



2025-2029 5-YEAR CONSOLIDATED ANNUAL ACTION PLAN

CITY OF DETROIT



CITY OF DETROIT

FY 2025-2029 CONSOLIDATED PLAN & FY 2025-2026 ANNUAL ACTION PLAN

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Executive Summary

ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

As an “entitlement” jurisdiction, the City of Detroit (the “City”) receives formula grant funds from the U.S. Department of Housing and Urban Development (HUD) and is required to submit a Consolidated Plan (the “Con Plan”) every five years pursuant to Federal Regulations at 24CR Part 91. The Con Plan is implemented through the preparation of an Annual Action Plan each of the five years which describes the use of the annual formula grants received from HUD for activities delineated in the Con Plan. The process to develop the Con Plan is a collaborative one. The Con Plan provides a comprehensive housing and community development vision that includes affordable housing, non-housing community development (public facilities, public improvements, infrastructure, public services, and economic development), fair housing, protection of the environment, and an avenue for extensive citizen engagement and feedback.

According to HUD guidance, the overall goal of the community planning and development programs is to develop viable urban communities by providing decent housing, a suitable living environment, and expanding economic opportunities principally for low- and moderate-income persons. This is achieved by strengthening partnerships among all levels of government and the private sector, including for-profit and non-profit entities. The City’s FY 2025-2029 Consolidated Plan is used to assess its housing and community development needs; analyze its housing market; establish housing and community development priorities, goals, and strategies to address the identified needs; identify the resources to address them; and to stipulate how funds will be allocated to housing and community development activities. Available resources from the Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with HIV/AIDS (HOPWA) programs, as well as Program Income received and carry-over funds, will be leveraged with private sector and other public sector funds to implement these strategies. The Con Plan is also designed to improve program accountability and support results-oriented management. The Con Plan covers the period from July 1, 2025, through June 30, 2030, and upon completion, will be submitted to HUD for review and approval.

The City’s FY 2025-2026 (first year) Annual Action Plan includes the strategies, goals, and objectives established in the FY 2025-2029 Consolidated Plan and is the annual funding application for the CDBG, HOME, ESG, and HOPWA programs. In addition to the Con Plan, HUD requires that cities and states receiving federal block grants take actions to “affirmatively further fair housing choice.” Based on the funding awarded for FY 2025-2026, the allocation of available funding for the five-year Con Plan is estimated as follows:

- Community Development Block Grant (CDBG) - \$161,148,410
- HOME Investment Partnership (HOME) - \$29,924,510.45
- Emergency Solutions Grant (ESG) - \$14,395,655
- Housing Opportunities for Persons with HIV/AIDS (HOPWA) - \$17,713,590

The City also estimates program income of \$4.2 million from the HOME program and \$1.4M in CDBG funding (from 0% home repair program) .

As part of the 2025-2029 Consolidated Plan, the City of Detroit is applying for a second extension to its original Neighborhood Revitalization Strategy Area (“NRSA”) designation from HUD in the 2015-2019 Consolidated Plan. The City intends to reapply to HUD for an extension of the NRSA designation and submit it along with the FY 2025-2029 Con Plan. Per HUD Notice CPD-16-16, page 4, the City may “*submit a request to renew an existing NRSA, with updated required contents and a written statement that the strategy can still be effective if approved; or submit a request for approval of an amended strategy with a new term.*” Based on the most recent American Community Survey data, there have been some adjustments to the NRSA boundaries. As a result, the City will submit an amended strategy including eligible activities that are new and others that are incomplete from the previous NRSA designation with a new term.

The City of Detroit serves its homeless population through its participation in the Detroit Continuum of Care (CoC). Since 1996, the Homeless Action Network of Detroit (HAND) is the lead agency for services, programs, and data for the Detroit CoC and was consulted as a part of this process the Detroit Housing Commission (DHC) is Detroit's Public Housing Agency (PHA) administering public housing and Section 8 housing choice vouchers in the City and was consulted as part of this process.

All programs described herein are free from racial, ethnic, gender identity, or ideological preferences, and are administered in compliance with federal laws that prohibit discrimination and promote equal opportunity based on objective criteria. Detroit remains committed to housing for all residents and does not include any group preference, selection criteria, or set asides based on race, ethnicity, gender identity, or sexual orientation. The city continues to participate in the Detroit Continuum of Care (CoC), ensuring safe, affordable, mobility-accessible, adaptable, and barrier-free (stairs and high thresholds) housing for all residents.

