

# HUD Consolidated Plan



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The Mayor and City Council play a pivotal role in the preparation and implementation of the HUD Consolidated Plan. The Plan is a vital segment of Detroit's economic and social services network. Knowledge of how these processes and programs work is essential to maximizing their impact.

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# HUD Consolidated Plan

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In 1995, HUD created the Consolidated Plan to serve as the planning document (comprehensive housing affordability strategy and community development plan) of state or local grantee governments and to support their applications for funding under any of the Community Planning and Development formula grant programs:

- [Community Development Block Grant \(CDBG\) Program](#)
- [HOME Investment Partnerships \(HOME\) Program](#)
- [Emergency Solutions Grant \(ESG\) Program](#)
- [Housing Opportunities for Persons With AIDS \(HOPWA\) Program](#).

24 CFR Part 91 contains the regulations that set forth the Consolidated Plan submission requirements. See **Appendix A** for additional information on the HUD Consolidated Plan.

## Consolidated Plan Process, Grant Programs, and Related HUD Programs

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### Consolidated Plan Process

The Consolidated Plan is designed to help states and local jurisdictions to assess their affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions.

- **Consultation and Citizen Participation.** Through the Consolidated Plan (often called the “Con Plan”), grantee jurisdictions engage the community, both in the process of developing and reviewing the proposed plan, and as partners and stakeholders in the implementation of HUD programs. By consulting and collaborating with other public and private entities, grantees can align and coordinate community development programs with a range of other plans, programs and resources to achieve greater impact.
- **The Consolidated Plan.** The Consolidated Plan, which may have a duration of between 3 and 5 years, describes the jurisdiction’s community development priorities and multiyear goals based on an assessment of housing and community development needs, an analysis of housing and economic market conditions and available resources.

(Refer to **Appendix A** for detail on the Consolidated Plan)

- **The Annual Action Plan.** The Consolidated Plan is carried out through Annual Action Plans, which provide a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan.

(Refer to **Appendix B** for detail on the Annual Action Plan)

- Consolidated Annual Performance and Evaluation Report (CAPER). In the CAPER, grantees report on accomplishments and progress toward Consolidated Plan goals in the prior year.

## Consolidated Plan Programs

The consolidated planning process serves as the framework for a community-wide dialogue to identify housing and community development priorities that align and focus funding from the four CPD formula block grant programs:

- [CDBG: Community Development Block Grant Program](#)
- [HOME: HOME Investment Partnerships Program](#)
- [ESG: Emergency Solutions Grants Program](#)
- [HOPWA: Housing Opportunities for Persons with AIDS Program](#)

(Refer to **Appendix C** for HUD Consolidated Plan program descriptions and funding over the last five years)

## Grantee Types

### Local Jurisdictions

Units of local government must submit a 3 to 5 year Consolidated Plan and Annual Action Plans. Annual Action Plans should describe specific projects to be funded. [See 24 CFR Part 91, Subpart D](#). **Detroit is a local jurisdiction (also known as a “Grantee”).**

### States

State governments must also submit a 3 to 5 year Consolidated Plan and Annual Action Plans. However, rather than describing specific projects to be funded, a State’s Annual Action Plan must specify its method of distributing funds to eligible units of local government and nonprofits, or the activities to be undertaken by the state-run programs in the coming year. [See 24 CFR Part 91, Subpart D](#). **The State of Michigan is an example.**

### Consortia

Units of local government that participate in a HOME Consortium must participate in submission of a Consolidated Plan for the consortium, which addresses the housing elements of the Consolidated Plan. The plan must also describe the non-housing community development plans of all CDBG entitlement communities that are members of a consortium. [See 24 CFR Part 91, Subpart E](#). **Wayne County is an example.**

## HUD Programs and Requirements Related to Consolidated Planning

**Office of Fair Housing:** As part of the Consolidated Plan, all grantees must certify that they will affirmatively further fair housing, which means conducting an Analysis of Impediments to Fair Housing Choice (AI), taking appropriate actions to overcome the effects of any impediments

identified through that analysis, and keeping records of these actions. The [Fair Housing Planning Guide](#) provides guides to grantees preparing their AI.

[Public Housing Program](#)<sup>1</sup>: The Consolidated Plan regulations require grantees to create strategies to address the needs of public housing residents. The [PHA Plan](#) is a comprehensive guide to PHA policies, programs, operations, and strategies for meeting local housing needs and goals.

## Consolidated Plan Regulations and Federal Register Notices

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### [24 CFR Part 91](#)

Date Published: February 2006

### [24 CFR Part 91 as amended by the ESG Interim Rule and Homeless Definition Final Rule](#)

Date Published: December 2011

### [ESG Interim Rule](#)

Date Published: December 2011

## Certifications and SF 424

The Consolidated Plan regulations require grantees to complete and submit the SF-424 (the standard cover sheet for federal applications and pre-applications), as well as the appropriate certifications (state or non-state).

### [Non-State Certifications \(applies to Detroit\)](#)

### [State Certifications \(does not apply to Detroit\)](#)

### [SF-424 \(applies to Detroit\)](#)

## Notices

The notices listed below advise grantees on modifications in programs and regulations.

