide approximately 2000 households with information and referrals on housing related issues.

The above numbers are goals for PY 2024. The actual number may be higher or lower.

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

Introduction

Oakland County does not administer public housing. Public Housing Commissions in Ferndale, Pontiac, and Royal Oak Township have public housing units.

Ferndale, Pontiac and Southfield Housing Commissions offer Housing Choice Vouchers (HCV). In addition, as of September 2019 the Michigan State Housing Development Authority (MSHDA) has allocated just under 1,615 HCV for Oakland County.

Plymouth Housing Commission and Detroit Housing Commission and other commissions in the region, while not located in Oakland County, offer a significant number of HCVs. Many HCV holders choose to reside in Oakland County.

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

The Ferndale, Pontiac, and Royal Oak Township Public Housing Commissions (PHCs) are not under Oakland County control. The County invited the PHCs to participate in the formulation of the Analysis of Impediments to Fair Housing Choice. One PHC participated.

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

Oakland County housing counselors will meet with public housing residents and/or housing choice voucher holders to explore the potential for future homeownership including converting a rental voucher to a homeownership voucher. The housing counseling unit provides referrals to each local PHC. The status of each PHC waiting list is provided to the Neighborhood & Housing Development Division through its Alliance membership.

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

A troubled PHA is one that has a Public Housing Assessment System (PHAS) score of 59% or lower.

Pontiac Housing Commission is listed as "Troubled" in the most recent listing released October 2023.
https://www.hud.gov/program_offices/public_indian_housing/reac/products/prodphasintrule

Oakland County Neighborhood & Housing Development Division does not administer a public housing commission. The plan for Pontiac Housing Commission to remove its "Troubled" designation is currently unknown.

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

Introduction

The NHD has administered the Emergency Solutions Grant (ESG) program since 1987 and is a member of the Alliance for Housing of Oakland County, the Continuum of Care. The Alliance is a 501(c) (3), nonprofit organization working toward a common goal to end homelessness and increase affordable housing opportunities. The Alliance is made up of many organizations from the private and public sector including emergency shelters, warming centers, providers of health services including mental health and developmental disability services, affordable housing developers, supportive housing programs, municipalities, government agencies, faith-based service providers and more. The Alliance competes nationally for funding including annual applications for HUD Continuum of Care Homeless Assistance Grants.

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

Continuum of Care's efforts to reduce the number of individuals and families who become homeless are driven by its Plan to End Homelessness. This plan was written in 2006 and has been updated several times. The Alliance for Housing (CoC) has developed a strategic Plan in addition to the original plan. Most of the original goals have been made. Oakland County established a "Blueprint to End Homelessness" during 2021 to seek new goals, ensure equity in programming, increase alternative funding sources and to become a unified funding agency under the HEARTH Act. Under the current plan Goal 3 states: Increase and strengthen the amount of prevention, both emergency and system-wide and Rapid Re-Housing Services. Strategies under this goal to reduce homelessness include addressing impediments to fair housing choice as identified in the Oakland County Con Plan Jurisdictions' Analyses of Impediments. All strategies to achieve this goal are coordinated with ESG recipients. Oakland County Con Plan jurisdictions address homelessness prevention by contributing to the achievement of the goals through emergency service dollars.

The Continuum of Care's efforts focus on relationship building and outreach. Physical outreach is targeted to emergency shelters, warming centers and the streets. Brochures and flyers are distributed at shelters, human services agencies, schools, WIC providers, libraries and other areas frequented by at risk families. Outreach includes press releases, the Continuum of Care website and newsletters. Homeless Student Liaisons provide a means for reaching families through the schools. Program staff works to build trust; many unsheltered families fear their children will be taken from them if discovered. Contact focuses on introducing services to engage, rather than frighten or alienate and works to quickly identify housing. When the family accepts the system of care, they are likely to stay engaged, improving the chance of long-term success.

The Continuum of Care has specific outreach procedures in place to identify and engage homeless individuals and families. Projects for Assistance in Transition from Homelessness (PATH) teams canvass community shelters and the streets to engage homeless in obtaining services. Unsheltered homeless are the most difficult to engage and least likely to seek assistance. By meeting homeless individuals and families where they are, team members gain trust and make connections to resources and services. The Continuum of Care also hosts annual Community Resource Day events to introduce and immediate access to resources. Housing and services providers serve persons with disabilities and ensure accessibility through a variety of accommodations.