In preparing and implementing this plan, the City follows all federal laws and regulations, including those related to nondiscrimination and civil rights. As required under Executive Order 14168, the City will not use any grant funds to promote gender ideology. In line with Executive Order 14182, no grant funds will be used to support or promote elective abortions. The City's programs and funding decisions are not subject to any Executive Orders that have been revoked, including those listed under Executive Order 14154.

The City will also follow immigration-related requirements, including verifying eligibility for public benefits as outlined in federal law and Executive Order 14218. Programs will not be used to support or encourage unlawful immigration. The City will use approved federal systems, like SAVE, to confirm eligibility when required. Faith-based organizations are welcome to apply for and receive funding, and they will be considered on the same basis as all other applicants, with no bias based on religious beliefs or affiliations. These requirements help ensure that all programs are operated with integrity, in full compliance with federal guidelines, and in the best interest of the community.

The City of Detroit agrees that its compliance in all respects with all applicable Federal anti-discrimination laws is material to the U.S. Government's payment decisions for purposes of section 3729(b)(4) of title 31, United States Code.

The City of Detroit will not operate any programs that violate any applicable Federal anti-discrimination laws, including Title VI of the Civil Rights Act of 1964.

The City of Detroit shall not use grant funds to promote “gender ideology,” as defined in Executive Order (E.O.) 14168, Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview:

The City of Detroit has developed its strategic plan based on an analysis of the demographic, housing, and economic development data presented in this plan and the community participation and stakeholder consultation process. Below are the objectives and outcomes that the City has identified under the FY 2025-2029 Consolidated Plan. Actual activities and outcomes may vary each Annual Action Plan year and will be based on those established during the Consolidated Plan process and the amount of the City’s annual allocation. Federal law requires that housing and community development grant funds primarily benefit low- and moderate-income persons (LMI), whose household incomes are at or below 80% of the AMI as determined and adjusted annually.

There are three main objectives of the Consolidated Plan and use of federal funds:

1. **Decent and Affordable Housing** - Activities designed to cover the wide range of housing eligible under CDBG and HOME programs.
2. **Suitable Living Environment** - Activities designed to benefit communities, families, or individuals by addressing issues in their environment.
3. **Expanded Economic Opportunities** - This objective applies to economic development, commercial revitalization, and/or job creation/retention activities.

For each objective, the following outcomes and examples of outcome indicators are provided:

- **Availability and Accessibility** - Performance Indicator: Number of Projects that Ensure Access to a Suitable Living Environment/ Number of Persons Provided with New Access to Improvements
- **Affordability** for the Purpose of Providing Decent Housing - Performance Indicator: Households Assisted, Houses Repaired.
- **Sustainability** for the Purpose of Creating Economic Opportunities -Performance Indicator: Number of Businesses Assisted., Number of Jobs created or retained

Through the public input and data analysis, the City has identified six priority needs and related goals to address those needs. The priority needs include:

1. Housing Rehabilitation and Ownership

Detroit prioritizes preserving and expanding affordable homeownership. Programs include home repair support, down payment assistance, and new construction by local developers. High need is driven by aging housing stock, high cost burden, and community input.

Proposed outcomes include senior home repair, senior home repair, 0% interest home repair loans, CDBG lead paint match, and down payment assistance

2. Affordable and Supportive Rental Housing

The city seeks to expand and maintain affordable rental units, especially for vulnerable populations. Rising rents and cost burdens necessitate new construction and preservation of existing housing. Permanent and transitional housing options are key to addressing homelessness.

Proposed outcomes include pre-development assistance for multifamily housing, rehabilitation of rental properties, and affordable Housing Opportunities For People With Aids (HOPWA)

3. Economic Development and Employment

Investments in small businesses, job creation, and employment training are critical. Residents emphasized support for local enterprises, and skill-building programs for low-to-moderate-income residents.

Proposed outcomes include small business assistance and job training.

4. Public Services and Facilities

CDBG funds will support essential services like mental health care, youth programs, and senior assistance. Improvements to public and community facilities are also prioritized, particularly in underserved areas. Survey results highlight demand for wraparound support services.

Proposed outcomes include Youth Education and Summer Jobs Programs, Senior Programs, Recreation Programs, Community Safety and Health Programs

5. Infrastructure and Blight Removal

Residents identified infrastructure repair—streets, sidewalks, water/sewer—as a major need. Strategic demolition of blighted structures complements broader redevelopment goals. These investments support safe, vibrant, and resilient neighborhoods.

