

Robert A. Ficano
County Executive

September 30, 2011

Mr. Keith Hernandez
HUD – Detroit Field Office
477 Michigan Avenue
Detroit, MI 48226

SUBJECT: 2011 Consolidated Annual Performance Report for the U.S. Department of
Housing and Urban Development

Dear Mr. Hernandez:

As required by HUD, enclosed please find the Program Year 2011 CAPER along with all
required financial and match reports.

If you have any questions, please contact me at (313)224-5048

Respectfully,

Jill Ferrari, Esq.
Director of Community Development
Wayne County EDGE

Enclosures



Fourth Program Year CAPER

The CPMP Consolidated Annual Performance and Evaluation Report includes Narrative Responses to CAPER questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

The grantee must submit an updated Financial Summary Report (PR26).

GENERAL

Executive Summary

This module is optional but encouraged. If you choose to complete it, provide a brief overview that includes major initiatives and highlights that were proposed and executed throughout the first year.

Program Year 4 CAPER Executive Summary response:

Wayne County in 2007 submitted a new three-year Consolidated Plan (2007-2010). The new Consolidated Plan was necessary because three Wayne County communities joined the HOME Consortium. They were Lincoln Park, Taylor and Livonia. In 2010 HUD granted a one year extension of the 2007-2010 Consolidated Plan. In Program Year 2010-2011 two additional communities joined the HOME Consortium – Dearborn and Dearborn Heights.

The Consolidated Annual Performance Report (CAPER) is a report on Wayne County's activities connected to the Community Development Block Grant (CDBG) Program, the HOME Investment Partnership (HOME) Program and the Emergency Shelter Grant (ESG) Program, which are funded by the U.S. Department of Housing and Urban Development (HUD). This CAPER meets the reporting requirements in Section 104(e) of the Housing and Community Development Act of 1974, as amended, 24 CFR Part 91 regarding the Consolidated Planning requirements.

Wayne County must report to HUD in a systematic method all activities (including program income) related to CDBG, HOME and ESG for the time period July 1, 2010 through June 30, 2011. The following is a brief overview that includes major initiatives and highlights completed between July 1, 2010 and June 30, 2011.

Wyandotte

The City of Wyandotte performed a large scale street improvement activity. The street improvements were done in four different income qualified census tracts within Wyandotte. Improvements included replacement of inadequate portions of concrete, asphalt pavement and curbs. This activity meets the low-to-moderate income benefit national objective

Trenton

The City of Trenton performed a street improvement activity. The improvements were done in a income qualified census tract with Trenton. Improvements included resurfacing and repair of streets and parks. This activity meets the low-to-moderate income benefit national objective.

Southgate

The City of Southgate performed housing rehabilitation activities. The activity involved nine housing units with a no-interest rate loan program designed to assist low and moderate income residents with home repairs. This activity meets the low-to-moderate income benefit national objective.

Northville Township

The Township of Northville performed ADA truncated dome – crosswalk activities. The activity involved installation of ramp warning plates, truncated domes at crosswalks in the right-of-ways within the township. This activity meets the low-to-moderate income benefit national objective.

Grosse Pointe

The City of Grosse Pointe performed ADA detectible warning plate activities. The activity involved purchasing of the truncated dome detectible cast iron warning plates to be placed City-Wide for ADA compliance. This activity meets the low-to-moderate income benefit national objective.

Other Activities

More generally, CDBG monies funded a variety of activities throughout Wayne County's 34 participating communities that met National Objectives. Over \$2.5 million was used for public facility improvements. Of the \$2.5 million, approximately \$1.6 million was used to improve, water/sewer, streets and sidewalks in low-to-moderate income census tracts, benefiting over 55,000 people, and approximately \$500,000 went towards Senior Center improvements, benefiting over 7,500 seniors.

In the category of public services, \$524,445 in CDBG funds was used by sub-recipients to provide necessary services to their residents. Services that are provided using CDBG funds include senior services, mental health services, services for disadvantaged youth, services for battered and abused spouses, and transportation services for seniors and the disabled. In sum, 134,883 people benefited from the public services provided across the 34 participating communities in Wayne County. Funded the provision of senior services, services for the disabled and youth,

One of the goals listed in Wayne County's 2007-2011 Consolidated Plan is to maintain, improve and expand the supply of decent, safe, sanitary housing that is affordable to low-income, elderly, and other persons in need. Toward that goal the participating communities directed over \$1.3 million in program year 2010 toward the rehabilitation and minor repairs of single-family residential homes. Funds were used to rehab approximately 1782 housing units across the 34 participating communities in Wayne County. Rehabilitation services included addressing code violations, repairing plumbing, replacing windows, fixing roof leaks, replacing furnaces and other related tasks.

In total over 158,498 persons and 2,441 households from the low to moderate-income group were beneficiaries of CDBG-funded projects or activities between July 1, 2010 and June 30, 2011.

General Questions

1. Assessment of the one-year goals and objectives:
 - a. Describe the accomplishments in attaining the goals and objectives for the reporting period.
 - b. Provide a breakdown of the CPD formula grant funds spent on grant activities for each goal and objective.
 - c. If applicable, explain why progress was not made towards meeting the goals and objectives.
2. Describe the manner in which the recipient would change its program as a result of its experiences.
3. Affirmatively Furthering Fair Housing:
 - a. Provide a summary of impediments to fair housing choice.
 - b. Identify actions taken to overcome effects of impediments identified.
4. Describe Other Actions in Strategic Plan or Action Plan taken to address obstacles to meeting underserved needs.
5. Leveraging Resources
 - a. Identify progress in obtaining "other" public and private resources to address needs.
 - b. How Federal resources from HUD leveraged other public and private resources.
 - c. How matching requirements were satisfied.

CAPER General Question's response:

Over the past year, Wayne County focused efforts on implementing programs that address the goals and objectives set forth in Wayne County's Four-Year Action Strategy. Listed below are those goals.

- 1) Neighborhoods...promote neighborhood stability through activities that include housing rehabilitation and development, property redevelopment, infrastructure improvements, code enforcement, environmental clean-up, and elimination of blight.
- 2) Affordable Housing...reduce barriers to affordable housing for persons in need through activities that include home buying and rental assistance, weatherization and energy-efficient home improvements, and affordable housing development.
- 3) Economic Health...promote economic health and financial equity through activities that improve the business environment, facilitate regionalism and collaborations, create and retain jobs, improve job skills, and provide an overall high quality of life.
- 4) Homelessness...reduce homelessness through collaborating and integrating resources that address the special housing and service needs of homeless persons - many of whom have mental illness, substance dependence or abuse, and/or physical disabilities.
- 5) Suitable Living Environment...promote a high quality of life through activities that support the well-being of residents especially the elderly, the disabled, low-income persons and other persons with special needs.

6) Diversity...affirmatively further fair housing, facilitate equal contracting and employment opportunities for women and minority populations, and promote activities in general that celebrate diversity and strengthen equality in the community.

7) Strategic Planning...encourage long- and short-term planning and implementation strategies that identify and address priority needs as well as incorporate human and financial resources of both public and private entities.

To achieve the aforementioned goals, Wayne County maintained consistency with certifications set forth in the 2010-2011 Action Plan. These certifications served as the guiding principle for furthering the County's efforts. This includes providing citizens with input opportunities, affirmatively furthering fair housing, maintaining a drug-free workplace, anti-lobbying and other CDBG, HOME, and ESG certifications.

Table 1: 2010 – 2011 Proposed Projects

Proposed Projects	Source of Funds	Anticipated Funds	Proposed Accomplishments
Wayne County Urban County Program	HUD – CDBG	\$6,614,451.00	Up to 565 housing units rehabilitated and 120 community development projects described in this Plan.
	Revolving Loan/Program Income	\$107,900.00	
Wayne County Family Center-Lutheran Social Services of Michigan	HUD – ESG	\$257,588.00	248 persons served with residential assistance.
Proposed Projects	Source of Funds	Anticipated Funds	Proposed Accomplishments
Wayne County HOME Program	HUD – HOME Investment Partnership Program	\$3,426,847.00	Multi-family housing projects to support special needs populations (veterans, elderly, victims of domestic violence), housing rehabilitation and homebuyer assistance for low to moderate income families
	Match Contributions	\$762,475.00	
	Program Income	\$100,000.00	

Table 2 shows the comparison of federal resources planned for the Action Plan period to those received.

Table 2: 2010 – 2011 Actual Projects

Proposed Projects	Source of Funds	Anticipated Funds	Actual Funding
Wayne County Urban County Program	HUD – CDBG	\$6,614,451.00	\$6,614,451.00
	Revolving Loan/Program Income	\$107,900.00	\$108,065.12
Wayne County Family Center-Lutheran Social Services of Michigan	HUD – ESG	\$257,588.00	\$257,588.00
Proposed Projects	Source of Funds	Anticipated Funds	Actual Funding
Wayne County HOME Program	HUD – HOME Investment Partnership Program	\$3,426,847.00	\$3,426,847.00
	Match Contributions	\$762,475.00	\$1,019,729.84*

* Carryforward from previous fiscal year

Community Development Block Grant Program

PY 2011 Activity Summary

PY 2011 CDBG Funds Available: \$6,614,451.00
 PY 2011 CDBG Funds Committed: \$6,614,451.00
 CDBG Funds Expended in Program Year 2010: \$6,638,538.73

Cumulative CDBG Funding Available (since program inception): \$167,622,402.00
 Cumulative CDBG Funding Expended (since program inception): \$155,597,701.31

Goals Addressed:

1) Neighborhoods...promote neighborhood stability through activities that include housing rehabilitation and development, property redevelopment, infrastructure improvements, code enforcement, environmental clean-up, and elimination of blight.

2) Affordable Housing...reduce barriers to affordable housing for persons in need through activities that include home buying and rental assistance, weatherization and energy-efficient home improvements, and affordable housing development.

- 3) Homelessness...reduce homelessness through collaborating and integrating resources that address the special housing and service needs of homeless persons - many of whom have mental illness, substance dependence or abuse, and/or physical disabilities.
- 4) Suitable Living Environment...promote a high quality of life through activities that support the well-being of residents especially the elderly, the disabled, low-income persons and other persons with special needs.
- 5) Diversity...affirmatively further fair housing, facilitate equal contracting and employment opportunities for women and minority populations, and promote activities in general that celebrate diversity and strengthen equality in the community.
- 6) Strategic Planning...encourage long- and short-term planning and implementation strategies that identify and address priority needs as well as incorporate human and financial resources of both public and private entities.

Summary of Program Year 2010 Accomplishments for CDBG

During the 2011 Program Year Wayne County expended \$6,638,538.73. These funds are comprised of all open projects from the current and prior fiscal years. A summary of the amounts disbursed by activity is provided in TABLE 3 below.

Table 3: 2010-2011 Actual Expenditures

Activity Description	Amount
Clearance and Demolition	\$99,751.33
Relocation	\$265,405.00
Economic Development – Rehab Commercial Buildings	\$54,800.00
Rehab; Single Unit Residential	\$1,225,745.41
Rehab; Multi-Unit Residential	\$55,920.74
Code Enforcement	\$86,322.93
Public facilities and improvements (general)	\$170,748.37
Senior centers	\$513,539.46
Neighborhood Facilities	\$28,950.00
Parks, recreational facilities	\$67,939.31
Water/Sewer Improvements	\$891,305.85
Street improvements	\$482,122.16
Sidewalks	\$396,691.02
Fire Station/Equipment	\$79,644.94
Operating Costs of Homeless/AIDS patients	\$13,722.70
Senior services	\$332,947.11
Youth Services	\$35,000.00
Transportation Services	\$97,368.08
Battered and Abused Spouses	\$34,000.00
Mental Health Services	\$11,407.00
General Administration and Planning	\$23,400.00
General Program Administration	\$1,443,156.12
General Administration (Fair Housing Activities)	\$22,148.00
Repayments of Section 108 loans	\$196,503.20
Total Expenditures	\$6,628,538.73

Below in Table 4 is a list of activities with their associated performance measures as they were reported in IDIS for program 2010. The table serves as a template to viewers as to how the data were entered in IDIS per activity and the activity's objective and outcome.