Additionally, Continuum of Care providers who operate outreach services all have Language Access Plans (LAP) in place to aid with persons with limited English proficiency or other language barriers that may prevent access to services. Interpretation services are provided by organizations such as ACCESS for Arabic translations and deaf interpreters accessed through the State of Michigan Division on Deaf, DeafBlind and Hard of Hearing. Oakland County has a contract with Telelanguage which provides more than 150 language services including American Sign Language for any county administered program.

Addressing the emergency shelter and transitional housing needs of homeless persons

Recipient agencies conduct an initial evaluation to determine each individual or family's eligibility for ESG assistance and the amount and types of assistance the household needs to regain stability in permanent housing. The evaluations are conducted in accordance with the centralized assessment requirements of the Oakland County Continuum of Care. After initial evaluation, a housing plan is developed, and a participant must meet with his or her caseworker as prescribed under the plan. Unless prohibited under the Violence Against Women Act, as amended or the Family Violence Prevention and Services Act, the recipient will be connected to appropriate supportive services including assistance in obtaining permanent housing, mental health treatment, counseling and other services essential for achieving independent living. They will also be linked to federal, state, local and private assistance available to assist with obtaining housing stability including Medicaid, food assistance, WIC, unemployment benefits, SSI, SSDI, Veteran's benefits, medical assistance, legal aid, employment assistance and other locally available assistance programs. A plan will be developed to assist the program participant to retain permanent housing after the assistance ends, considering all relevant considerations such as the program participants current or expected income and expenses, other public or private assistance for which the program participant will be eligible and likely to receive, and the affordability of available housing in the area. Each participant will be linked to available PSH programs or the local Housing Choice Voucher (HCV) Programs, PHA and project based rental assistance when the waiting lists are open.

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

Oakland County ESG funds are used in part to fund a Homeless Prevention and/or Rapid Re-Housing (HPRRH) program. South Oakland Shelter (SOS)/Lighthouse of Oakland County and Community Housing Network administer HPRRH contracts and provided a combination of rental assistance, rental fees, utility assistance and case management to homeless and at risk of homeless households. SOS offers a twelve month follow up program of in-home case management that assisted 90% of HPRRH clients to maintain housing after one year. With ESG-CV funds, the waivers were used to extend the amount of time a recipient can receive assistance to prevent further homelessness during the pandemic.

In the Continuum of Care geographic area, the average length of time families are homeless before entering a program is 1-3 months. The average length of time individuals are homeless before entering shelter is 1 week or less and 1-3 months for individuals entering transitional housing or permanent housing programs. As part of the intake assessment in HMIS, the length of homeless episodes is a universal data element and is routinely completed.

This data is collected and shared with the Systems Implementation and Coordination Committee, who is charged with developing plans to increase the effectiveness of funded and non-funded programs serving homeless populations. HMIS is analyzed to create plans to specifically reduce the length of time individuals and families remain homeless. Data from both Continuum of Care and ESG funded projects as well as non-HUD funded projects is considered with equal weight in the planning process. Planning includes strengthening existing program capacity and efficient connections to community programs including Housing Choice Voucher waitlists, mainstream services and other available programs.

The Continuum of Care is actively working to reduce returns to homelessness of individuals and families in its geographic area by tracking returns to homelessness and stays in permanent housing using HMIS. HMIS is used to generate and share quarterly reports which include data on episodes of homelessness experienced by participants who have exited rapid re-housing, transitional housing, and/or PSH. These reports are provided to the Board and the Project Monitoring and Performance Outcomes committee. Reports help to inform the overall technical assistance offered and ongoing strategic planning measurement and adjustments. Program specific technical assistance includes an examination of exit procedures as well as follow-up care procedures and accessibility.

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 following information is excerpted from the Neighborhood & Housing Development ESG Homeless Certification.