Proposed outcomes include Public Facility Rehabilitation, Park Improvements, Blight Removal and Demolition.

6. Homelessness Prevention and Housing Stability

A coordinated response to homelessness includes emergency shelter, outreach, rapid re-housing, and permanent housing. Programs target individuals and families at risk or currently unhoused. Emphasis is on wraparound support and reducing time spent homeless.

Proposed outcomes include Homelessness Outreach, Emergency Shelter, Rapid Rehousing, and Prevention

3. Evaluation of past performance

As a recipient of CDBG, HOME, ESG, and HOPWA program funds, the City is required to submit a Consolidated Annual Performance and Evaluation Performance Report (CAPER) at the end of each program

year. The CAPER summarizes the program year accomplishments and the progress towards the Consolidated Plan goals. As noted in the 2023-2024 CAPER, based on the priorities established, the City continues to place emphasis on decent, safe, and affordable housing; elimination of homelessness; public services; fair housing activities; improvement of neighborhood conditions; and economic development.

The City continued to work with HOME developers to preserve City-assisted affordable housing projects and allow existing residents to remain in the City while attracting new residents by negotiating partial loan payoffs and modifications. The City continued to implement its major housing rehabilitation programs throughout the city using a loan program and grants to stabilize neighborhoods. Since federal funding cannot sustain the great need for city residents, the city has added its general funding to support the single-family rehabilitation housing program primarily for seniors and the disabled. Throughout the year, several new initiatives such as the auction of publicly owned houses, sale of vacant lots, aggressive code enforcement and an expansive demolition effort helped stabilize neighborhoods.

For FY 2020-2024 as reported in the CAPER, the City of Detroit's performance was evaluated by staff who noted the following key accomplishments, challenges, and quantitative outcomes related to grant-funded activities:

Main Accomplishments

- **Affordable Housing:**
 - 618 affordable rental units were completed or under construction.
 - 25 homeownership units were supported through down payment assistance and new construction.
- **HOME-ARP:**
 - Detroit became one of the first jurisdictions to obligate 100% of its \$26.6M HOME-ARP allocation, focused on supportive housing for vulnerable populations.
- **Public Facility Improvements:**
 - 15 parks and recreation centers were improved with CDBG funds.
 - 7 streetscape or infrastructure projects advanced in low- to moderate-income neighborhoods.
- **Economic Development:**
 - Over 450 microenterprises and small businesses received grants, loans, or technical assistance.
- **Supportive Services:**
 - Over 2,200 individuals benefited from services including job readiness, housing counseling, and youth programming.
- **Lead Hazard Reduction:**
 - Lead abatement completed in over 90 housing units, with additional units in progress.

Main Challenges

- Rising construction costs created funding gaps, particularly in multifamily projects.
- Delays due to procurement, permitting, and contractor availability.
- Data tracking across subrecipients remains a challenge for performance reporting.
- Staffing shortages limited the pace of project execution and compliance monitoring.

- Difficulty in securing non-federal match for large-scale development projects.

Total Expended by Grant Program

Program	Amount Expended	Key Outputs
CDBG	\$31.2 million	Public facility upgrades, business support, housing rehab
HOME	\$9.8 million	Rental/new construction, down payment assistance
HOME-ARP	\$26.6 million	Supportive housing and services for homeless populations
ESG	\$3.6 million	Shelter operations, rapid rehousing, homelessness prevention
HOPWA	\$2.1 million	Housing and services for persons with HIV/AIDS
CDBG-CV & ESG-CV	\$4.5 million	COVID-related shelter, food assistance, and rental aid

Individuals/Households/Units Benefitted

- Over 2,200 individuals received supportive services.
- 618 affordable rental units built or rehabbed.
- 25 homeownership units supported.
- Over 450 small businesses assisted.
- Over 90 housing units received lead-hazard reduction.
- 15 public facilities and 7 infrastructure projects completed or underway.

4. Summary of citizen participation process and consultation process

To develop the FY 2025–2029 Consolidated Plan and Neighborhood Revitalization Strategy Area (NRSA) application, the City of Detroit’s Housing and Revitalization Department (HRD), supported by planning consultants, led a comprehensive community engagement process. This effort combined virtual and in-person events, surveys, and creative interactive tools to ensure broad and inclusive participation from residents, nonprofit organizations, and public agencies.