Table 4: Performance Measurement for PY 2010 Activities

Activity	Wayne County Community Dev Goals	Objective	Outcome	Outcome Statement
Removal Architectural Barriers	Promote Quality of Life	Suitable Living Environment	Improve Availability/ Accessibility	# of LMI persons with new or improved access for purpose of creating a suitable living environment
Senior Centers	Promote Stable Neighborhoods	Suitable Living Environment	Improve Sustainability	# of LMI persons (seniors) with new or improved sustainability for purpose of creating a suitable living environment
Community Centers	Promote Stable Neighborhoods	Suitable Living Environment	Improve Sustainability	# of LMI persons with new or improved sustainability for purpose of creating a suitable living environment
Parks-Recreational Facilities	Promote Stable Neighborhoods	Suitable Living Environment	Improve Sustainability	# of LMI HH with new or improved sustainability for the purpose of creating suitable living environment
Water & Sewer Improvements	Promote Stable Neighborhoods	Suitable Living Environment	Improve Availability/ Accessibility	# of LMI HH with new or improved access for purpose of creating a suitable living environment
Street Improvements	Promote Stable Neighborhoods	Suitable Living Environment	Improve Sustainability	# of LMI HH with new or improved sustainability for the purpose of creating suitable living environment
Sidewalks	Promote Stable Neighborhoods	Suitable Living Environment	Improve Sustainability	# of LMI HH with new or improved sustainability for the purpose of creating suitable living environment

Activity	Wayne County Community Dev Goals	Objective	Outcome	Outcome Statement
Tree Planting	Promote Stable Neighborhoods	Suitable Living Environment	Improve Sustainability	# of LMI HH with new or improved sustainability for the purpose of creating suitable living environment
Fire Equipment	Promote Quality of Life	Suitable Living Environment	Improve Sustainability	# of LMI HH with new or improved sustainability for the purpose of creating suitable living environment
Public Services	Promote Quality of Life	Suitable Living Environment	Improve Availability/Accessibility	# of LMI persons with new or improved access for purpose of creating a suitable living environment
Housing Rehabilitation	Promote Stable Neighborhoods	Decent Housing	Improve Affordability	# of LMI HH have sustained affordable housing by repair for the purpose of providing decent housing
Minor Home Repair	Promote Stable Neighborhoods	Decent Housing	Improve Affordability	# of LMI HH have sustained affordable housing by repair for the purpose of providing decent housing
Clearance & Demolition	Promote Stable Neighborhoods	Suitable Living Environment	Improve Sustainability	# of LMI HH with new or improved sustainability for the purpose of creating suitable living environment
Code Enforcement	Promote Stable Neighborhoods	Suitable Living Environment	Improve Sustainability	# of LMI HH with new or improved sustainability for the purpose of creating suitable living environment

Program Overview

In the 2010-2011 Program Year, Wayne County received an allocation of \$6,614,451 in Community Development Block Grant funds and through its sub grantees generated \$108,065.12 in program income/revolving funds.

A portion of Wayne County's CDBG funds was allocated to the 34 participating communities through a formula, approved by the CDBG Advisory Council, which considers each community's total population and low- and moderate-income population. Through these funds, the participating communities have the ability to undertake a variety of activities allowable under the Federal Regulations so long as they meet one of three national objectives:

1. To assist low- and moderate-income persons;
2. To address slum and blight conditions;
3. To meet a particularly urgent community development need that poses a serious and immediate threat to the health and welfare of the community.

The Wayne County CDBG communities include the following 34 participating communities:

Allen Park	Inkster
Belleville	Melvindale
Brownstown Township	Northville
Ecorse	Northville Township
Flat Rock	Plymouth
Garden City	Plymouth Township
Gibraltar	River Rouge
Grosse Ile Township	Riverview
Grosse Pointe	Rockwood
Grosse Pointe Farms	Romulus
Grosse Pointe Park	Southgate
Grosse Pointe Woods	Sumpter Township
Grosse Pointe Shores	Trenton
Hamtramck	Van Buren Township
Harper Woods	Wayne
Highland Park	Woodhaven
Huron Township	Wyandotte

The total Community Development Block Grant (CDBG) expenditures in PY 2011 were \$6,638,538.73. The distribution by community is above. It should be noted that these distributions represent what subrecipients vouchered the County for reimbursement of money spent on HUD eligible activities.

Chart 1 below shows households by income brackets. You can see the breakout of low- to moderate income beneficiaries: 48 percent of the households were moderate income, 39 percent low and 13 percent very low. Chart 2 shows a similar breakout of the low- to moderate income brackets by persons.

**Chart 1: Percent of CDBG Beneficiaries (Households)
By Income Category**

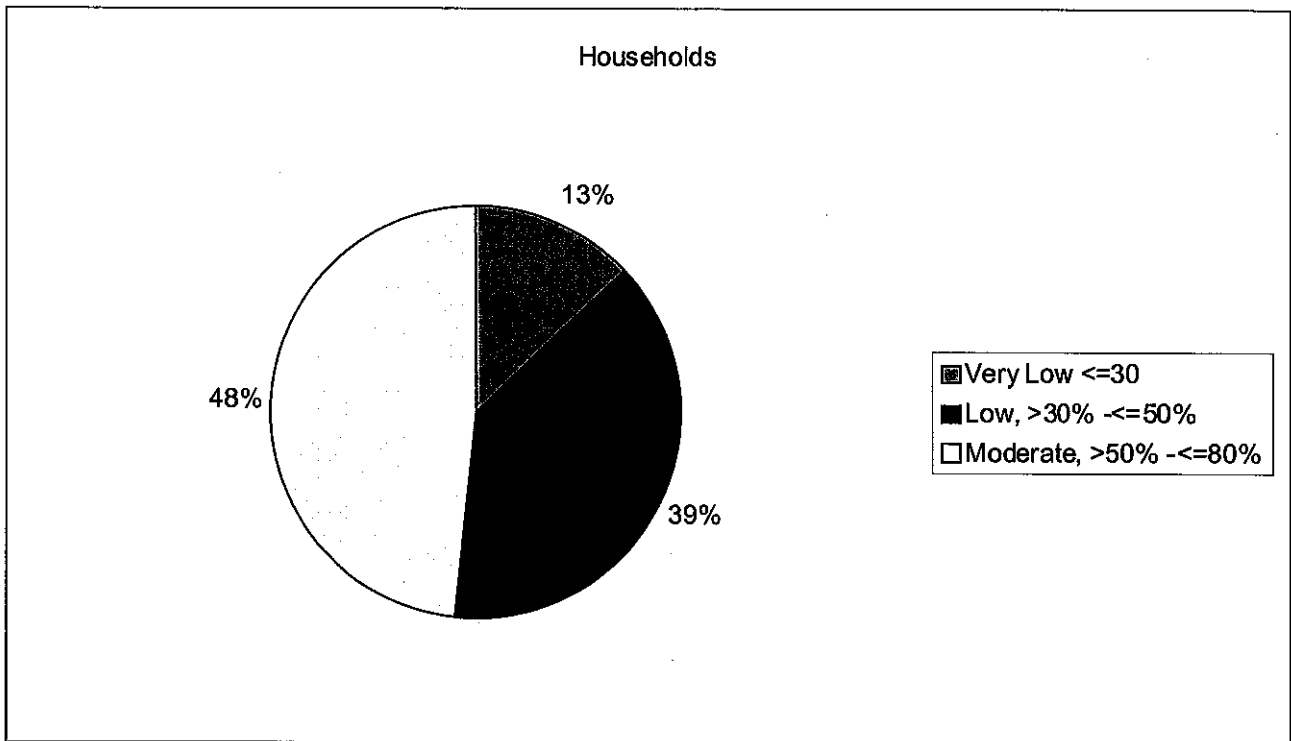


Chart 2: Percent of CDBG Beneficiaries (Persons) by Income Category

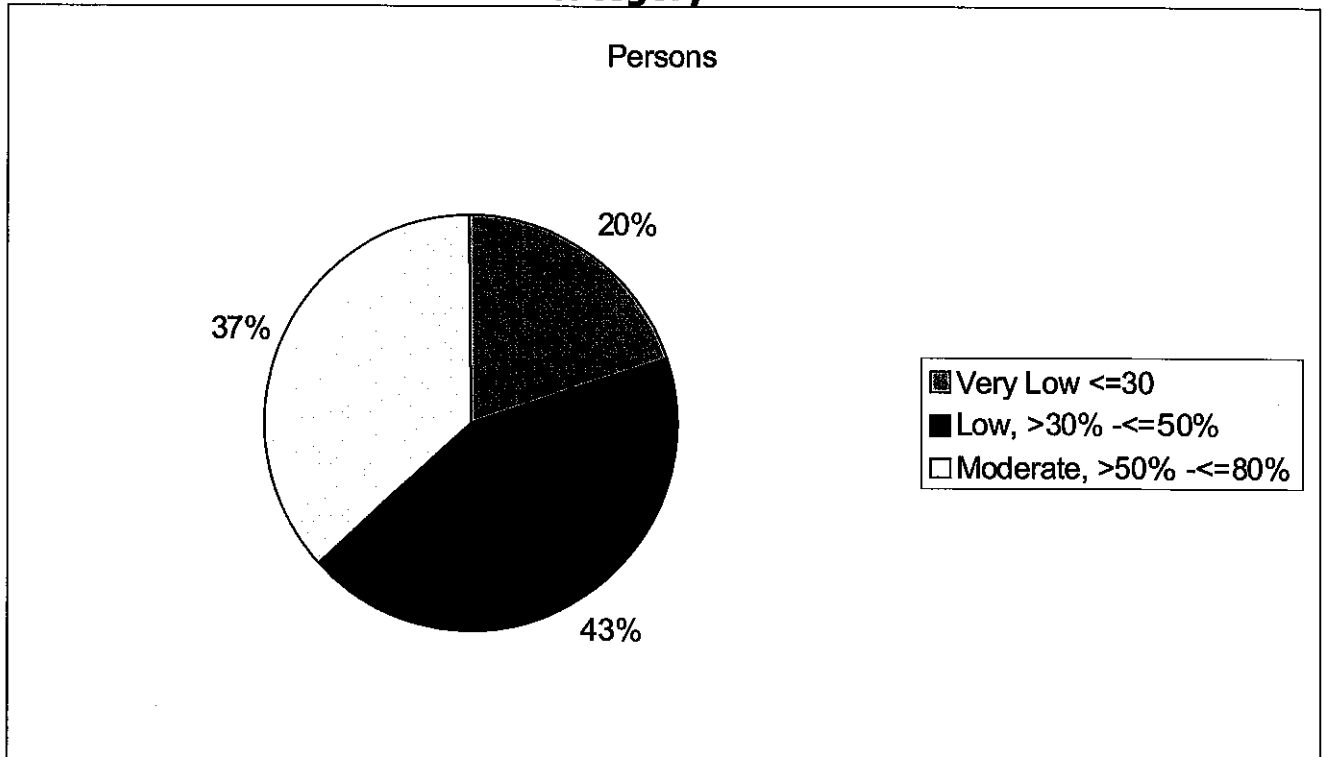
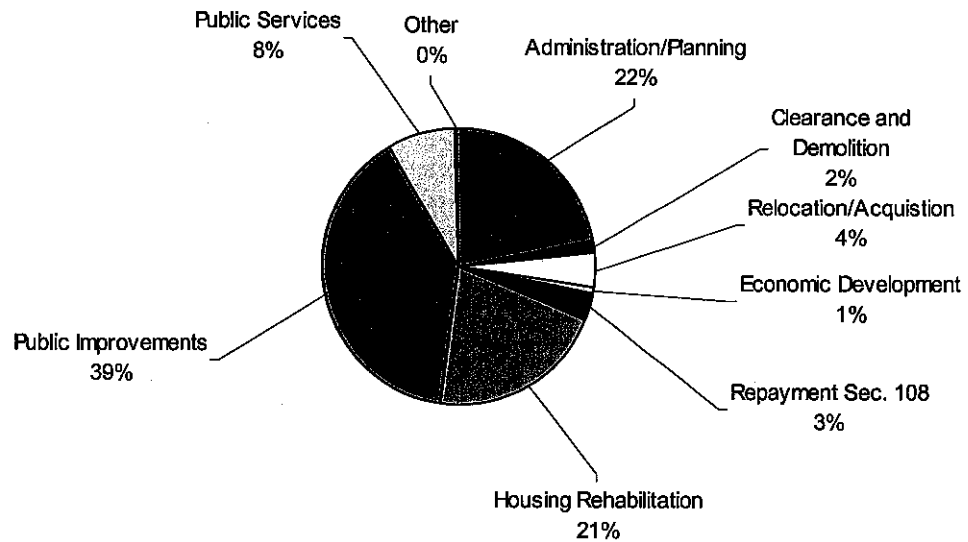


Chart 3: 2010 - 2011 CDBG Expenditures by Category



Emergency Shelter Grant

PY 2010 ESG Funds Available:	\$257,588.00
PY 2010 ESG Funds Committed:	\$257,588.00
ESG Funds Expended in Program Year:	\$257,588.00
Cumulative ESG Funding Available (since program inception):	\$3,512,057.00
Cumulative ESG Funding Expended (since program inception):	\$3,512,057.00

GOALS ADDRESSED:

4) Homelessness...reduce homelessness through collaborating and integrating resources that address the special housing and service needs of homeless persons - many of whom have mental illness, substance dependence or abuse, and/or physical disabilities.