Persons living on the street - Supportive services include outreach, food, health care and clothing to persons who reside on the streets. In most cases, it is not feasible to require the homeless persons to document that they reside on the street. It is enough for the agency's staff to certify that the persons served, indeed, reside on the street. The outreach or service worker should sign and date a general certification verifying that services are going to homeless persons and indicating where the persons reside. **Persons coming from living on the street** - The agency should obtain information to indicate that a participant is coming from the street. This may include names of other organizations or outreach workers who have assisted them in the recent past who might provide documentation. If you are unable to verify that the person is coming from residing on the street, have the participant prepare or you prepare a written statement about the participant's previous living place and have the participant sign the statement and date it. Merely obtaining a self-certification is not adequate. If the participant was referred by an outreach worker or social service agency, you must obtain written verification from the referring organization regarding where the person has been residing. This verification should be on agency letterhead, signed and dated.

Persons coming from an emergency shelter for homeless persons - The agency should have written verification from shelter staff that the participant has been residing at the emergency shelter for homeless persons. The verification should be on agency letterhead, signed, and dated.

Persons coming from transitional housing for homeless persons - The agency should have written verification from the transitional housing facility staff that the participant has been residing in the transitional housing. The verification should be on agency letterhead, signed and dated. The agency should also have written verification that the participant was living on the streets or in an emergency shelter prior to living in the transitional housing facility (see above for required documentation) or was discharged from an institution or evicted prior to living in the transitional housing facility and would have been homeless if not for the transitional housing (see below for required documentation).

Discussion

Persons from a short-term stay (up to 30 consecutive days) in an institution- The agency should have written verification from the institution's staff that the participant has been residing in the institution for 30 days or less. The verification should be signed and dated. The agency also should have written verification that the participant was residing on the street or in an emergency shelter prior to the short term stay in the institution. See above for guidance.

Persons being evicted from a private dwelling - The agency must have evidence of the formal eviction proceedings indicating that the participant was being evicted within the week before receiving rental assistance. If the person's family is evicting him/her, a statement describing the reason for eviction should be signed by the family member and dated. In other cases where there is no formal eviction

process, persons are considered evicted when they are forced out of the dwelling unit by circumstances beyond their control. In those instances, the agency must obtain a signed and dated statement from the participant describing the situation. The agency must make efforts to confirm that these circumstances are true and have written verification describing the efforts and attesting to their validity. The verification should be signed and dated. The agency must also have information on the income of the participant and what efforts were made to obtain housing and why, without the rental assistance, the participant would be living on the street or in an emergency shelter.

Persons being discharged from an institution - The agency must have evidence from the institution's staff that the participant was being discharged within the week before receiving rental assistance. The agency must also have information on the income of the participant and what efforts were made to obtain housing and why, without the rental assistance, the participant would be living on the street or in an emergency shelter. Staff workers will reach out to those who are incarcerated in the Oakland County Jail and have identify as homeless to ensure an adequate discharge plan.

Fleeing domestic violence - The agency must have written verification from the participant that he/she is fleeing a domestic violence situation. If the participant is unable to prepare the verification, prepare a written statement about the participant's previous living situation and have the participant sign the statement and date it.

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

Introduction

Oakland County will continue to work to foster equitable and inclusive communities by committing to creating and preserving affordable housing and eliminate barriers to affordable housing and residential investment. This includes the continued administration of its various housing programs, the identification of non-federal funding sources and partnerships, and the ongoing community education of housing issues.

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

Michigan is a home rule state. Oakland County has no authority over public policies including land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations and policies affecting the return on residential investment. During PY 2020, Oakland County completed a new Analysis of Impediments to Fair Housing Choice (AI) effective July 1, 2021. The AI identifies barriers to affordable housing to be addressed in a Fair Housing Plan which that informed the County's Five-Year Consolidated Plan (PY 2021 - PY 2025).

Discussion

Although Oakland County, cannot directly affect any of those barriers it continues to look for ways to collaborate, educate and convene local municipalities on understanding the effects of policies on the creation of affordable housing and the ability of individuals to continue to benefit from residential investment. Oakland County also commits to keeping HUD certified counselors on staff to educate residents on their rights and choices. Oakland County also commits to working with local social service agencies, the citizen advisory committee, board of commissioners and other advocacy organizations to look for new ways to address public policies that either directly or adversely create barriers to creating, obtaining or accessing affordable housing.

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

Introduction

Consolidated Plan regulations require an analysis of Census data to determine if there are any instances of housing problems being more severe for an ethnic or racial group than for the County. Two types of priority problems constitute worst case needs for federal housing assistance

Actions planned to address obstacles to meeting underserved needs

Underserved Need: Severe rent burden

Definition: A renter paying more than one-half of his or her income for total tenant payment (rent and utilities).