Outreach activities included two virtual Resident Priority Input Sessions in April 2025 and two in-person Neighborhood Feedback Sessions in June 2025, specifically held in targeted NRSA areas. Additionally, two public hearings were conducted, on June 18 and July 17, 2025, to present draft plans and gather final comments. Throughout March 2025, HRD staff participated in eight Department of Neighborhoods “DONcast” meetings across all City Council districts to further engage residents. Two Neighborhood Opportunity Fund (NOF) provider meetings were also held in August and September 2024 with nonprofit service providers.

To complement these events, two surveys—one for residents and one for service agencies—were launched in March 2025 and remained open through mid-April. A total of 424 residents and 30 agencies, representing over 150,000 individuals annually, provided feedback.

A centralized webpage (www.DetroitMI.gov/HRD) was maintained to provide updates, share event details, and offer access to surveys and plan documents. Public notices were published in the *Detroit Free Press* in May and June 2025. Draft plans were made available both online and in physical community locations,

with a 30-day public comment period for the Consolidated Plan and a 15-day period for the NRSA application beginning June 25, 2025.

In total, more than 1,155 individuals and organizations participated in shaping the City's housing and community development goals for the next five years. Their input directly informed the funding priorities and strategic direction outlined in the final plan

5. Summary of public comments

Detroit residents and other stakeholders expressed clear priorities during multiple public forums as described above and in PR-15 section between December 2024 and June 2025. Housing emerged as a dominant concern, particularly around repair grants, legacy homeowners, and access to affordable programs. Residents frequently cited difficulties with eligibility restrictions, insurance barriers, and the complexity of program navigation. Participants asked for more outreach, simplified processes, and greater transparency around funding and availability.

In neighborhood revitalization, participants emphasized support for parks, green infrastructure, and investments in small businesses run by local residents. Many stressed the need for city agencies to build stronger ties with Community Development Organizations (CDOs), and to provide more consistent communication and outreach.

Public and social services were also highlighted, especially mental health, elder care, crisis response, and transportation access. Residents expressed frustration with food deserts, abandoned housing, and lack of environmental justice in certain neighborhoods. Senior and community programming was seen as vital but currently under-supported.

In the area of economic development, calls were made for job creation, workforce training, and support for microbusinesses. Attendees emphasized the need to direct investment to communities most in need and recommended more flexible financial options like micro-grants and installment-based disbursements for nonprofits. Some residents expressed a need for capacity building and assistance to community based non-profit housing developers.

Finally, a strong demand was voiced for improved communications. Many residents were unclear on what the Consolidated Plan is, how funds are allocated, and whether their feedback results in meaningful change. Calls for plain-language materials, public access to presentations, and visible neighborhood-level impacts were consistent across meetings.

Programs and their impact: Several stakeholders sought information on the HRD Home Repair Program and the application process. Questions included funding availability for senior populations and if the consolidated plan will include funding for this type of home repair.

Loan Programs: Comments and questions were received about the 0% Interest Loan Program, how to qualify, the application process, and how many applications are accepted.

Funding: Related to CDBG/NOF Funds, questions were received and answered about the application processes for funding, deadlines, and what funding is included.

City officials answered questions and referred citizens to the relevant departments where applicable.

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

All comments or views were accepted.

7. Summary

Detroit's path to recovery begins at the neighborhood level. Residents have expressed a wide range of needs, especially among vulnerable populations, as reflected in public comments and demographic data. The City aims to use Consolidated Plan funding to strengthen communities and create pathways out of poverty.

As detailed in Section 5, residents voiced strong interest in Community Development Block Grant (CDBG) program guidelines, greater coordination across federally funded programs, and improvements to public health conditions. Many also questions and make suggestions on how federal dollars could be allocated and how they could impact their neighborhoods.

In 2015, HUD approved five Neighborhood Revitalization Strategy Areas (NRSAs) in Detroit to focus CDBG and other federal resources where they could be most effective, leveraging existing redevelopment efforts. Additionally, the City designated three adjacent slum and blight areas—outside the NRSAs—to provide home repair assistance to households earning above 80% of Area Median Income (AMI).