5) Suitable Living Environment...promote a high quality of life through activities that support the well-being of residents especially the elderly, the disabled, low-income persons and other persons with special needs.

Summary of Program Year 2010 Accomplishments for ESG

<u>Persons Assisted</u>	<u>248</u>
American Indian	0
Asian	0
Black	170
Black African American& White	2
Hispanic	2
Native Hawaiian or Other Pacific Islander	0
White	74

The Wayne County Family Center provides other services beyond shelter. They include childcare, transportation, outreach, health care and employment services.

The Wayne County Family Center utilized the following funding sources and in-kind contributions in fiscal year 2010. They were:

Wayne County CDBG	\$ 29,000.00
HUD	\$ 76,234.00
Other Federal Funds	\$209,965.00
State Government	\$106,010.00
Local Government	\$ 62,989.00
Private Funds	\$ 57,423.00
Other	<u>\$ 27,878.00</u>

HOME Investment Partnership Program

PY 2010 Activity Summary

PY 2010 HOME Funds Available:	\$3,426,847.00
PY 2010 HOME Funds Committed:	\$2,752,643.43
HOME Funds Expended in Program Year 2010:	\$3,383,162.00
Match Liability FY 2011:	\$662,052.67
Matching Funds FY 2011:	\$1,019,724.84

Total number of assisted units: 101

Cumulative Activity Summary

Cumulative HOME Funding Available (since 1992):	\$38,171,971.65
Cumulative HOME Funding Expended (since 1992):	\$27,972,981.63

Goals Addressed

- Goal 1: Dedicate Wayne County and local community resources, both public and private, toward supporting affordable housing opportunities and promoting fair housing.
- Goal 2: Improve the residential environment by promoting the stabilization and/or long-term revitalization of neighborhoods with balanced housing opportunities, neighborhood improvements, and economic development.
- Goal 3: Increase homeownership opportunities for low- and very- income individuals and families by reducing the cost of homeownership, maintaining homeownership, and promoting fair housing.
- Goal 4: Build public/private partnerships by encouraging planning and implementation strategies, which incorporate human and financial resources of both public and private entities.

Summary of Program Year 2010 Accomplishments

The Department of Housing and Urban Development (HUD) allocates funds under the HOME Investment Partnership Grant Program by formula among eligible state and local governments to strengthen public-private partnerships and to expand the supply of decent, safe, sanitary, and affordable housing. HOME funds must be matched by nonfederal resources. State and local governments that become participating jurisdictions may use HOME funds to carry out multi-year housing strategies through acquisition, rehabilitation, new construction of housing, and tenant-based rental assistance.

Administration

The HOME Program staff continued to build and refine innovative affordable housing initiatives through the use of federal HOME funds. In addition, the HOME Program administration performed the following:

- coordinated with other County programs - Community Development Block Grant Program, Wayne County Brownfield Redevelopment Authority, Neighborhood Stabilization Program and the Land Bank Authority to develop and administer housing programs; and
- reached underserved markets with affordable housing programs and homeownership information.
- stayed at the forefront of an evolving housing market and amending County policies as needed to preserve homeownership.
- continued the Wayne County HOME Consortium, which includes the cities of Dearborn, Dearborn Heights, Lincoln Park, Livonia, and Taylor.

Wayne County HOME Program Descriptions

The Department of Economic Development utilizes HOME funds to offer several programs to expand the long-term supply of *decent, safe, sanitary* and *affordable* housing throughout Wayne County. The HOME Program allows the County to support the development of for-sale and rental housing developments that are made available to low and very-low-income households. Projects may involve new construction or rehabilitation for either rental or ownership, rehabilitation of owner-occupied homes, or homebuyer assistance for existing or new homes. The following programs were in effect during the 2010 Program Year.

Wayne County Project-Based Financing

Wayne County's Project-based Financing Program allows the County to meet its objective of creating affordable homeownership opportunities for low-income households. Through the use of both development subsidies and homebuyer assistance, specific projects can be supported that will have a significant impact on local neighborhoods. Oftentimes these projects require a deep subsidy and primarily serve low-income households at the upper end of the eligible-income strata, however its value lies in the visible and economic impact that it generates. Funding is reserved for projects that are expected to serve as a catalyst to jumpstart and stabilize local housing markets within the six designated economically distressed communities, which are Highland Park, Inkster, Melvindale, River Rouge, Hamtramck and Ecorse.

Wayne County provides gap financing for home ownership projects that involve either new construction or rehabilitation. The purpose of this program is to provide assistance to developers that are undertaking transformational projects that would not be possible without the support of Wayne County. Developers interested in participating in the program are required to complete a HOME Program Application. Applicants must have site control in order to be considered for the funding. Each project is analyzed individually to determine the level of subsidy needed to achieve marketability and affordability within that specific housing market.

Under this arrangement, the County enters into a development and loan agreement with the organization. The County then provides a blend of development loans and grants as needed to bridge the gap between the Total Development Cost and the Appraised Market Value. These upfront funds can be used for certain predevelopment cost, acquisition and hard construction costs, which ultimately serve as a Development Subsidy. Typically, these subsidies range from \$10,000 to \$40,000.

Low-income homebuyers are eligible for additional assistance in the form of a deferred loan equal to the difference between the appraised value of the property and the primary mortgage amount that they could qualify for. The homebuying assistance to each family is typically in the form of a 0%-interest deferred loan secured with the property and due and payable upon the sale of the home or refinance of the primary mortgage. Applicants must pay at least \$1,000 of their own funds toward the purchase and contribute at least 26%, but no more than 30% of their monthly incomes toward housing expenses including mortgage, property taxes, home insurance, and mortgage insurance. Typically these deferred loans do not exceed \$30,000.

These projects typically involve a mixture of market rate and low-income units. This program has been used successfully to construct a number of mixed income condominium developments, subdivision, and infill projects. CHDOs, other non-profit organizations, and local communities are eligible for HOME Funds through the Project-Based Financing Program.

Rental Housing Program

Wayne County can provide gap financing for the development of newly constructed or rehabilitated rental housing serving very-low income households, seniors, homeless, or the disabled throughout the 33 participating communities. Typically these are projects that primarily supported through subsidies from either HUD Section 202, 811 or Supportive Housing Programs; Low Income Housing Tax Credits from the Michigan State Housing Development Authority; or other similar funding agencies.

HOME funds can be used to fill a gap in financing of up to \$500,000. All projects are required to achieve an Energy Star certification.

Developers interested in participating in the program are required to complete a HOME Program Application. Applicants must have site control in order to be considered for funding. The County's contribution may be in the form of a loan or a grant to the project, however it will be secured through a second mortgage to guarantee that the units remain affordable to very-low income households throughout the HUD required affordability period.

CHDO Projects

The HOME program requires Wayne County to set-aside 15 percent of the annual allocation to CHDOs. A CHDO is a nonprofit organization with the purpose to provide housing that is affordable to low-income persons, as evidenced in its articles of incorporation or by-laws. This exclusive set-aside for CHDOs mandates the County's support for community-based organizations and promotes increased responsiveness to low-income neighborhoods within our distressed communities. All funds committed to CHDOs must be invested in housing owned, developed or sponsored by the designated CHDOs. CHDO Set-Aside funds are used with both the Project-Based Financing Program and Rental Program. Wayne County has

reserved a higher allocation than the mandated 15% to this important group of organizations, averaging a 19.6% CHDO set-aside since 1992.

CHDO Operating Assistance

HOME program guidelines permit Wayne County to set-aside up to 5 percent of the annual allocation for operating expenses by CHDOs. This additional funding helps increase the capacity of CHDOs for which the HOME program guidelines require Wayne County to set-aside 15 percent of the annual allocation for housing projects. Wayne County often provides CHDO Operating funds to CHDOs that are implementing a Project utilizing the Project-Based Financing or the Rental Housing Program.

Homebuyer Assistance Program

Wayne County contracts with a nonprofit subrecipient to provide the homebuyer assistance in combination with homeownership counseling. The nonprofit subrecipient conducts comprehensive marketing campaigns with targeted outreach to occupants of public and manufactured housing and others assisted by public housing agencies. In addition, the homeownership counseling provided by the subrecipient prepares families for the increase and change in responsibilities that come with the transition from renting to homeownership. Furthermore, homeownership counseling helps reduce the likelihood of foreclosures because: 1) applicants who are not strong candidates for mortgages are given step-by-step action plans to becoming better qualified (i.e. improving credit history, savings, income) 2) it provides opportunities to handhold clients through the mortgage process and reinforce their impending financial obligation, and scrutinizes loan documents prior to approval.

Homeowner Rehabilitation Loan Program

During the 2010 Program Year the County continued its Homeowner Rehabilitation Programs within the HOME Consortium Communities of Dearborn, Dearborn Heights, Lincoln Park, Livonia and Taylor. In addition, the County awarded homeowner rehabilitation funding to the City of Ecorse. As conditions in the housing market have softened, and as incomes have dropped, the need for such assistance has increased and has become a greater priority. The purpose of the Homeowner Rehabilitation Program is to provide low cost loans to low-income homeowners to make improvements to their homes that will bring the property into compliance with local housing codes. Most Wayne County communities currently offer such programs through their Community Development Block Grant allocations. In this event, the HOME funds are used to augment their existing programs. To the extent possible, the program parameters are the same for the two funding sources, the chief distinction being the HOME requirement that the entire property be brought up to local housing code upon completion of the rehabilitation.

Program Year 2010 Projects and Expenditures

Morningside Phase III

Habitat for Humanity - Detroit (HHD) finished the construction of 8 single family homes and rehabilitation of 2 single family homes in the City of Detroit. This project, awarded \$900,000 in HOME funds, is located in the Morningside Community on the lower east side of Detroit, located just across Mack Avenue from Grosse Pointe Woods. This project was a partnership with the County's Mortgage Foreclosure Prevention Program.

During the 2010 Program Year, \$602,303.32 was disbursed for construction and rehabilitation costs.

Neighborhood Housing Solutions

During the 2010 Program Year, Neighborhood Housing Solutions, (NHS), was awarded \$2,306,798.00 in HOME Funds for the acquisition, rehabilitation and homebuyer assistance for 25 foreclosed single family homes in the City of Hamtramck. This project is being coordinated with MSHDA and the City of Hamtramck.

Frenchman's Cove

The County awarded \$300,000 in funding to facilitate the completion of this project, a 6 unit condominium complex in the City of Melvindale. During the 2010 program year, \$150,000.00 was disbursed on the project.

8336 Nightengale

American Loan Servicing LLC, a Dearborn-based developer purchased a single family home at 8336 Nightengale in Dearborn Heights. The income-eligible occupant of the newly rehabilitated home will initially lease the property with the option to purchase it in the future.

During the 2010 Program Year, \$130,000.00 was disbursed to this project to acquire the property.

Rental Housing Program

NSO Bell Building

Neighborhood Service Organization (NSO) has undertaken an ambitious \$26 million acquisition and redevelopment of the vacant Bell Building in the City of Detroit. This project, which also includes funding from MSHDA and the City of Detroit, will provide 155 units of permanent supportive housing for the homeless, with newly established supportive services.

This project was awarded \$1,000,000 in HOME funding, and during the 2010 program year, \$327,701.28 was disbursed for acquisition costs of the building.

First Step

During the 2010 program year, construction was completed and the ground-breaking ceremony held for First Step, a 10-unit transitional housing center specifically designed to assist victims of domestic violence. The facility provides services to victims onsite, including food, clothing and housing, advocacy, children's individual and group support parenting groups, legal information and referrals, and education. \$1,403,600.00 was disbursed on this project in Program Year 2010.

Veteran's Center Project

This project, located in the City of Ecorse, was awarded \$1,000,000 in HOME funds to undertake the construction of 11 single room occupancy units of transitional housing for veterans. The developer, Salliotte Development, LLC, has a successful track record of implementing HOME projects in the City of Ecorse for low income families and senior citizens.

ML Sawicki, LLC

ML Sawicki, LLC, a Wyandotte-based developer, undertook the renovation of an upper flat apartment unit on Biddle Avenue in the City of Wyandotte. This is one of two current HOME

projects on Biddle Avenue in Wyandotte, where available upper unit space above local retailers undergoes renovation. These units fit well in the City's plan to endorse upper housing units to help stabilize not only the city's housing market, but also its business district.

This project was awarded HOME funds of \$169,711.00, and during the 2010 Program year, \$107,249.00 was disbursed for rehabilitation costs.