### [Consolidated Plan Notice](#)

This Notice describes changes to the Consolidated Plan, within current statutory and regulatory provisions, for a new process for electronic submission. It includes a required template and other improvements, as well as HUD's transition plan for implementation.

Date Published: April 2012

### [ESG Substantial Amendment Process](#)

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<sup>1</sup> The Detroit Housing Commission handles public housing in Detroit.

This Notice advises ESG grantees on the Consolidated Plan amendment process resulting from the HEARTH Act<sup>2</sup>.

Date Published: January 2012

[2006 Performance Measurement Notice](#)

This Notice advises grantees on the implementation of outcome measurement for activities conducted under CPD's block grant programs.

Date Published: March 2006

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<sup>2</sup> The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009.

## Appendix A

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# Consolidated Plan (Five Year Plan)

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The U.S. Department of Housing and Urban Development (HUD) Consolidated Plan is a collaborative process to establish a unified vision for community development actions. The purpose of the plan is to provide a comprehensive vision of housing and community development, including:

- affordable housing
- adequate infrastructure
- fair housing
- protection of the environment
- enhancement of civic design and vigorous economic growth
- coordinated with human development.

The plan is also designed to improve program accountability and support results oriented management; to generate citizen involvement; and to include the needs and resources of public housing.

The Consolidated Plan includes a Five-year strategy and five annual plans implementing the strategy.

Over the next five-year period (2015-2020) the Consolidated Plan will:

- Document Current Conditions within the City of Detroit
- Determine and document needs within the City of Detroit
- Estimate Available Resources
- Lay out strategies to meet community development needs
- Establish Goals and Priorities (to meet needs with available resources)

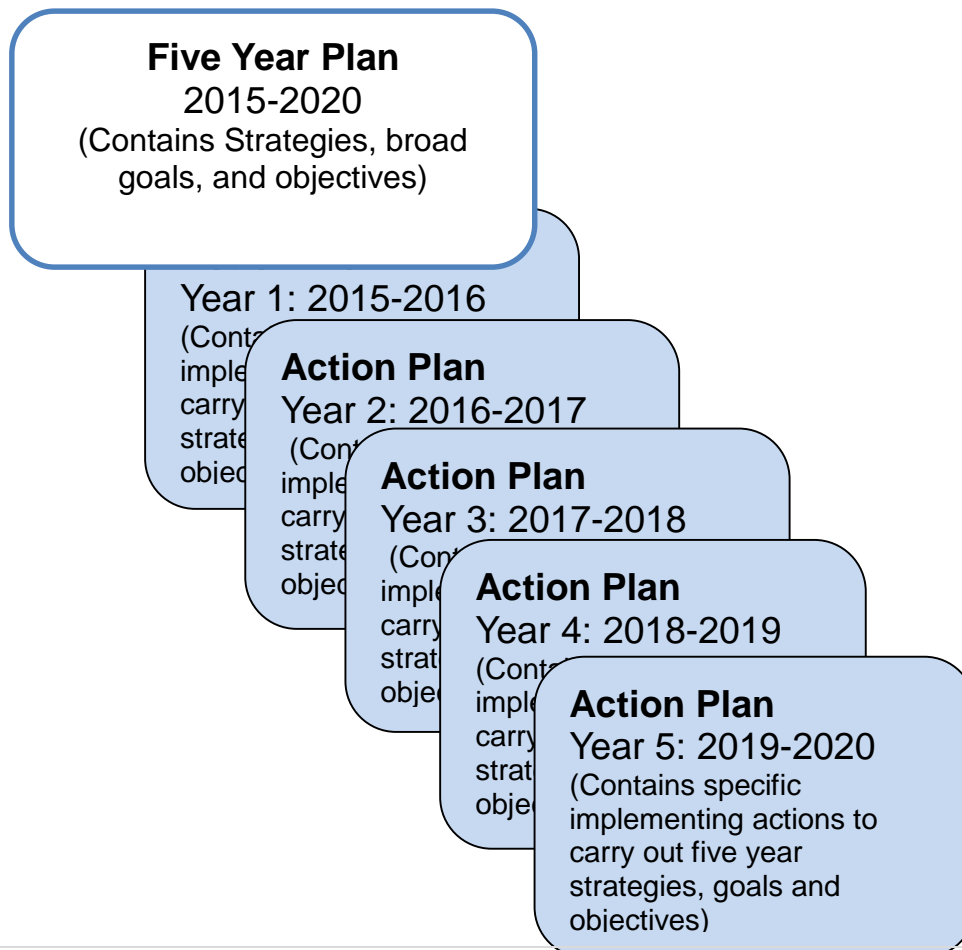
Grantees report on accomplishments and progress toward Consolidated Plan goals in the Consolidated Annual Performance and Evaluation Report (CAPER).