NRSA designation offers key benefits, including:

- Job creation and retention in low- to moderate-income areas
- Flexibility to assist up to 49% of clients above 80% AMI in housing projects
- Exemption from the aggregate public benefit standard
- Exemption from the public service cap

While the NRSA strategy has yielded positive outcomes, significant need remains. In light of increased private investment and public-private collaboration in low- and moderate-income neighborhoods, the City is seeking a second renewal of its NRSA designation.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

1. Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

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

Agency Role	Name	Department/Agency
CDBG Administrator	DETROIT	Housing and Revitalization Department
HOPWA Administrator	DETROIT	City of Detroit Health Department
HOME Administrator	DETROIT	Housing and Revitalization Department
ESG Administrator	DETROIT	Housing and Revitalization Department

Table 1 – Responsible Agencies

Narrative

The City of Detroit Housing and Revitalization Department (HRD) leads the preparation and implementation of the Consolidated Plan. The Department is also responsible for administering the expenditures of federal funds received from the U. S. Department of Housing and Urban Development (HUD) and for the implementation of the priorities and goals identified in this plan. The city currently receives entitlement Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with HIV/AIDS (HOPWA) from HUD. The Department administers the CDBG, HOME, and ESG grant programs, and the Detroit Health Department administers the HOPWA program.

To achieve the plan’s goals, HRD will collaborate with nonprofits, businesses, other City departments, and government agencies at all levels to improve conditions for Detroit residents and neighborhoods. The HUD federal funds will be leveraged with other public and private sector funding. State of Michigan resources included low-income housing tax credits, and lead hazard grants. The Detroit Health Department partners with a network of hospitals, clinics, and experienced non-profit service providers to care for and treat persons living with HIV/AIDS.

Consolidated Plan Public Contact Information

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PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

1. Introduction

As part of the 2025-2029 Consolidated Plan process, HUD requires the City to consult with housing providers, non-profit organizations, social service providers, and other key stakeholders that serve the communities impacted by the funding received from HUD. These stakeholders included organizations working with LMI households, other City departments, regional and local government jurisdictions, the Detroit Housing Commission, the Detroit Continuum of Care, various non-profit agencies, and fair housing and community health organizations listed below in Table 2.

The input from the consultations was used to assist HRD in determining housing and community development needs and establishing priorities, goals, and strategies within the context of limited resources to meet all the needs and service delivery challenges. The consultations were conducted using housing and community development surveys, interviews, email inquiries, and public meetings/hearings. The City's outreach effort was designed to fully capture the scope of needs within the City and provide a more effective and meaningful community participation process that educates the community about the selected HUD grant activities and facilitates better service delivery and community benefits.

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

The City of Detroit is committed to partnering with public and private housing providers and area agencies to ensure their efforts align with the City's affordable housing goals. To accomplish this, the City of Detroit Housing & Revitalization Department (HRD) works as a strategic partner to these agencies on ways to improve coordination among agencies serving the City's LMI populations. In recent years, over seventy percent of the City's HUD funds have been targeted in geographic locations that align with investments by other stakeholders, thereby making the best use of existing community assets and advancing the restoration of distressed communities. The City's use of HUD-approved Neighborhood Revitalization Strategy Areas (NRSAs) helps to target the HUD resources in a more comprehensive manner and leverages other non-HUD resources for greater impact.

HRD is working with the Detroit Housing Commission (DHC) on the Path to High-Performance goal. The goal of acquiring and disposing of vacant units from the DHC's portfolio will be achieved in collaboration with the DLBA and DBA. These vacant units represent barriers to DHC's ability to revitalize distressed areas and effectively serve low income Detroiters.

HRD regularly consults with the Detroit Land Bank Authority (DLBA) on making vacant homes and properties available to LMI residents, and with the Detroit Building Authority (DBA) on efforts to improve housing options for low income residents of the City on demolition and resale programs.

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

Since 1996, the Homeless Action Network of Detroit (HAND) has served as lead agency for the Detroit Continuum of Care (CoC). The City of Detroit works together with HAND to provide services to homeless individuals and families. HRD staff has worked extensively with HAND to develop goals and strategies for Detroit's homeless populations, and HAND staff has been involved in reviewing both ESG and CDBG proposals over the last many years. This collaboration will allow for more efficiency and better outcomes as homeless strategies and goals are implemented.

There is currently an elected and appointed Continuum of Care board tasked with making decisions on behalf of the larger community to meet the needs of those experiencing homelessness. The City of Detroit maintains three seats on the CoC Board, as well as on the various subcommittees formed to focus on specific issues such as Veterans homelessness, the chronic homeless, youth homelessness, etc.

Through participation on the CoC board, the City of Detroit is able to meet regularly with HAND to better coordinate services for homeless persons (particularly the targeted populations such as chronic, youth, veterans, etc.) and persons at risk of homelessness. Through these coordinated efforts, the City can better align the use of McKinney-Vento funding to the homeless priorities outlined in the homelessness strategy of this Consolidated Plan.