The Lofts at Willow Tree

This renovation project is also on Biddle Avenue in the City of Wyandotte, where vacant commercial space above a local retailer is being rehabilitated for use as 4 residential, two-bedroom apartments for income-eligible tenants. This 2010 project was awarded \$300,000.00 in HOME funds, and the rehabilitation is underway as of the writing of the CAPER report

Oakman Place

During the 2010 program year, \$325,000.00 of HOME funds were disbursed to develop a 24-unit apartment complex in the City of Detroit in the Focus: Hope "target community" that also includes the City of Highland Park. The project, developed by Lutheran Child and Family Service of Michigan (LCFS of Michigan), will be comprised of 15 two-bedroom and 9 one-bedroom apartments. The one-bedroom units will be reserved to provide an opportunity for homeless youth to obtain housing as they move into the adult world.

LCFS of Michigan is a not-for-profit corporation that provides a range of programs and services for children and families. Supportive services will be available for all tenants of the apartment complex, and the close proximity to the Focus: Hope campus may afford tenants the opportunity for vocational training and other services.

CHDO Operating Assistance

During the 2010 HOME Program Year, Wayne County did not disburse any CHDO operating funds.

Homebuyer Assistance Program

Wayne County contracts with a nonprofit subrecipient to provide the homebuyer assistance in combination with homeownership counseling. The nonprofit subrecipient conducts comprehensive marketing campaigns with targeted outreach to occupants of public and manufactured housing and others assisted by public housing agencies. In addition, the homeownership counseling provided by the subrecipient prepares families for the increase and change in responsibilities that come with the transition from renting to homeownership. Furthermore, homeownership counseling helps reduce the likelihood of foreclosures because: 1) applicants who are not strong candidates for mortgages are given step-by-step action plans to becoming better qualified (i.e. improving credit history, savings, income) 2) it provides opportunities to handhold clients through the mortgage process and reinforce their impending financial obligation, and scrutinizes loan documents prior to approval.

During the 2010 Program Year \$159,750.00 was expended, providing assistance to 26 first-time homebuyers.

Homeowner Rehabilitation Program**Livonia Housing Rehabilitation**

The City of Livonia, through its Housing Commission has successfully administered a Housing Rehabilitation Loan Program for over 20 years, providing assistance to at least 300 low-income households throughout the city of Livonia. The City originates loans in amounts ranging from \$1,500 to \$15,000 depending on the level of repairs needed on the property. These loans are deferred and have interest accruing on a sliding scale based on the applicant's income as a percentage of area median income.

In 2006 Livonia entered into a HOME Consortia with Wayne County and has decided to utilize a portion of its HOME allocation to augment their existing program. During the 2010 Program Year, three (3) homes were rehabilitated and a total of \$59,136.40 was disbursed.

Lincoln Park Housing Rehabilitation

The City of Lincoln Park, also a member of the HOME Consortia, rehabilitated eight (8) homes during the 2010 Program Year, and a total of \$115,722.00 was disbursed.

City of Ecorse

The City of Ecorse was awarded \$100,000 of HOME funds on Program year 2010 to facilitate the rehabilitation of 6-10 homes within the city.

Table 4: 2010 HOME Program Summary for HOME-Assisted Units

Project/Program	Pre-Construction Phase	Number Underway	Number Completed	Amount of Funds Drawn in PY 2010
Habitat for Humanity - Morningside	0	0	8	\$602,303.32
Neighborhood Housing Solutions	25	0	0	\$0.00
8336 Nightengale	0	0	1	\$130,000.0
NSO-Bell Building	0	5	0	\$327,701.28
Frenchman's Cove	0	0	3	\$150,000.00
First Step	0	0	4	\$1,406,300.00
ML Sawicki	0	0	1	\$107,249.00
Lofts at Willow Tree	0	4	0	\$0.00
Oakman Place	0	2	0	\$325,000.00
Veterans Center	11	0	0	\$0.00
Livonia Consortia Homeowner Rehab	0	0	3	\$59,136.40
Lincoln Park Consortia Homeowner Rehab	0	0	8	\$115,722.00
First Time Homebuyer Program	0	0	26	\$159,750.00
Total	36	11	54	\$3,383,162.00

HOME Match Requirement

Wayne County must make contributions to housing that qualifies as affordable housing under the HOME program, throughout the fiscal year. The contributions must total not less than 25 percent of the funds drawn down during the Federal Fiscal Year (October 1 through September 30), excluding funds drawn for administration and CHDO operating expenses. Wayne County has met this match requirement through the recognition of a variety of contributions towards HOME-Funded Projects and Programs.

Excess match carried over from fiscal year 2010 totaled to \$1,019,729.84. This surpasses the match liability amount for the year of \$662,052.67 by \$357,672.17. For further detail refer to the 2011 HOME Match Report (form HUD-40107-A) included in this report.

HOME Affirmative Marketing Plan Requirement

Wayne County has an Affirmative Marketing Plan that is applied to all rental and homebuyer projects containing 5 or more HOME-assisted housing units. The Affirmative Marketing Policy is included in applicable written agreements between Wayne County and the entity carrying out the project. The policy requires advertising that includes the equal housing opportunity logo and special outreach measures to inform and solicit applications from persons in the housing market area who are not likely to apply for the housing. The project owner or manager must maintain records tracking these efforts and the outcomes.

As part of its monitoring review process, Wayne County requires that those HOME projects containing 5 or more HOME-assisted units submit a current copy of their Affirmative Marketing Plan annually.

Monitoring of Continuing Compliance of the HOME Program

For homebuyer assistance, the affordability requirements are secured with the property through a second mortgage under the recapture guidelines. The mortgage is secured as lien with the property. When the owner decides to sell the property, the lien is called up in the review of title. At that point, the owner must comply with the affordability requirements in order to sell the property. In light of changes to the region's housing market and mortgage industry dynamics, the HOME program has adopted a flexible, multi-tiered policy to recapture funds in and when net proceeds are available. Each transaction is assessed on a case-by-case basis and a reasonable payoff amount is determined based on the options allowed in 24CFR92.254(a)5ii.

For each rental housing development, a lien is placed with the property to secure the affordability requirements for the required length of time. In addition, the Community Development Division staff creates a monitoring plan designed to meet the HOME regulations that correspond to the particular characteristics of the project. Custom-made plans are important because certain characteristics such as the number of HOME-assisted units and new construction versus rehabilitation dictate the length of time and frequency a project is monitored. Some of the HOME requirements that projects are monitored for include but are not limited to affordability, property standards, and income qualifications of the tenants. A database management system is used to track the periodic monitoring requirements of the HOME-assisted units throughout their affordability periods.

In addition, the Community Development Division staff conducts annual in-house audits of all grantees with projects and programs that are underway. After such review, a determination is made as to whether an on-site monitoring review is necessary. This determination is made based on prior findings that remain open, closed findings which need to be verified, outstanding independent audit findings, performance reporting issues, fiscal issues, and/or other appropriate areas that warrant additional monitoring.

Community Development Division Staff also conducts periodic on-site inspections of HOME projects that are under development. This ensures that the HOME projects are progressing as scheduled; any noted deficiencies are corrected in a timely manner; the properties being constructed or rehabilitated meet Housing Quality Standards; and all applicable HOME program requirements are fulfilled.

HOME Funds Distribution for Categories of Housing Needs

Priority Housing Needs	Number in Pre-Construction or Underway	Number Completed	Amount of HOME Funds Drawn
Owner, 0-50% income	0	22	\$660,698.02
Owner, 51-80% income	25	27	\$556,213.75
Renter, 0-50% income	16	4	\$1,734,001.23
Renter, 51-80% income	6	1	\$432,249.00
Total	47	54	\$3,383,162.00

Managing the Process

1. Describe actions taken during the last year to ensure compliance with program and comprehensive planning requirements.

CAPER Managing the Process response:

In program year 2010 Wayne County continued to ensure compliance with program and comprehensive planning requirements. In program year 2009 Wayne County was able to add Hennessey Engineers Inc. to act as a third party administrator. Through the addition of Hennessey Engineers the County was able to increase its capacity for technical assistance and vastly improve the "turn around" time on CDBG sub-recipient reimbursement requests. Technical assistance includes: telephone calls, e-mails, letters, office visits, and site visits. Included in Hennessey's scope of services, are the daily operations of CDBG and HOME as well as planning/preparing, pre-development, and monitoring. EDGE Staff is directly responsible for project approval, budgeting, financial management, IDIS entry and recordkeeping.

Wayne County continues to focus on coordination with the sub-recipient communities through the Wayne County CDBG Advisory Council. Through the Advisory Council elected officials from sub-recipient communities are able to participate in the administrative process.

The County also provides comprehensive trainings every fall. The training enables representatives from the sub-recipient communities to ask questions and share knowledge with each other. By training the County's grantees and providing more individual attention, the County better ensures compliance with program regulations and requirements. By providing a forum for discussion at the trainings, the County enables its sub-recipients to exchange information and ideas. When communities can provide technical assistance to each other, it better ensures overall compliance with public services and administration caps and comprehensive planning requirements. Wayne County also benefits from the feedback gained at the training and is better able to assist sub-recipient communities and implement effective policies.

Citizen Participation

1. Provide a summary of citizen comments.
2. In addition, the performance report provided to citizens must identify the Federal funds made available for furthering the objectives of the Consolidated Plan. For each formula grant program, the grantee shall identify the total amount of funds available (including estimated program income), the total amount of funds committed during the reporting period, the total amount expended during the reporting period, and the geographic distribution and location of expenditures. Jurisdictions are encouraged to include maps in describing the geographic distribution and location of investment (including areas of minority concentration). The geographic distribution and expenditure requirement may also be satisfied by specifying the census tracts where expenditures were concentrated.

*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.

Action Plan Citizen Participation response:

CAPER Citizen Participation response:

As a function of the Consolidated Planning process, The Wayne County CAPER is prepared by the Community Development Division of the Wayne County Department of Economic Development. The citizen participation process begins with planning for the Action Plan with public hearings held by the 34 of the participating communities in their local jurisdictions. They are held between the dates of December 2010 and February 2011. The Wayne County Community Development Division requires each of the participating communities to submit minutes from their advertised public hearings so we can capture public input about the CDBG program.

In an attempt to generate public comments on the 2011-2012 Action Plan, the County advertised two public hearings at 10am on July 12 and 26 at Wayne County, 500 Griswold Avenue, 10th floor, Detroit, MI 48226. The advertisement directs the public to the County website to review the Action Plan and lists a contact person to obtain hard copies of the Action Plan from. The advertisement ran in the Detroit Free Press on Sunday June 19, 2011. The public hearing for the 20109 CAPER will be held at 10:00am at Wayne County, 500 Griswold Avenue, 10th floor, Detroit, MI 48226. Any comments received at the public hearing will be included below.

All of the County's participating communities also advertised and conducted public hearings on their proposed projects for the 2011 program year. The following section discusses communities that held public hearings where public comments were offered.

Riverview Public Hearing, January 18, 2011

Charles Bakhaus questioned benefit of Downriver Guidance Center - \$4,000.00

Ecorse Public Hearing, February 22, 2011

Resident - Ms. Petilkowski asked when will the funding for demolition start?

Answer - July 1, 2011

Resident - Carl Wilhelm asked what does the Ordinance office duties under this funding and a complaint that the tickets are not prosecuted

Answer - He would be monitoring properties to make sure owners are in compliance with the City of Ecorse codes for maintenance and control of trash, debris and noxious weeds as well as other blight concerns. We will forward his complaints to the EFM and follow up on his concerns.

Mayor Pro-tem. Darcel Brown asked how long was the commitment for the fire truck?

Answer - 5 years from 2009-2014

Mayor Pro-tem Darcel Brown asked who qualifies for Housing Rehab?

Answer - Criteria and standards set forth by HUD. Those who are low to moderate income homeowners an invitation was given to anyone who wants more information and application please see the CDBG Coordinator for the required paperwork and application guidelines Mon - Fri 8:30 am - 4:30 pm

Resident - Carl Wilhelm asked what is the process for determining if a house is to be demolished?

Answer - there is a dangerous building board that evaluates the properties with the assistance of the safety manager and the EFM and the City Attorney that uses a criteria to determine the severity of the abandoned and blighted surfaces.

Deborah Hoffman asked does anyone have any other questions

Answer No

Grosse Ile Township Public Hearing, January 24, 2011

Trustee Frucci asked what type of rehabilitation work would be done at the airport/commerce park?

Answer - Airport Manager Thiel stated that the funds would be used to assist businesses to move into the Commerce Park buildings, to attract new businesses and retain existing businesses.

Trustee Johnson asked about the deadline to use the funds

Answer - Recreation Director Rooney indicated there is an eighteen month deadline unless they are re-programmed.

Supervisor Loftus asked for additional public comments.

Answer - none was offered

Inkster Public Hearing, January 28, 2011

Jeannie Fields, Housing and Economic Development Manager opened the meeting to discuss the application for the \$350,000 potential grant dollars from Wayne County; however, funding is unsure at this point

Larry Motley suggested use of block grant dollars to help block clubs.