Actions Planned to Address:

- CDBG funded Subsistence Services
- Development of new affordable housing units
- ESG funded Homeless Prevention and Rapid Re-housing services
- No-cost housing counseling
- Affordable housing referrals
- Referrals to utility assistance providers

Underserved Need: Severely inadequate housing

Definition: A unit is generally considered severely inadequate if any of the following criteria apply:

- No hot and cold running water.
- No bathtub or shower.
- No flush toilet.
- Shared plumbing facilities.
- Cold for 24 hours or more and more than two breakdowns of heating equipment have occurred that lasted longer than 6 hours.

- Electricity not used.
- Exposed wiring, not every room has working electrical plugs, and fuses have blown more than twice.

Actions Planned to Address[SF1] :

- CDBG/HOME funded Home Improvement Program
- CDBG funded Minor Home Repair
- CDBG funded Mobile Home Repair
- HOME, CDBG, Housing Trust Fund rental rehabilitation programs
- Referrals for weatherization assistance
- No-cost housing counseling

Actions planned to foster and maintain affordable housing

Actions planned to reduce lead-based paint hazards

Actions planned to reduce the number of poverty-level families

The institutional structure, through which this AAP will be implemented, includes agencies of County government, local communities, non-profit organizations, and private industry. Division staff conducts CDBG, HOME and ESG workshops to keep partners current on new developments and policies. These workshops provide subrecipients, CHDOS and developers with opportunities to ask questions, share ideas and provide feedback. Additional technical consultations between Division staff and local agencies regularly occur as necessary to provide technical assistance. Pre-bid and pre-construction meetings are held prior to CDBG and HOME assisted projects providing education and technical assistance to ensure that affirmative marketing, procurement, Section 3, U.S. Department of Labor and Davis-Bacon Act requirements are met. The Division will continue efforts to update marketing materials to educate and provide awareness. Technical assistance provided by the Division focuses on defining program eligibility requirements; establishing and undertaking correct program processes; measuring performance; furthering collaboration between partners and building partner capacity.

Actions planned to develop institutional structure

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

Discussion

The Division will continue to provide gap financing for rental and for-sale affordable housing through the OCHTF as well as have a finer focus on the health and safety home improvements for owner occupied rehabilitation.

Program Specific Requirements

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

Introduction

CDBG Revolving Loan Funds are used to support Home Improvement Program projects in accordance with CDBG & HUD guidelines.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	0.00%

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

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

Other forms of investment include private and other public investments. HOME funds will not be invested in a loan guarantee as an eligible activity as indicated in 24 CFR 92.205(b).

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 Oakland County Neighborhood & Housing Development Division has comprehensive program guidelines which provide for the recapture of HOME funds in compliance with program requirements 24 CFR 92.254(a). Under the recapture provision, the HOME investment subject to recapture is the HOME assistance that enables the homebuyer to afford the dwelling unit. This homebuyer assistance is a subsidy (\$1,000.00 minimum) that makes the home affordable to a low-income homebuyer. The County's home buyer assistance is a deferred payment loan with 0% interest. The Division secures its interest in the property with a mortgage and note. One hundred percent of the HOME investment is recaptured upon conversion of property use and/or ownership unless, due to foreclosure, there are not enough proceeds to pay the full amount of the loan. The County will accept the balance of the net proceeds as payment in full, the debt will be extinguished and the affordability period ends. Recaptured funds must be used to carry out HOME eligible activities.

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:

The HOME Program stipulates an affordability period on projects assisted with HOME funds to ensure that HOME investments yield affordable housing over the long term. Section 215 of the National Affordable Housing Act outlines the term “affordable housing”. To qualify as affordable, all rental and homeownership units constructed or rehabilitated with HOME funds must adhere to the regulation. It is the responsibility of each HOME participating jurisdiction to report to HUD the number of affordable units completed on an annual basis. Although the CDBG program does not require the qualification of units as “affordable” following the HOME Section 215 regulations, it is useful to keep track of affordable units rehabilitated with CDBG funds. Oakland County meets Section 215 requirements as:

- HOME assisted units are available for households at 80% of area median income (AMI) or below
- Initial purchase price of units does not exceed HUD Homeownership Value Limits
- The units serve as the owner’s principal residence
- All newly constructed housing meets energy efficiency standards
- Recapture provisions allow the County to provide assistance as a deferred loan secured by mortgage and note (0% interest)
- The loan becomes due and payable when the homeowner vacates, sells, transfers, or assigns any legal or equitable interest in the property except where prohibited by law. Upon the deaths of the loan recipients, it is the responsibility of the estate or heirs to repay the loan when the estate is settled.