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

HRD staff continue to consult with HAND in determining how best to allocate ESG funding to address the highest priority needs. The City, together with HAND and various other funders of homeless services, collaborated in the development of written performance standards and evaluation techniques for the use of ESG and other funds within the continuum. This collaboration led to the creation of a Performance and Evaluation Committee which oversees implementation of the written standards and the development of a collaborative monitoring process for all recipients of homeless funding. This will allow a "full picture" assessment of an organizations performance across programs to ensure they are achieving the desired impact to end homelessness for Detroit residents.

In addition, HAND participates in the development of HRD's CDBG and ESG Request for Proposals and participates in the application review process to ensure that applicants align their efforts with the CoC's strategies, that the CoC strives to fund quality providers that serve HUD priority populations, and that funding applications agree regarding local community needs.

2. Describe Agencies, groups, organizations, and others who participated in the process and describe the jurisdiction’s consultations with housing, social service agencies and other entities.

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Detroit Housing Commission (DHC)
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Homeless Strategy Housing Need Assessment Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The consultation was done through emails, review of the Detroit Housing Commission (DHC) website and documents. The DHC and HRD collaborate on efforts to coordinate projects within the City of Detroit w/the goal of increasing housing opportunities.
2	Agency/Group/Organization	Homeless Action Network of Detroit
	Agency/Group/Organization Type	Continuum of Care
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronic Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Housing Needs Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	HAND was consulted via email and website review and is closely involved in CDBG and ESG homeless planning and implementation activities throughout the plan period. Since 1996, HAND has served as the lead entity for the Continuum of Care for the City of Detroit, although its jurisdictional responsibilities stretch to cities such as Hamtramck and Highland Park as well.
3	Agency/Group/Organization	Fair Housing Center of Metropolitan Detroit
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Housing Needs Assessment Market Analysis

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation was done through a review of resource materials on their website. The Fair Housing Center (FHC) of Metropolitan Detroit conducts training, fair housing tests, and represents fair housing cases in Metro Detroit. There are several landlord-tenant resources. The City will partner with the organization on training and fair housing conferences.
4	Agency/Group/Organization	Department of Neighborhoods
	Agency/Group/Organization Type	Other government - Local Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Community Development and Blight Control
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Meetings were held with the Department of Neighborhoods (DON) staff to coordinate information and plan strategies on the distribution of e-blast notices and flyers to promote the Consolidated Plan meetings and assist HRD regarding blight control and neighborhood conditions. Eight "plug-in presentations on the Con Plan and the NRSAs were made at eight monthly DON resident meetings in all areas of the city
5	Agency/Group/Organization	Detroit Police Department
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Safety and Domestic Violence
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted with the Domestic Violence Unit via their website for information to determine how the City can assist with funding strategies for domestic violence survivors.
6	Agency/Group/Organization	City of Detroit Health Department
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS Health Agency Child Welfare Agency Other government - Local Grantee Department
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs HOPWA Strategy Lead-based Paint Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	HRD consulted with the Detroit Health Department via email, and their website. Coordination efforts help shape effective strategies across priority areas. For substance abuse, collaboration supports the development of targeted program approaches. The City also consulted with the HOPWA coordinator to inform HIV/AIDS strategies in the Consolidated Plan. The Detroit Health Department leads the monthly Lead Safe Detroit working group, which guides lead poisoning prevention efforts and refers eligible households to HRD’s lead programs. Additional agency input, gathered through an online survey, highlighted needs such as increased funding, higher wages, and resolution of policy and governance challenges.
7	Agency/Group/Organization	Housing and Revitalization Department (HRD)
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The HRD staff worked with other departments that intersect with the use of federal grants and who have data to assess housing and community development needs.
8	Agency/Group/Organization	Detroit Land Bank Authority
	Agency/Group/Organization Type	Other government – Local
	What section of the Plan was addressed by Consultation?	Blight Control and Demolition
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Information was received from DLBA staff and their website regarding completed work and upcoming initiatives. HRD will use the information to better coordinate and report on demolition and blight control efforts.
9	Agency/Group/Organization	Local Initiatives Support Corporation
	Agency/Group/Organization Type	Services – Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Meetings, website review and email were used to consult with the Detroit LISC office which is a CDBG subrecipient for administering the City's 0% interest loan program. The program is operated in the city's Neighborhood Revitalization Strategy Areas (NRSA) and the designated Slum and Blighted areas. Detroit LISC also administers the Detroit Housing for the Future Fund with partnership with the City. LISC assists with leveraging private sector loan capital to
10	Agency/Group/Organization	Detroit Employment Solution Corporation
	Agency/Group/Organization Type	Other government – Local
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Detroit Employment Solutions Corporation (DESC) along with City Connect Detroit are consulted to operate and provide the City's Summer Youth Employment and Job Training programs. These efforts support LMI youth living in areas designated in one of the five Neighborhood Revitalization Strategy Areas. The anticipated outcome was the program renewal and alignment of new NRSA goals.
11	Agency/Group/Organization	Southwest Solutions
	Agency/Group/Organization Type	Services - Housing Services-Employment Mental Health
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Non-housing community development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted with a review of plans and website. The need for greater coordination of services and housing development was identified.
12	Agency/Group/Organization	Civil Rights, Inclusion & Opportunity Department (CRIO)
	Agency/Group/Organization Type	Services – Housing Complaints Services – Fair Housing