Jessie Shelby questioned the intended use of grant dollars

Answer - J. Fields explained specific use for grant dollars for emergency, non-emergency and rehabilitation. Cannot be used for luxury items such as air conditioning/garage repairs. Description of use on website.

C. Owens is concerned how the dollars are being allocated i.e. administrative costs

Answer – J.Field explained administrative cost covers several areas, not just staffing. HUD is strict how dollars can be spent. Ten year commitment to pay Carver Home bonds; once paid can utilize dollars for other activities.

M. Hendricks questioned limited activities; come communities have to forfeit funds because cannot be used for the specified reasons. City received additional dollars for Carver Homes.

H. Crump requested qualifications for home rehabilitation

Answer – J. Fields referred to HUD eligibility chart (several qualifications)

H. Crump questioned matching funds?

Answer – J. Fields, no, lien on property, payment when property is sold or transferred

M. Hendricks questioned when is the CDBG meeting date?

Answer – J. Fields, in the spring

Mayor requested posting of date for citizens

Dennard Shaw questioned are the funds used for flooded basement?

Answer – only for sewage backup and singular incident

T. Williams requested written information?

Answer – J. Fields indicated to call office (313.563.7709) for information or call for an appointment

L. Motley questioned can it be used for sidewalks on Beech Street?

Answer – sidewalk program for homeowners; cannot use for vacant homes or lots

Romulus Public Hearing February 14, 2011

One resident, Ms. Dorothy Bird, 6299 Hunt Street, inquired how much money was allocated for senior services in regards to minor home repairs.

Ms. Lambert explained the breakdown of allocations for senior services to Ms. Bird and will follow up with her on more detail.

Institutional Structure

1. Describe actions taken during the last year to overcome gaps in institutional structures and enhance coordination.

CAPER Institutional Structure response:

Community Development programs in Wayne County including HOME and CDBG are administered by the Wayne County Community Development Division under the Economic Development Growth Engine. This division of Wayne County is responsible for the implementation of the annual Action Plan and the Consolidated Plan. The Community Development Division assists the 34 participating communities to meet community needs through the use of CDBG and HOME funds.

The Community Development Division also coordinates with the Advisory Council and local non-profit organizations. The Advisory Council, made up of elected officials from sub-recipient communities, grants extensions for the use of CDBG funds to fellow sub-recipients. The Council also provides input in the planning process. Wayne Metropolitan Community Action Agency (Wayne Metro CAA) performs housing rehabilitation services through the Wayne County CDBG Program in three of the County's sub-recipient communities. Services for Older Citizens (SOC), a non profit that operates in the Grosse Pointes and Harper Woods, provides housing rehabilitation, minor home repair, and a multitude of public services for area seniors.

In program year 2010 the County's administration and implementation of the CDBG program continued to use the third party administrator, Hennessey Engineers, Inc. In

compliance with federal regulations, Hennessey Engineers was procured through a bidding process that included six other responsive bidders. Hennessey was awarded the contract based on their experience with the participating communities, their capacity to carry out the scope of services as well as price. Included in Hennessey's scope of services, are the daily operations of CDBG and HOME as well as planning/preparing, pre-development, and monitoring. County Staff is directly responsible for project approval, budgeting, financial management, IDIS entry and recordkeeping.

Pertaining to CDBG, Hennessey's duties include but are not limited to; managing the Action and Consolidated Planning processes, coordinating and documenting CDBG Advisory Council meetings, reviewing applications and developing detailed activity budgets, ensuring eligibility of proposed CDBG activities, processing transfer of funds requests, providing technical assistance and training, financially reviewing subrecipient reimbursement requests, assisting with environmental clearance of activities, record keeping and filing, entering activity data into internal databases, and general administration of Wayne County/HUD policies and regulations.

EDGE and Hennessey have formed a seamless process for project approvals and voucher payments that includes staff from both entities. The addition of Hennessey Engineers has greatly increased EDGE's capacity to administer the CDBG and HOME programs as well as other programs, such as NSP and EECBG.

Monitoring

1. Describe how and the frequency with which you monitored your activities.
2. Describe the results of your monitoring including any improvements.
3. Self Evaluation
 - a. Describe the effect programs have in solving neighborhood and community problems.
 - b. Describe progress in meeting priority needs and specific objectives and help make community's vision of the future a reality.
 - c. Describe how you provided decent housing and a suitable living environment and expanded economic opportunity principally for low and moderate-income persons.
 - d. Indicate any activities falling behind schedule.
 - e. Describe how activities and strategies made an impact on identified needs.
 - f. Identify indicators that would best describe the results.
 - g. Identify barriers that had a negative impact on fulfilling the strategies and overall vision.
 - h. Identify whether major goals are on target and discuss reasons for those that are not on target.
 - i. Identify any adjustments or improvements to strategies and activities that might meet your needs more effectively.

Through cooperation with Hennessey Engineers, EDGE Community Development has strengthened its monitoring program significantly. EDGE Community Development has developed an extensive monitoring system to ensure that the activities carried out according to the Plan are done in a timely manner in accordance with all applicable laws, regulations, policies and sound management and accounting practices. Wayne County continues to enter into subrecipient agreements that contractually obligate grantees to comply with all applicable laws and regulations. The following is a protocol developed by the County and used to monitor the participating communities and non-profits.

Wayne County continually monitors progress of its housing and community development projects, along with its recipients and subrecipients of federal funds for compliance with Federal and County policies and procedures. Below is a summary of the monitoring process tailored to each of the federally funded programs.

Wayne County reports accomplishments in the Consolidated Annual Performance and Evaluation Report (CAPER). Accomplishments include how much money is spent, what is produced and to a certain extent, examinations of the relationships between the two.

The County began capturing performance measurement data from its 34 participating communities and two non-profits in program year 2006.

Community Development Block Grant

The Wayne County Community Development Program, the administrator for the CDBG program, has a multiple process for monitoring compliance and in the process of setting a year around rotation to ensure comprehensive monitoring.

Through a review of the community spending we identified Ecorse and Highland Park as two communities that need additional technical assistance and monitoring. To most effectively impact their programs we set up a schedule of one on one meetings and conference calls. These meetings and calls address the key compliance areas of procurement and labor standards, housing rehabilitation activities and well as other eligible activities that address the community greatest needs.

In conjunction with the above Wayne County has targeted required documentation for construction projects and payroll reimbursement of subrecipient staff. For construction projects subrecipients are required to submit copies of the bid solicitation and notification of public projects, Davis Bacon compliance, contract provision compliance and environmental compliance prior to the start of construction. Wayne County has prepared a memo for payroll reimbursement which outlines the documentation and eligibility required for reimbursement.

All subrecipients complete a semi-annual contract and subcontract activity report, reporting information regarding contractors used for CDBG funded projects – in September and March.

All subrecipients complete a quarterly program income report verifying program income receipts and communicate program expenditure activities.

This monitoring compliance is reinforced by regular contact with community representatives regarding administrative, programmatic and regulatory issues. Further, regularly scheduled subrecipient training, on-site technical assistance visits based on community requests and staff turnover, and programmatic review elements complement these monitoring efforts.

HOME Investment Partnerships (HOME) Program

Timeliness of Expenditures

Under the HOME Program regulations, entitlement funding must be expended within 60 months from the last day of the month in which HUD signed a HOME Partnership

Agreement. To track this performance indicator, Housing Division staff reviews expenditure reports on a regular basis. Additionally, individual projects are reviewed for drawdown activity. In an effort to keep new projects moving forward, performance deadlines are clearly stated in written agreements for all projects and programs.

Long-Term Compliance with Housing Codes

The Housing Division has taken great strides to ensure that the HOME Development and Loan Agreements provide clearly stated construction requirements and property maintenance. As a part of the due diligence process, grantees are required to submit all construction documents for review and approval before any funds are disbursed. Specific items include land surveys certified to Wayne County, final construction drawings and specifications, building permits, and all necessary insurance coverage's with the County named as an insured party. Furthermore, waivers of liens are required for all construction draws.

The HOME Agreement also affirms that the property meet and maintain all applicable local housing codes as well as HUD Housing Quality Standards, along with the right of the County to perform all necessary inspections throughout the Affordability period.

Long-Term Affordability Compliance

For homebuying assistance, the affordability requirements are secured with the property through a second mortgage under the recapture guidelines. The mortgage is secured as lien with the property. When the owner decides to sell the property, the lien is called up in the review of title. At that point, the owner must comply with the affordability requirements in order to sell the property. In light of changes to the region's housing market and mortgage industry dynamics, the HOME program has adopted a flexible, multi-tiered policy to recapture funds in and when net proceeds are available. Each transaction is assessed on a case-by-case basis and a reasonable payoff amount is determined based on the options allowed in 24CFR92.254 (a) 5ii.

For each rental housing development, a lien is placed with the property to secure the affordability requirements for the required length of time. In addition, the Community Development Division staff creates a monitoring plan designed to meet the HOME regulations that correspond to the particular characteristics of the project. Custom-made plans are important because certain characteristics such as the number of HOME-assisted units and new construction versus rehabilitation will dictate the length of time and frequency a project is monitored. Some of the HOME requirements that projects are monitored for include but are not limited to affordability, property standards, and income qualifications of the tenants. A database management system is used to track the periodic monitoring requirements of the HOME-assisted units throughout their affordability periods.

In addition, the Community Development Division staff conducts annual in-house audits of all grantees with projects and programs that are underway. After such review, a determination will be made whether an on-site monitoring review is necessary. This determination will be made based on prior findings that remain open, closed findings which need to be verified, outstanding independent audit findings, performance reporting issues, fiscal issues, and/or other appropriate areas that warrant additional monitoring.

If it is determined that an expanded monitoring review is necessary, staff shall conduct such a review. After completing this review, the results will be provided in writing to the grantee within 30 days. The monitoring review letter will outline concerns and/or findings resulting from the review, recommendations and/or corrective actions to resolve these issues, along with an anticipated timeframe for addressing them. If no findings or concerns are noted as a result of the monitoring review, the grantee will receive a letter stating such.

If concerns and/or findings are identified, the grantee must submit a written response within four weeks of receipt of the monitoring review letter. The response will be reviewed by staff to determine if the information provided or actions taken are adequate to clear the findings or concerns. Staff will continue to work with the grantee until all issues are resolved.

Program Year 2010

During the 2010 Program Year, Community Development Division staff continued its monitoring review schedule for HOME rental projects. A rental compliance survey is sent to the property management staff at HOME rental projects for completion. The completed survey, along with the necessary support documentation (income certifications, tenant leases, etc.), provides current information for the tenants at each HOME-assisted unit at the property. Community Development staff reviews the completed surveys and support documentation that are submitted to ensure compliance with all applicable HOME program requirements, such as income qualifications, rent limits, affirmative marketing, tenant lease requirements, etc.

In addition, during Program Year 2010, on-site visits were made to monitor the construction progress at several HOME projects that were underway, including Habitat for Humanity/Morningside, ML Sawicki, and First Step.

Emergency Shelter Grant (ESG) Program

The County requires monthly status reports from the operators of the Wayne County Family Center, of which all of the ESG funds are utilized, along with filing the Annual Progress Report for competitive homeless assistance programs. The County also performs periodic site visits. Lutheran Social Services of Michigan (LSSM) is reimbursed based on submission of monthly bills with back up documentation. Additionally, LSSM is required to submit an annual audit.

Lead-based Paint

1. Describe actions taken during the last year to evaluate and reduce lead-based paint hazards.

Programmatic guideline protection efforts will be expanded to include the new Environmental Protection Agency (EPA) 2010 Residential Rehabilitation Program (RRP) Lead-Based Paint Rule requirements. Multiple efforts have been undertaken to provide technical assistance to communities and increase inspector/consultant awareness of the compliance requirements of the 2010 RRP Lead-Based Paint Rule. Renovations will provide LBP prevention assistance proportional to the amount of CDBG funding assistance as required by the HUD1999 LSHR.

All persons participating in the Residential Rehabilitation Program receive information and copies of several different Lead-Based Paint brochures for compliance with the new EPA 2010 RRP Lead-Based Paint Rule. These brochures help explain and warn against the dangers of lead in the home.

CDBG Housing Rehab Program activities have the opportunity to share and leverage repair costs with other programs such as the LeadSafe Wayne program, weatherization programs, MSHDA loans and the MDCH Lead Abatement program. Homeowners can review the other program benefits, submit applications to these programs and discuss concerns on the amount of funds available, including the estimated amount of proposed renovations to benefit low-moderate income residents.

Technical assistance, access to LBP training and contractor Certified Renovator credentials regarding the EPA 2010 RRP Lead-Based Paint Rule is available to any community (persons, contractors, or inspectors requesting it.). As of April 22, 2010, federal law requires renovation firms (including sole proprietorships) to be certified and requires individuals to be trained in the use of lead-safe work practices.