# Annual Action Plan

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The Consolidated Plan is implemented through Annual Action Plans, which provide a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan (includes funding allocations). The Annual Action Plan:

- Implements five-year strategy with funding received annually over a five-year period
- Allocates annual funding from HUD for:
  - Community Development Block Grant (CDBG)
  - Emergency Solutions Grant (ESG)
  - HOME Investment Partnership Act
  - Housing Opportunities for Persons With AIDS (HOPWA)
- Discusses other resources available to Detroit



Grantees report on accomplishments and progress toward Consolidated Plan goals in the Consolidated Annual Performance and Evaluation Report (CAPER).



## Appendix C

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# Consolidated Plan Programs

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### **COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM** (24 CFR part 570)

The CDBG program is a federal program operated by the U.S. Department of Housing and Urban Development. It Provides entitlement grants to local entities for community development activities.

The grant amount is determined by formula and varies from year to year according to the amount appropriated nationally by the U.S. Congress.

The program objective is the development of viable communities by providing decent housing, a suitable living environment, and expanded economic opportunities. Funding allocations for the most recent five years are shown below:

<b>Year</b>	<b>Entitlement Grant</b>	<b>Program Income</b>	<b>Total</b>
2012-13	33,353,509	300,000	33,653,509
2013-14	32,877,085	310,000	33,187,085
2014-15	32,109,171	310,000	32,419,171
2015-16	31,530,048	0	31,530,048
<b>2016-17</b>	<b>31,372,385</b>	<b>0</b>	<b>31,372,385</b>

CDBG activities are controlled by the local grantee. However, each activity must adhere to a seven step process that assures it meets HUD requirements, as shown below:

1. Is the activity eligible per 24CFR part 570.201 to 24CFR part 570.206?
2. Is the activity ineligible per 24CFR part 570.207?
3. Will the activity meet a national objective per 24CFR part 570.208?
4. Will the activity comply with the 70 percent test per 24CFR part 570.200(a)(3)?

5. Are costs reasonable<sup>3</sup>?
6. Will the activity meet an objective of the Consolidated Plan?
7. Are all other necessary reviews/requirements completed and clearance obtained (if needed) for example, Environmental Review/Clearance.

## ***HOME INVESTMENT PARTNERSHIPS (HOME) PROGRAM***

(24 CFR part 92)

- The Home Investment Partnerships (HOME) program is a Federal program operated by the U.S. Department of Housing and Urban Development.
- This program provides grants to cities and others to increase the supply of safe and affordable rental and ownership housing for low-income families.
- The grant amount is determined by formula and varies from year to year according to the amount appropriated nationally by the U.S. Congress.
- Grant funds may be used to acquire, rehabilitate or construct affordable housing and to provide tenant based rental assistance.

Funding amounts received by the City for the most recent five years are shown below:

<b>Year</b>	<b>HOME Entitlement Grant</b>
2012-13	5,823,346
2013-14	4,351,209
2014-15	4,698,558
2015-16	4,069,260
<b>2016-17</b>	<b>4,752,103</b>

<sup>3</sup>Reasonable cost: a cost that in its amount and nature, is consistent with what a reasonable person would incur in the conduct of the same business in the same or similar circumstances.

# **EMERGENCY SOLUTIONS GRANTS (ESG) PROGRAM**

(24 CFR part 576)

The Emergency Solutions Grant (ESG) program is a Federal program operated by the U.S. Department of Housing and Urban Development. The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) amended the Emergency Shelter Grants Program (McKinney-Vento Homeless Assistance Act). The HEARTH Act revised the Emergency Shelter Grants Program in significant ways and renamed it the Emergency Solutions Grants (ESG) program. The ESG Interim Rule took effect on January 4, 2012.

ESG funds may be used for five program components:

- street outreach
- emergency shelter
- homelessness prevention
- rapid re-housing assistance
- Homeless Management Information Systems (HMIS)
- administrative activities (up to 7.5% of a recipient's allocation can be used for administrative activities).

The grant amount is determined by formula and varies from year to year according to the amount appropriated nationally by the U.S. Congress.

Funding amounts received by the City for the most recent five years are shown below:

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<b>Year</b>	<b>ESG Entitlement Grant</b>
2012-13	2,903,719
2013-14	2,433,238
2014-15	2,670,892
2015-16	2,862,103
<b>2016-17</b>	<b>2,838,335</b>

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**HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS (HOPWA)  
PROGRAM**  
(24 CFR part 574)

- The Housing Opportunities For Persons With AIDS (HOPWA) program is a Federal program operated by the U.S. Department of Housing and Urban Development.
- This program provides grants to large cities with over 1500 AIDS cases. Program funds are designed to meet housing and related service needs of people with HIV/AIDS and their families.
- The program covers Wayne County (including Detroit).
- The grant amount is determined by formula and varies from year to year according to the amount appropriated nationally by the U.S. Congress.

Funding amounts received by the City for the most recent five years are shown below:

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<b>Year</b>	<b>HOPWA Entitlement Grant</b>
2012-13	2,200,845
2013-14	1,978,226
2014-15	2,351,114
2015-16	2,460,771
<b>2016-17</b>	<b>2,695,671</b>

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