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation was done by reviewing their website. Agency assures all City of Detroit residents, visitors, and employees enjoy a safe environment, free of discriminatory barriers, training, and job opportunities on construction projects. The review revealed a greater need to increase awareness of the agency's purpose and service.
13	Agency/Group/Organization	Matrix Human Services
	Agency/Group/Organization Type	Services – Elderly Persons Services – Education Services – Children Services - Employment Services-Persons with HIV/AIDS Other – Head start community center
	What section of the Plan was addressed by Consultation?	Economic Development Non-Homeless Special Need
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency input on target populations, services, and needs was received via an online survey and review of their website. The consultation identified the need increased resources and awareness of services.
14	Agency/Group/Organization	Detroit Homeland Security and Emergency Management (DHSEM)
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	<input checked="" type="checkbox"/> Agency - Managing Flood Prone Areas <input type="checkbox"/> Agency - Management of Public Land or Water Resources <input checked="" type="checkbox"/> Agency - Emergency Management

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation was done through a review of website and materials. DHSEM coordinates with local, regional, state, federal, and private-sector agencies to protect the community from natural and human-made emergencies and disasters. The impact of climate change on Detroit's aging stormwater systems could lead to flooded basements and streets and sewage overflows into the Detroit River. It is important in responding to climate change and disasters that low-to-moderate income neighborhoods and housing that is most vulnerable are included and given priority.
15	Agency/Group/Organization	Planning and Development (P&DD)
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	<input checked="" type="checkbox"/> Agency - Managing Flood Prone Areas <input checked="" type="checkbox"/> Agency - Management of Public Land or Water Resources <input type="checkbox"/>
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The consultation was done through email and teleconference. P&DD coordinates with HRD and Detroit Land Bank Authority to manage the city's publicly owned land. The City sells surplus property to residents, community organizations, developers, and others for a variety of uses that provide public benefit and return the properties to productive use. P&DD manages neighborhood framework plans including long-term strategies for housing & retail development and parks & green stormwater infrastructure and the management of wetlands identified during the framework comprehensive studies.
16	Agency/Group/Organization	Detroit Department of Digital Inclusion
	Agency/Group/Organization Type	Other government - Local Grantee Department

	What section of the Plan was addressed by Consultation?	Housing Market Analysis Services – Narrowing the Digital Divide
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	<p>Consultation was done through a review of the web page and materials. The City of Detroit’s Office of Digital Equity & Inclusion is working to close the digital divide, a need amplified by the COVID-19 pandemic. Efforts focus on expanding affordable internet, distributing refurbished devices, and offering digital skills training, especially for low-income residents, seniors, veterans, ESL communities, students, and returning citizens.</p> <p>Key initiatives include a \$10 million fiber-optic pilot in Hope Village, device partnerships, community tech hubs, an interactive digital resource map, and workforce training through programs like Detroit at Work and Per Scholas.</p> <p>These efforts have led to Detroit achieving the nation’s highest Affordable Connectivity Program enrollment among large cities and earning national recognition for its leadership.</p> <p>Challenges remain, including uncertain long-term funding, limited public awareness, and the need for stronger data collection to guide and measure impact. Continued outreach, stable resources, and data-driven improvements will be critical to sustaining Detroit’s progress in digital inclusion.</p>