The CDBG Housing Rehab Program follows the funding limits and requirements as presented by the HUD LBP Renovation Rules (LSHR) and the EPA regulations. As these standards are continually developed and incorporated into HUD's new standards they are addressed with each CDBG Housing Rehab project. All projects meet the 2009 Michigan Rehabilitation Code (or other statewide code rules and any local community adopted ordinance requirements).

Multiple efforts are underway to not only increase the awareness of lead-based paint hazards but also to protect occupants from current and future hazards. The two primary efforts to protect citizens from lead-based paint hazards are: 1) the protection of residents in federally subsidized housing; and 2) the prevention of childhood lead poisoning.

Since 2000, the U.S. Department of Housing and Urban Development (HUD) has implemented a "Lead Safe Housing Rule" regulation to protect young children from lead-based paint hazards in housing that is financially assisted by the federal government or being sold by the government. The requirements, in general terms, mandate that the level of protection afforded to an assisted household is directly proportional to the amount of assistance provided to the household (i.e., if a small amount of assistance is provided, a minimal protection effort should be made; conversely, if a large amount of assistance is provided, a greater level of protection is afforded). In Wayne County, the CDBG, HOME and ESG programs are incorporating the protection efforts into programmatic guidelines. These protection requirements complement, but do not overlap, the more substantial hazard elimination effort by the Wayne County Department of Public Health (DPH).

The Wayne County DPH has been directly dealing with the problem of lead-based paint in housing units over the past two decades. The County DPH has played an integral role in prevention, education, treatment and abatement. The goal of the Wayne County Lead Hazard Control Program (LHCP) is to reduce the dangers of lead poisoning, particularly to young children under the age of six (6).

Lead Education

If a child six (6) months through six (6) years is reported to have a blood lead level of 10-19 micograms per deciliter, then Wayne County will:

- Send a public health nurse to conduct a home visit to provide lead poisoning prevention information and physiological risk.

- Conduct a home assessment to identify lead dangers and provide lead hazard control options.
- Work with property owners to ensure that lead correction and abatement efforts are completed in a timely manner.

Case Management

If a child six (6) months through six (6) years is reported to have a blood lead level equal to or greater than 20 micrograms per deciliter, then Wayne County will:

- Provide a public health nurse to conduct a complete health and developmental assessment. The public health nurse monitors medical follow up to ensure that a child is tested.
- Provide an environmentalist to make a home visit to identify all sources of lead using proper equipment and systematic sampling procedures.
- Provide an environmentalist to provide information on temporary and permanent lead control options. An environmentalist works with homeowners and rental property owners to assure that correction and abatement activities are completed in a timely manner.

LeadSafe Wayne County is the name of the program that has provided assistance including community outreach, education and lead hazard abatement activities. Lead hazard abatement activities are provided to eligible landlords through a three-year forgivable loan. Home owners receive a grant as long as the home is not sold for three years. Properties are assessed to determine lead hazards and then plans are developed to address those hazards. Activities may include: window replacement, interior wall and ceiling repair, porch and siding repairs. Only areas that are lead hazards will be repaired or replaced. Requirements for program participation include:

child must be less than six (6) years of age (no age requirement if child has already been tested and found to have elevated blood lead levels); child must reside at the dwelling for minimum of 60 hours annually; dwelling was built before 1978; tenants/homeowners must be resident of Wayne County (outside of Detroit); tenants/homeowners must meet specific income guidelines.

Wayne County focuses its lead-based paint hazard reduction efforts in the communities of Highland Park and Hamtramck where elevated blood lead levels have been determined. The LeadSafe Wayne County Program is focused on reducing residential sources of lead poisoning through hazard remediation, community awareness, education and training, risk assessment, blood testing, temporary relocation services and related program services. The program involves partners from all segments of the community including local governments, health departments, independent contractors, volunteers, the medical community, and the owner/tenant recipients of the services.

HOUSING

Housing Needs

*Please also refer to the Housing Needs Table in the Needs.xls workbook.

1. Describe Actions taken during the last year to foster and maintain affordable housing.

It is well documented by now that Wayne County and southeast Michigan have been suffering twice the national average with home foreclosures. With its dependence on the struggling automobile companies this region is going the way of the manufacturing base. Needless to say, Wayne County government took action to help keep people in their homes and thus maintain affordable housing.

In February 2008, the CDBG Advisory Council adopted a resolution addressed to HUD. The resolution presented a statistical description of the home foreclosure crisis in Wayne County and concluded by recommending a number of measure aimed at loosening up federal regulations that guide the block grant program.

Mortgage Foreclosure Prevention Program

More significantly, the county has developed a Mortgage Foreclosure Prevention Program (MFPP). In partnership with United Way 2-1-1, the MFPP looks at the root cause of residents' problems and refers them to helpful resources free of charge. It has a toll free number and a web address that's been marketed in all of Wayne County's communities and townships and on local radio as public service announcements. No block grant dollars went into funding the MFPP. Private grant dollars and County general fund monies are the initial seed monies for the program.

MFPP Services

Education and Awareness

The MFPP organizes educational seminars to actively engage and educate citizens about the foreclosure process and its pitfalls. At no cost to the citizen, these seminars aim to create awareness of the mortgage foreclosure process and identify options from lenders, government and other financial institutions to assist the borrower in avoiding foreclosure. Additionally, the official MFPP website provides citizens tools to combat foreclosure crisis, including access to all educational materials, video presentations, and an online system designed to streamline the foreclosure case submission process.

Counseling

When receiving a foreclosure case for review, Wayne County provides targeted counseling to citizens aimed at mitigating foreclosure. Wayne County is also linked to a powerful Collaboration Network of HUD- and MSHDA-certified counseling agencies to analyze cases and recommend viable options to avoid mortgage foreclosure.

Intervention

Wayne County oversees the foreclosure case and serves as a soft mediator between the Collaboration Network, the borrower, and the lender to ensure that appropriate results are achieved.

Public Housing Strategy

1. Describe actions taken during the last year to improve public housing and resident initiatives.

There has been little direct action from the County to improve public housing, which largely operate autonomous to the County. Indirectly the County's housing programs are administered and prioritized in ways that help PHAs (like Ecorse and Hamtramck). In Ecorse alone, there has been several housing developments (41 mixed income townhouses along Salliotte Avenue, 37 units at the Miles Manor senior housing complex and 10 units at the Frenchman Cove) assisted by the County. We anticipate these developments to help in the continued stabilization of the city. As home values increase and vacancy rates reduce, the demand for public housing strengthens. Ideally, home ownership is the ultimate goal. The County's priority is to guide funding into the high needs communities like Ecorse and Hamtramck. In Hamtramck the Grand Haven and Dequindere scattered housing developments will begin to generate similar positive impacts for the city and its public housing.

The County has also provided technical assistance to PHAs looking to environmentally clear capital improvement projects. In particular, the County has assisted Melvindale Public Housing, Highland Park Public Housing and Inkster Public Housing. Helping them to facilitate the appropriate environmental documents speeds the capital improvement projects to the benefit of the residents.

Barriers to Affordable Housing

1. Describe actions taken during the last year to eliminate barriers to affordable housing.

Wayne County assisted 100 families and/or units by providing affordable housing opportunities during the reporting period of July 1, 2007 and June 30, 2008. All of these families and/or units met the U.S. Department of Housing and Urban Development's definition of assisted households/persons.

The Table 6 summarizes the affordable housing efforts directly administered by the County:

Table 6: Wayne County Assisted Households

Projects	Source of Funds	Funds Expended	Household / Units Assisted
Wayne County Urban County Program	HUD - CDBG	\$6,638,538.73	1,782 housing units
	Revolving Loan/Program Income	\$108,065.12	
Wayne County Family Center-Lutheran Social Services of Michigan	HUD - ESG	\$257,588.00	248 persons

First Step	HUD – CDBG	\$29,000.00	163 persons
Wayne County HOME Program	HUD – HOME Investment Partnership Program	\$3,383,162.00	101
	Match Carryforward	\$1,019,724.84	

Homeless

The Wayne County Family Center helped 248 homeless persons last year. First Step assisted 163 persons last year struggling with homelessness.

Owners

During PY 2009, between single-unit residential and multi-unit residential housing a total of 1,782 units were either completed or in the process of rehabilitation. Included in the 1,782 units is a number of single-unit residential that received minor home repairs rather than full rehabilitation.

The HOME Investment Partnership (HOME) program assisted 101 households this year.

Fair Housing Needs: Affirmatively Furthering Fair Housing

Through a partnership with the Fair Housing Center of Metropolitan Detroit (FHC), Wayne County continues to promote fair housing opportunities within the County's Community Development Block Grant (CDBG) jurisdiction. FHC provides a variety of fair housing programs including such activities as: fair housing counseling; assistance and referral services to low-income home seekers in locating subsidized housing or other suitable housing; landlord/tenant advice and referral services; mortgage pre-purchase and default counseling referral services; public information; education programs; and housing discrimination complaint reception, investigation and resolution services.

Wayne County continues to aggressively support fair housing practices in its participating communities. It continued the following actions in Program Year 2010 to address fair housing issues and practices:

- Worked with the Fair Housing Center and provided outreach and education to the general public and its participating communities through presentations and workshops.
- Supported collaborative efforts with community- and faith-based organizations to educate their constituencies.
- Used the Community Reinvestment Act to monitor the practices of local financial organizations.
- Maintained board membership on organizations, such as the Michigan Housing Trust Fund, Volunteers of America, and the Fannie Mae House Detroit Initiatives.

HOME Investment Partnerships (HOME) Program

1. Assessment of Relationship of HOME Funds to Goals and Objectives
 - a. Evaluate progress made toward meeting goals for providing affordable housing using HOME funds, including the number and types of households served.
2. HOME Match Report
 - a. Use HOME Match Report HUD-40107-A to report on match contributions for the period covered by the Consolidated Plan program year.
3. HOME MBE and WBE Report
 - a. Use Part III of HUD Form 40107 to report contracts and subcontracts with Minority Business Enterprises (MBEs) and Women's Business Enterprises (WBEs).
4. Assessments
 - a. Detail results of on-site inspections of rental housing.
 - b. Describe the HOME jurisdiction's affirmative marketing actions.
 - c. Describe outreach to minority and women owned businesses.

[Responses to these inquiries are found in previous sections.]

HOMELESS

Emergency Shelter Grants (ESG)

1. Identify actions to address emergency shelter and transitional housing needs of homeless individuals and families (including significant subpopulations such as those living on the streets).
2. Assessment of Relationship of ESG Funds to Goals and Objectives
 - a. Evaluate progress made in using ESG funds to address homeless and homeless prevention needs, goals, and specific objectives established in the Consolidated Plan.
 - b. Detail how ESG projects are related to implementation of comprehensive homeless planning strategy, including the number and types of individuals and persons in households served with ESG funds.
3. Matching Resources
 - a. Provide specific sources and amounts of new funding used to meet match as required by 42 USC 11375(a)(1), including cash resources, grants, and staff salaries, as well as in-kind contributions such as the value of a building or lease, donated materials, or volunteer time.
4. Activity and Beneficiary Data
 - a. Completion of attached Emergency Shelter Grant Program Performance Chart or other reports showing ESGP expenditures by type of activity. Also describe any problems in collecting, reporting, and evaluating the reliability of this information.
 - b. Homeless Discharge Coordination
 - i. As part of the government developing and implementing a homeless discharge coordination policy, ESG homeless prevention funds may be used to assist very-low income individuals and families at risk of becoming homeless after being released from publicly funded institutions such as health care facilities, foster care or other youth facilities, or corrections institutions or programs.
 - c. Explain how your government is instituting a homeless discharge coordination policy, and how ESG homeless prevention funds are being used in this effort.

Emergency Shelter Grant

PY 2010 ESG Funds Available:	\$257,588.00
PY 2010 ESG Funds Committed:	\$257,588.00
ESG Funds Expended in Program Year:	\$257,588.00
Cumulative ESG Funding Available (since program inception):	\$3,512,057.00
Cumulative ESG Funding Expended (since program inception):	\$3,512,057.00

GOALS ADDRESSED:

4) Homelessness...reduce homelessness through collaborating and integrating resources that address the special housing and service needs of homeless persons - many of whom have mental illness, substance dependence or abuse, and/or physical disabilities.

5) Suitable Living Environment...promote a high quality of life through activities that support the well-being of residents especially the elderly, the disabled, low-income persons and other persons with special needs.

Summary of Program Year 2010 Accomplishments for ESG

<u>Persons Assisted</u>	<u>248</u>
American Indian	0
Asian	0
Black	170
Black African American& White	2
Hispanic	2
Native Hawaiian or Other Pacific Islander	0
White	74

The Wayne County Family Center provides other services beyond shelter. They include childcare, transportation, outreach, health care and employment services.