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 Oakland County HOME Consortium does not intend to refinance existing debt secured by multifamily housing rehabilitated with HOME funds

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).
6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will

narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

Emergency Solutions Grant (ESG)

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

For the Homeless Assistance and Rapid Re-housing portion of the grant, recipient agencies will conduct an initial evaluation to determine each individual or family's eligibility for ESG assistance and the amount and types of assistance the household needs to regain stability in permanent housing. The evaluations will be conducted in accordance with the centralized assessment requirements of the Oakland County Continuum of Care. Eligibility requirements for the Rapid ReHousing and/or prevention components of the program include:

- The program participant must meet the criteria under the Federal homeless definition as amended under the HEARTH act. A homeless certification form is required.
- The household income must be less than 30% of AMI. Annual income will be calculated using the standards for calculating income under HOME and Section 8 income guidelines.
- The household cannot have assets more than \$1,000 for an individual or \$2,000 for a family
- The program participant lacks enough resources and support networks necessary to retain housing without ESG Assistance, but for this assistance they would be homeless.

After initial evaluation, a housing plan will be developed, and a participant must meet with his or her caseworker as prescribed under the plan. Unless prohibited under the Violence Against Women Act, as amended or the Family Violence Prevention and Services Act, the recipient will be connected to appropriate supportive services including assistance in obtaining permanent housing, mental health treatment, counseling and other services essential for achieving independent living. They will also be linked to federal, state, local and private assistance available to assist with obtaining housing stability including Medicaid, food assistance, WIC, unemployment benefits, SSI, SSDI, Veteran's benefits, medical assistance, legal aid, employment assistance and other locally available assistance programs. A plan will be developed to assist the program participant to retain permanent housing after the assistance ends, considering all relevant considerations such as the program participants current or expected income and expenses, other public or private assistance for which the program

participant will be eligible and likely to receive and the affordability of available housing in the area. Each participant will be linked to available PSH programs or the local HCV, Section 8 Voucher Programs, Public Housing Authorities and project based rental assistance when the waiting lists are open.

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

Oakland County agencies practice a no wrong door approach. Coordination among emergency shelter providers, essential services providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers and mainstream services and housing providers will be done through HMIS sharing, the centralized assessment form, the local Homeless Assistance and Recovery Agency (HARA) and the Community Inter-Agency Service Team (CIST). All ESG recipients will be required to be an active member of the Continuum of Care and attend bimonthly CIST meetings. At these meetings, case managers can share information and resources and assist each other with resources for clients. MSHDA and Michigan DHHS with the full support from the Michigan Coalition Against Homelessness requires the use of a single assessment tool for people experiencing homelessness. This tool, known as the Vulnerability Index - Service Prioritization Decision Assistance Tool (VI-SPDAT) will provide HARAs and other housing agencies a standardized, evidence-informed assessment process that prioritizes vulnerability. Michigan's Campaign to End Homelessness is committed to Housing First and has identified VI-SPDAT as the tool that will be implemented in every community so that our state moves forward in ending homelessness while supporting HEARTH Act regulations. Youth programs are exempt and use their own similar statewide assessment tool. Oakland County providers meet once a month and have calls weekly to discuss VI-SPDAT scores and prioritize program openings based on need.

VI-SPDAT training is provided and offered free of charge. The training is mandatory for HARA midlevel management, HARA front line staff, DHHS Continuum of Care mid-level management and DHHS Continuum of Care Program front line staff. The DHHS Continuum of Care Program includes the following projects: Rapid Re-Housing Initiative, Transitional Supportive Housing Leasing Assistance Program, Rural Housing & Supportive Services and the Rural Homeless PSH Initiative. HARA and DHHS Continuum of Care Program and Executive Directors are strongly encouraged to attend the training. HMIS entry is not granted to agency employees until VI-SPDAT training has been completed.