The Wayne County Family Center utilized the following funding sources and in-kind contributions in fiscal year 2010. They were:

Wayne County CDBG	\$ 29,000.00
HUD	\$ 76,234.00
Other Federal Funds	\$209,965.00
State Government	\$106,010.00
Local Government	\$ 62,989.00
Private Funds	\$ 57,423.00
Other	<u>\$ 27,878.00</u>

COMMUNITY DEVELOPMENT

Community Development

*Please also refer to the Community Development Table in the Needs.xls workbook.

1. Assessment of Relationship of CDBG Funds to Goals and Objectives
 - a. Assess use of CDBG funds in relation to the priorities, needs, goals, and specific objectives in the Consolidated Plan, particularly the highest priority activities.
 - b. Evaluate progress made toward meeting goals for providing affordable housing using CDBG funds, including the number and types of households served.
 - c. Indicate the extent to which CDBG funds were used for activities that benefited extremely low-income, low-income, and moderate-income persons.

[Please refer to the Community Development Block Grant section on pgs 6-12.]

2. Changes in Program Objectives
 - a. Identify the nature of and the reasons for any changes in program objectives and how the jurisdiction would change its program as a result of its experiences.

[Not applicable]

3. Assessment of Efforts in Carrying Out Planned Actions
 - a. Indicate how grantee pursued all resources indicated in the Consolidated Plan.
 - b. Indicate how grantee provided certifications of consistency in a fair and impartial manner.
 - c. Indicate how grantee did not hinder Consolidated Plan implementation by action or willful inaction.

Wayne County pursued all the resources indicated in the 2007 Consolidated Plan. These resources included HUD formula grants as well as HOME match, NSP, Section 108 loans, BEDI, foreclosed properties for redevelopment, brownfield funds, EPA loans, DOE grants, SBA loans and more.

Wayne County provides policies and procedures that are explained in a manual and mandated in written agreements. More over the County's monitoring instruments are designed to capture data that would reveal unfair or partial grant implementation. These measures then ensure the grant is being carried out in ways consistent with HUD regulations.

The County does not adopt or support actions or willful inactions that do not support the Consolidated Plan.

4. For Funds Not Used for National Objectives
 - a. Indicate how use of CDBG funds did not meet national objectives.
 - b. Indicate how did not comply with overall benefit certification.

[Not applicable]

5. Anti-displacement and Relocation – for activities that involve acquisition, rehabilitation or demolition of occupied real property
 - a. Describe steps actually taken to minimize the amount of displacement resulting from the CDBG-assisted activities.

- b. Describe steps taken to identify households, businesses, farms or nonprofit organizations who occupied properties subject to the Uniform Relocation Act or Section 104(d) of the Housing and Community Development Act of 1974, as amended, and whether or not they were displaced, and the nature of their needs and preferences.
- c. Describe steps taken to ensure the timely issuance of information notices to displaced households, businesses, farms, or nonprofit organizations.

[Not applicable]

- 6. Low/Mod Job Activities – for economic development activities undertaken where jobs were made available but not taken by low- or moderate-income persons
 - a. Describe actions taken by grantee and businesses to ensure first consideration was or will be given to low/mod persons.
 - b. List by job title of all the permanent jobs created/retained and those that were made available to low/mod persons.
 - c. If any of jobs claimed as being available to low/mod persons require special skill, work experience, or education, provide a description of steps being taken or that will be taken to provide such skills, experience, or education.

[Not applicable]

- 7. Low/Mod Limited Clientele Activities – for activities not falling within one of the categories of presumed limited clientele low and moderate income benefit
 - a. Describe how the nature, location, or other information demonstrates the activities benefit a limited clientele at least 51% of whom are low- and moderate-income.

[Not applicable]

- 8. Program income received
 - a. Detail the amount of program income reported that was returned to each individual revolving fund, e.g., housing rehabilitation, economic development, or other type of revolving fund.
 - b. Detail the amount repaid on each float-funded activity.
 - c. Detail all other loan repayments broken down by the categories of housing rehabilitation, economic development, or other.
 - d. Detail the amount of income received from the sale of property by parcel.

[See attached summary detailing program income.]

- 9. Prior period adjustments – where reimbursement was made this reporting period for expenditures (made in previous reporting periods) that have been disallowed, provide the following information:
 - a. The activity name and number as shown in IDIS;
 - b. The program year(s) in which the expenditure(s) for the disallowed activity(ies) was reported;
 - c. The amount returned to line-of-credit or program account; and
 - d. Total amount to be reimbursed and the time period over which the reimbursement is to be made, if the reimbursement is made with multi-year payments.

[Not applicable]

10. Loans and other receivables

- a. List the principal balance for each float-funded activity outstanding as of the end of the reporting period and the date(s) by which the funds are expected to be received.
- b. List the total number of other loans outstanding and the principal balance owed as of the end of the reporting period.
- c. List separately the total number of outstanding loans that are deferred or forgivable, the principal balance owed as of the end of the reporting period, and the terms of the deferral or forgiveness.
- d. Detail the total number and amount of loans made with CDBG funds that have gone into default and for which the balance was forgiven or written off during the reporting period.
- e. Provide a List of the parcels of property owned by the grantee or its subrecipients that have been acquired or improved using CDBG funds and that are available for sale as of the end of the reporting period.

[Not applicable]

11. Lump sum agreements

- a. Provide the name of the financial institution.
- b. Provide the date the funds were deposited.
- c. Provide the date the use of funds commenced.
- d. Provide the percentage of funds disbursed within 180 days of deposit in the institution.

[Not applicable]

12. Housing Rehabilitation – for each type of rehabilitation program for which projects/units were reported as completed during the program year

- a. Identify the type of program and number of projects/units completed for each program.
- b. Provide the total CDBG funds involved in the program.
- c. Detail other public and private funds involved in the project.

[Please refer to CDBG program section pgs. 6-12]

OTHER NARRATIVE

Include any CAPER information that was not covered by narratives in any other section.

Impediments to Fair Housing

The need for decent, safe and affordable housing is universal to all people. Yet people who find housing that meets their needs may be denied occupancy for a number of reasons. Potential renters and buyers are sometimes turned away based on age, sex, health, family size, income levels, cultural heritage, or sexual preference. This is housing discrimination.

An analysis done some time ago of the housing conditions in Wayne County reveal: (1) the public sector has made efforts to incorporate fair housing standards in policies and

projects. Compliance with all federal regulations is the underlying goal of these efforts; (2) particular geographic areas of the County have a disproportionately high percentage of ethnic/racial minority residents. Though there is no documented evidence available to prove systemic "steering" or other discriminatory practices in the housing community to account for this broad historic trend, we know through the work of the Fair Housing Center of Metropolitan Detroit that discrimination cases do occur; and finally (3) advertising practices in the real estate community are consistent with fair housing regulations, and that other factors like credit history, lack of down payment and unfamiliarity of the mortgage process contribute to higher rate of mortgage denials among protected classes.

Through a 35-year partnership with the Fair Housing Center (FHC) of Metropolitan Detroit, Wayne County continues to promote fair housing opportunities within the Wayne County CDBG participating communities. FHC provides a variety of fair housing programs including such activities as:

- Fair housing counseling,
- Referral assistance programs,
- Housing discrimination complaint reception,
- Investigation and resolution services and the provision of advice,
- Counsel and referral services for other housing related inquiries,
- Fair housing public information services,
- Publication and distribution of the Fair Housing News,
- Distribution of the Housing Assistance Guide for Wayne County,
- Provision of other fair housing information to individuals and groups from Wayne County CDBG communities.

The variety of fair housing programs provided by FHC address many of the impediments to fair housing discussed above.

Between July 1, 2010 and June 30, 2011, there were 75 active FHC cases in the CDBG Wayne County communities. Fifty-nine cases were carry-over cases from previous years and 16 were new. Of 75 active cases in FHCMD files during 2010/11 program year the vast majority (52 or 69%) involved allegations of discrimination based on "race". "Disability status" was the next most frequent basis of complaints (20), followed by : "familial status" (5); "national origin" (4); "sex (4); "age" (4) "marital status" (2). Many cases involved complaints of multiple categories of discrimination.

According to the FHC report, 50.6 percent of the complaints (38) involved rental transactions. A very important service FHC provides is the testing of complaints within the Wayne County CDBG participating communities. A total of 34 of the cases were tested, with several complaints tested multiple times by FHC. Testers found that approximately 26 percent of the tested-cases disclosed evidence of differences in treatment that supported the discrimination claim.

The 16 new discrimination complaints involving properties in Wayne County CDBG communities filed with FHC 2010/2011 program year is consistent with the average number (17) of new Wayne County CDBG based complaints received during the 35 years the FHC/Wayne County program has been in place.

In addition to the aforementioned testing and results, FHC provides services to individuals or families who either contact FHC or are referred from Wayne County or any of the CDBG participating communities. In more detail, they include:

- General advice and counsel on all housing related issues, and accurate information on the types of housing services available to all persons, including protected group persons and lower-income residents of Wayne County and the entire metro area;
- Assistance and referral services to home seekers in locating subsidized or other suitable and affordable housing;
- Landlord/tenant advice and referral services;
- Mortgage pre-purchase and default counseling and referral services.

Of the estimated 700 initial contacts received by the FHC between July 1, 2010 and June 30, 2011, approximately 80 percent (560) involved one of the four above-mentioned services. The majority of the calls were landlord/tenant problems. In those instances where FHC has not been able to immediately provide the information requested, a referral was made to one of several agencies funded to provide assistance in those areas. Some of the agencies include United Community Housing Coalition and the Detroit Profit

More generally, revising local planning and zoning laws can help eliminate the impediments to fair housing. Local ordinances should be reviewed by watchdog groups in the context of fair housing issues. Where there are ordinances or language on the books that impede fair housing choices, they should be revised. Wayne County CDBG and HOME have a robust housing rehabilitation and new construction program (see previous sections for the data) that repairs and builds housing units for low- to moderate-income persons. Finally, the County's home-buyers assistance programs have helped low- to moderate-income persons (including classes protected under the Fair Housing Act) to realize home ownership through credit and mortgage counseling classes and direct financial assistance.

2010 Program Income Receipt Report for IDIS

Community	Activity	Amount Expended	IDIS Drawdown #	Contract No.	IDIS No.
Brownstown Twp	Housing Rehab	\$4,316.00	5331864	10-03-14A 02 RL	2863
Inkster	Housing Rehab	\$8,181.62	5331865	08-37-14A-02 RL	3010
Romulus	Housing Rehab	\$3,036.00	5331870	10-24-14A 02 RI	2942
Southgate	Housing Rehab	\$9,003.00	5331866	10-27-14A 02 RL	3235
Trenton	Housing Rehab	\$38,072.49	5331871	10-29-14A 02 RL	3461
Wayne	Housing Rehab	\$21,386.29	5331869	10-31-14A 02 RL	3238
Wyandotte	Housing Rehab	\$14,424.90	5331873	10-34-14A 02 RL	2997
	SUBTOTAL Revolving Loan	\$98,420.30		10-RL-14A 02	
Melvindale	Housing Rehab	\$5,633.02	5331874	10-18-21A	2919
Wyandotte	Administration	\$4,011.80	5331881	10-34-21A	2997
	SUBTOTAL PROGRAM INCOME	\$9,644.82		10-PI	
	Total	\$108,065.12			

IDIS

U.S. DEPARTMENT OF HOUSING AND
URBAN DEVELOPMENT
OFFICE OF COMMUNITY PLANNING AND
DEVELOPMENT
PR 26 - CDBG Financial Summary Report

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Grantee	WAYNE COUNTY , MI
Program Year	2010
PART I: SUMMARY OF CDBG RESOURCES	
01 UNEXPENDED CDBG FUNDS AT END OF PREVIOUS PROGRAM YEAR	12,070,154.09
02 ENTITLEMENT GRANT	6,614,451.00
03 SURPLUS URBAN RENEWAL	0.00
04 SECTION 108 GUARANTEED LOAN FUNDS	0.00
05 CURRENT YEAR PROGRAM INCOME	204,526.15
06 RETURNS	0.00
07 ADJUSTMENT TO COMPUTE TOTAL AVAILABLE	(96,461.03)
08 TOTAL AVAILABLE (SUM, LINES 01-07)	18,792,670.21
PART II: SUMMARY OF CDBG EXPENDITURES	
09 DISBURSEMENTS OTHER THAN SECTION 108 REPAYMENTS AND PLANNING/ADMINISTRATION	5,036,351.44
10 ADJUSTMENT TO COMPUTE TOTAL AMOUNT SUBJECT TO LOW/MOD BENEFIT	0.00
11 AMOUNT SUBJECT TO LOW/MOD BENEFIT (LINE 09 + LINE 10)	5,036,351.44
12 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	1,405,684.09
13 DISBURSED IN IDIS FOR SECTION 108 REPAYMENTS	196,503.20
14 ADJUSTMENT TO COMPUTE TOTAL EXPENDITURES	0.00
15 TOTAL EXPENDITURES (SUM, LINES 11-14)	6,638,538.73
16 UNEXPENDED BALANCE (LINE 08 - LINE 15)	12,154,131.48
PART III: LOW/MOD BENEFIT THIS REPORTING PERIOD	
17 EXPENDED FOR LOW/MOD HOUSING IN SPECIAL AREAS	0.00
18 EXPENDED FOR LOW/MOD MULTI-UNIT HOUSING	0.00
19 DISBURSED FOR OTHER LOW/MOD ACTIVITIES	4,588,034.70
20 ADJUSTMENT TO COMPUTE TOTAL LOW/MOD CREDIT	0.00
21 TOTAL LOW/MOD CREDIT (SUM, LINES 17-20)	4,588,034.70
22 PERCENT LOW/MOD CREDIT (LINE 21/LINE 11)	91.10%
LOW/MOD BENEFIT FOR MULTI-YEAR CERTIFICATIONS	
23 PROGRAM YEARS(PY) COVERED IN CERTIFICATION	PY: 2008 PY: 2009 PY: 2010
24 CUMULATIVE NET EXPENDITURES SUBJECT TO LOW/MOD BENEFIT CALCULATION	13,379,616.40
25 CUMULATIVE EXPENDITURES BENEFITING LOW/MOD PERSONS	12,264,070.82
26 PERCENT BENEFIT TO LOW/MOD PERSONS (LINE 25/LINE 24)	91.66%
PART IV: PUBLIC SERVICE (PS) CAP CALCULATIONS	
27 DISBURSED IN IDIS FOR PUBLIC SERVICES	524,444.89
28 PS UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR	488,634.69
29 PS UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR	408,801.94
30 ADJUSTMENT TO COMPUTE TOTAL PS OBLIGATIONS	0.00
31 TOTAL PS OBLIGATIONS (LINE 27 + LINE 28 - LINE 29 + LINE 30)	604,277.64
32 ENTITLEMENT GRANT	6,614,451.00
33 PRIOR YEAR PROGRAM INCOME	437,975.23
34 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PS CAP	0.00
35 TOTAL SUBJECT TO PS CAP (SUM, LINES 32-34)	7,052,426.23
36 PERCENT FUNDS OBLIGATED FOR PS ACTIVITIES (LINE 31/LINE 35)	8.57%
PART V: PLANNING AND ADMINISTRATION (PA) CAP	
37 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	1,405,684.09
38 PA UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR	942,561.59

IDIS

U.S. DEPARTMENT OF HOUSING AND
URBAN DEVELOPMENT
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39 PA UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR	1,037,664.27
40 ADJUSTMENT TO COMPUTE TOTAL PA OBLIGATIONS	0.00
41 TOTAL PA OBLIGATIONS (LINE 37 + LINE 38 - LINE 39 +LINE 40)	1,310,581.41
42 ENTITLEMENT GRANT	6,614,451.00
43 CURRENT YEAR PROGRAM INCOME	204,526.15
44 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PA CAP	(96,461.03)
45 TOTAL SUBJECT TO PA CAP (SUM, LINES 42-44)	6,722,516.12
46 PERCENT FUNDS OBLIGATED FOR PA ACTIVITIES (LINE 41/LINE 45)	19.50%

Public reporting burden for this collection of information is estimated to average 45 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless that collection displays a valid OMB control number.

The HOME statute imposes a significant number of data collection and reporting requirements. This includes information on assisted properties, on the owners or tenants of the properties, and on other programmatic areas. The information will be used: 1) to assist HOME participants in managing their programs; 2) to track performance of participants in meeting fund commitment and expenditure deadlines; 3) to permit HUD to determine whether each participant meets the HOME statutory income targeting and affordability requirements; and 4) to permit HUD to determine compliance with other statutory and regulatory program requirements. This data collection is authorized under Title II of the Cranston-Gonzalez National Affordable Housing Act or related authorities. Access to Federal grant funds is contingent on the reporting of certain project-specific data elements. Records of information collected will be maintained by the recipients of the assistance. Information on activities and expenditures of grant funds is public information and is generally available for disclosure. Recipients are responsible for ensuring confidentiality when public disclosure is not required.

Instructions for the HOME Match Report

Applicability:

The HOME Match Report is part of the HOME APR and must be filled out by every participating jurisdiction that incurred a match liability. Match liability occurs when FY 1993 funds (or subsequent year funds) are drawn down from the U.S. Treasury for HOME projects. A Participating Jurisdiction (PJ) may start counting match contributions as of the beginning of Federal Fiscal Year 1993 (October 1, 1992). A jurisdiction not required to submit this report, either because it did not incur any match or because it had a full match reduction, may submit a HOME Match Report if it wishes. The match would count as excess match that is carried over to subsequent years. The match reported on this form must have been contributed during the reporting period (between October 1 and September 30).

Timing:

This form is to be submitted as part of the HOME APR on or before December 31. The original is sent to the HUD Field Office. One copy is sent to the

Office of Affordable Housing Programs, CGHF
Room 7176, HUD, 451 7th Street, S.W.
Washington, D.C. 20410.

The participating jurisdiction also keeps a copy.

Instructions for Part II:

1. **Excess match from prior Federal fiscal year:** Excess match carried over from prior Federal fiscal year.
2. **Match contributed during current Federal fiscal year:** The total amount of match contributions for all projects listed under Part III in column 9 for the Federal fiscal year.

3. **Total match available for current Federal fiscal year:** The sum of excess match carried over from the prior Federal fiscal year (Part II, line 1) and the total match contribution for the current Federal fiscal year (Part II, line 2). This sum is the total match available for the Federal fiscal year.
4. **Match liability for current Federal fiscal year:** The amount of match liability is available from HUD and is provided periodically to PJs. The match must be provided in the current year. The amount of match that must be provided is based on the amount of HOME funds drawn from the U.S. Treasury for HOME projects. The amount of match required equals 25% of the amount drawn down for HOME projects during the Federal fiscal year. Excess match may be carried over and used to meet match liability for subsequent years (see Part II line 5). Funds drawn down for administrative costs, CHDO operating expenses, and CHDO capacity building do not have to be matched. Funds drawn down for CHDO seed money and/or technical assistance loans do not have to be matched if the project does not go forward. A jurisdiction is allowed to get a partial reduction (50%) of match if it meets one of two statutory distress criteria, indicating "fiscal distress," or else a full reduction (100%) of match if it meets both criteria, indicating "severe fiscal distress."

The two criteria are poverty rate (must be equal to or greater than 125% of the average national family poverty rate to qualify for a reduction) and per capita income (must be less than 75% of the national average per capita income to qualify for a reduction). In addition, a jurisdiction can get a full reduction if it is declared a disaster area under the Robert T. Stafford Disaster Relief and Emergency Act.

5. **Excess match carried over to next Federal fiscal year:** The total match available for the current Federal fiscal year (Part II, line 3) minus the match liability for the current Federal fiscal year (Part II, line 4). Excess match may be carried over and applied to future HOME project match liability.

Instructions for Part III:

1. **Project No. or Other ID: "Project number"** is assigned by the C/MI System when the PJ makes a project setup call. These projects involve at least some Treasury funds. If the HOME project does not involve Treasury funds, it must be identified with "other ID" as follows: the fiscal year (last two digits only), followed by a number (starting from "01" for the first non-Treasury-funded project of the fiscal year), and then at least one of the following abbreviations: "SF" for project using shortfall funds, "PJ" for projects using program income, and "NON" for non-HOME-assisted affordable housing. Example: 93.01.SF, 93.02.PJ, 93.03.NON, etc.

Shortfall funds are non-HOME funds used to make up the difference between the participation threshold and the amount of HOME funds allocated to the PJ; the participation threshold requirement applies only in the PJ's first year of eligibility. [§92.102]

Program income (also called "repayment income") is any return on the investment of HOME funds. This income must be deposited in the jurisdiction's HOME account to be used for HOME projects. [§92.503(b)]

Non-HOME-assisted affordable housing is investment in housing not assisted by HOME funds that would qualify as "affordable housing" under the HOME Program definitions. "NON" funds must be contributed to a specific project; it is not sufficient to make a contribution to an entity engaged in developing affordable housing. [§92.219(b)]

2. **Date of Contribution:** Enter the date of contribution. Multiple entries may be made on a single line as long as the contributions were made during the current fiscal year. In such cases, if the contributions were made at different dates during the year, enter the date of the last contribution.

3. **Cash:** Cash contributions from non-Federal resources. This means the funds are contributed permanently to the HOME Program regardless of the form of investment the jurisdiction provides to a project. Therefore all repayment, interest, or other return on investment of the contribution must be deposited in the PJ's HOME account to be used for HOME projects. The PJ, non-Federal public entities (State/local governments), private entities, and individuals can make contributions. The grant equivalent of a below-market interest rate loan to the project is eligible when the loan is not repayable to the PJ's HOME account. [§92.220(a)(1)] In addition, a cash contribution can count as match if it is used for eligible costs defined under §92.206 (except administrative costs and CHDO operating expenses) or under §92.209, or for the following non-eligible costs: the value of non-Federal funds used to remove and relocate ECHO units to accommodate eligible tenants, a project reserve account for re-placements, a project reserve account for unanticipated increases in operating costs, operating subsidies, or costs relating to the portion of a mixed-income or mixed-use project not related to the affordable housing units. [§92.219(c)]

4. **Foregone Taxes, Fees, Charges:** Taxes, fees, and charges that are normally and customarily charged but have been waived, foregone, or deferred in a manner that achieves affordability of the HOME-assisted housing. This includes State tax credits for low-income housing development. The amount of real estate taxes may be based on the

post-improvement property value. For those taxes, fees, or charges given for future years, the value is the present discounted cash value. [§92.220(a)(2)]

5. **Appraised Land/Real Property:** The appraised value, before the HOME assistance is provided and minus any debt burden, lien, or other encumbrance, of land or other real property, not acquired with Federal resources. The appraisal must be made by an independent, certified appraiser. [§92.220(a)(3)]

6. **Required Infrastructure:** The cost of investment, not made with Federal resources, in on-site and off-site infrastructure directly required for HOME-assisted affordable housing. The infrastructure must have been completed no earlier than 12 months before HOME funds were committed. [§92.220(a)(4)]

7. **Site preparation, Construction materials, Donated labor:** The reasonable value of any site-preparation and construction materials, not acquired with Federal resources, and any donated or voluntary labor (see §92.354(b)) in connection with the site-preparation for, or construction or rehabilitation of, affordable housing. The value of site-preparation and construction materials is determined in accordance with the PJ's cost estimate procedures. The value of donated or voluntary labor is determined by a single rate ("labor rate") to be published annually in the Notice Of Funding Availability (NOFA) for the HOME Program. [§92.220(6)]

8. **Bond Financing:** Multifamily and single-family project bond financing must be validly issued by a State or local government (or an agency, instrumentality, or political subdivision thereof). 50% of a loan from bond proceeds made to a multifamily affordable housing project owner can count as match. 25% of a loan from bond proceeds made to a single-family affordable housing project owner can count as match. Loans from all bond proceeds, including excess bond match from prior years, may not exceed 25% of a PJ's total annual match contribution. [§92.220(a)(5)] The amount in excess of the 25% cap for bonds may carry over, and the excess will count as part of the statutory limit of up to 25% per year. Requirements regarding

bond financing as an eligible source of match will be available upon publication of the implementing regulation early in FY 1994.

9. **Total Match:** Total of items 3 through 8. This is the total match contribution for each project identified in item 1.

Ineligible forms of match include:

1. Contributions made with or derived from Federal resources e.g. CDBG funds [§92.220(b)(1)]
2. Interest rate subsidy attributable to the Federal tax exemption on financing or the value attributable to Federal tax credits [§92.220(b)(2)]
3. Contributions from builders, contractors or investors, including owner equity, involved with HOME-assisted projects. [§92.220(b)(3)]
4. Sweat equity [§92.220(b)(4)]
5. Contributions from applicants/recipients of HOME assistance [§92.220(b)(5)]
6. Fees/charges that are associated with the HOME Program only, rather than normally and customarily charged on all transactions or projects [§92.220(a)(2)]
7. Administrative costs

U.S. Department of Housing and Urban Development
Office of Community Planning and Development
Integrated Disbursement and Information System
ESG Program Financial Summary
For Fiscal Year : 2010
WAYNE COUNTY,MI

Grantee Name	Grant Amount	Committed Amount	Disbursed Amount
WAYNE COUNTY, MI	\$257,588.00	\$257,588.00	\$257,588.00
Total for DETROIT :	\$257,588.00	\$257,588.00	\$257,588.00
Total for ESG Program :	\$257,588.00	\$257,588.00	\$257,588.00