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).

Generally, each June the Division hosts an ESG application workshop. The workshop is advertised in the Oakland Press, on the Oakland County website and on the Alliance for Housing list serve. The workshop provides details on the application requirements for the emergency shelter, HMIS and homeless prevention and rapid re-housing activities. Applicants are required to submit the supporting documents including non-profit status, HMIS certification, non-debarment status, financial statements, insurance, policies and procedures and budgets. All emergency shelters that meet the application requirements receive funding based on formula. The lead agency of the CoC receives the HMIS funds. HPRP is scored based upon specific criteria and the awards are determined by committee. One-year contracts are awarded once funds are released.

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 Division has a member of Citizen Advisory Council who was preciously housed and was “couch surfing” with her child for a period. Though this does not meet the official definition of homeless, Oakland County is committee to gaining representation of formerly homeless individuals on its advisory board. However, through consultation with the Continuum of Care body and citizen participation process, the County anticipates input from homeless or formerly homeless persons. In addition, as previously required in the ESG and Homeless Prevention and Rapid Re-Housing Program, the Division is passing this requirement on to funded agencies via contract language. This requirement will be checked at monitoring. The Continuum of Care does have a formerly homeless person on their board. The Continuum of Care provides input to the Division on the ESG program.

5. Describe performance standards for evaluating ESG.

ESG Monitoring Standards and Procedures - Oakland County will continue to implement a monitoring policy to ensure that ESG recipients are following applicable requirements. Annual onsite monitoring of shelters and transitional housing providers will include inspections to ensure that housing conforms to habitability standards under the HEARTH

Act as well as LBP regulations. In addition to project performance, accountability, financial responsibility and adherence to federal grant management regulations. Monitor reviews will sample client files to ensure that case management, action plans and referrals to mainstream benefits are provided and the files are maintained appropriately.

Reimbursement requests will be reviewed, and cross referenced with contracts and procurement documents as warranted. Rapid re-housing and homeless prevention files will be checked to ensure that all required documents including homeless certification forms, income calculations, lease, recertification documents and habitability inspection reports are accurate. In addition, before reimbursement can be made verification will be required including certification of homelessness, lease documents, income calculations, as well as cancelled check and invoices. A contract will be developed requiring quarterly reimbursement requests and timely expenditure of funds. Monitoring was done via desk audits or in person as the COVID-19 pandemic restrictions allow.

Performance Measures - Oakland County's ESG program complies with CoC performance measurements which are available at <https://www.oaklandhomeless.org/>

Homeless - 65% of participants who meet the homeless definition will be stably housed 90 days after being exited from ESG/HARA through independent means or through linkage to another program (e.g. PSH, subsidized housing).

Chronically Homeless - 50% of participants who meet the chronically homeless definition will be stably housed 90 days after being exited from ESG/HARA through independent means or through linkage to another program (e.g. PSH, subsidized housing)

In April 2016, MDHHS, MSHDA and MCAH issued an important update to the SPDAT which outline the VI- SPDAT and SPDAT requirements. For the past two years SPDAT has brought Michigan further along in the goal to redesign systems by providing every community a standardized evidence-based tool to support coordinated entry while taking Housing First practices to scale statewide. Since the implementation of the VI-SPDAT, the Alliance has reported that the tool helps them gauge the progression of client self-sufficiency as it relates to housing. Because the full VI-SPDAT is used during every follow-up meeting completed with active ESG clients assisted, it is instrumental in practicing progressive engagement with clients to ensure not only that basic needs are being fulfilled but that linkage to other resources are being made. Additional MSHDA/ESG outcomes include

- Percentage of those served who maintain housing one year after assistance ends (RRH and Prevention)

- Percentage of clients that increase income within that year and/or within the timeframe of active housing assistance
- Length of time between screening/intake and moving into housing
- Minimum number of households served each PY Modifications to the residency factor in the ESG formula have been discussed at the staff level. The Division plans to meet with stakeholders and to present any proposed changes for CAC and BOC consideration. For the PY 2021-2025 Consolidated Plan the Division will follow its Citizen Participation Plan amendment process if required to address any ESG formula changes that may impact the County's program.