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

N/A

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Homeless Action Network of Detroit	Collaboration between HRD and HAND will continue to impact the Action Plan homeless goals.
City of Detroit Master Plan and Policies	City of Detroit	The Master Plan outlines local policy supporting the plan project and activity development.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Affirmatively Furthering Fair Housing (AFFH)	City of Detroit	The AFFH is coordinated with the Consolidated Plan housing strategies and goals (including affordable housing).
Detroit Multi-family Affordable Housing Strategy 2018	City of Detroit	The affordable housing strategies align with the affordable housing goals of the Con Plan and the steps to reduce barriers to affordable housing
Strategic Neighborhood Fund 2.0	Invest Detroit	The affordable housing and community revitalization activities proposed for the fund align with the Con Plan goals for addressing housing and community development needs
Capital Agenda	City of Detroit	The Capital Agenda identifies capital projects within the City of Detroit by city department.
Blight Task Force Report	Blight Task Force	The City of Detroit Blight Task Force report is in line with the Mayor's 10 Point Plan that guides strategies within the Consolidated Plan
Every Neighborhood Has A Future Plans	City of Detroit	The Mayor's Neighborhood Plan guides investments within Detroit Neighborhoods including Consolidated Plan funding.
Detroit Future City Strategic Framework	Detroit Future City	Detroit Future City analyses provide vision and actions that coordinate with Consolidated Plan strategies and goals.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I)).

The City of Detroit coordinates housing and community development funding and programs with the Michigan State Housing Development Organization (MSHDA) as it relates to homeless prevention and Continuum of Care (CoC) activities. The City is entering its third year of funding for Medicaid and Children’s Health Insurance Program (CHIP) from the Michigan Department of Health and Human Services (MDHHS). These funds are used to abate lead hazards in Detroit homes. The City also collaborates with MSHDA by providing HOME subsidies to projects receiving low income housing tax credits from MSHDA. This consists of HOME assisted projects receiving 9% competitive tax credits and an allocation of 4% credits provided by MSHDA through the City’s Affordable Housing Leverage Fund (AHLF) which is administered by the Detroit office of Local Initiatives Support Corporation (LISC). The city works with Wayne County and other adjacent governmental entities to coordinate housing and community development initiatives.

Narrative (optional):

The Health Services Division is responsible for mobilizing Detroit Health Department resources and forming strategic partnerships to improve the health of children and families who live, work, and play in Detroit. The Division includes the following programs/services:

1. Children's Special Healthcare Services
2. Vision and Hearing Screening
3. Lead Poisoning Prevention and Intervention
 - Childhood Lead Poisoning Prevention Program (CLPPP)
 - Early Child Care Integrated Service Delivery Model
 - Universal Lead Testing /Clinician Engagement and School Based Testing

The City of Detroit's Health Department (DHD) developed a coalition of city departments, state departments and community partners to coordinate childhood lead prevention in the City. The coalition, also known as Lead Safe Detroit, provides the following services: Provides capillary testing to children younger than 6 years of age and provides coordinated, comprehensive nursing case management services in the child's home; Maintains a data and surveillance system to track trends and better coordinate services throughout the city; Distributes lead prevention education material and provides presentations to parents, health care professionals, and rental property owners; Provides referrals to other agencies for lead hazard remediation; Ensures schools, daycares and homes have water testing; Strengthens Environmental Controls on Demolitions. In addition, Lead Safe Detroit meets on a monthly basis with multiple partners across the city and the Southeast Michigan region to work on a variety of lead prevention issues including, but not limited to, enforcement, service delivery, lead education, and lead-safe housing.

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal setting

The City of Detroit’s Housing and Revitalization Department (HRD) used a comprehensive and multi-pronged community participation and consultation process to gather comments and ideas from residents, community organizations, and public agencies for the FY 2025–2029 Consolidated Plan. The City’s efforts were supported by planning consultants and featured both in-person and virtual meetings, online surveys, meetings, and interactive workshops targeting residents, non-profits, agencies, and other stakeholders. Communication channels included emails, newspaper ads, flyers, social media, and websites.

To inform the development of the 2025–2029 Consolidated Plan, the City of Detroit launched a multi-pronged community engagement strategy designed to reach both residents and institutional stakeholders. The approach included online surveys for residents and agencies, virtual focus groups with HUD-funded organizations, and a series of education 'plug-in' sessions at existing City-hosted virtual events. Additionally, two virtual Resident Priority Input sessions were held to introduce plan concepts and gather insights through interactive digital exercises. Two in-person Neighborhood Feedback sessions were held in the targeted NRSAs, using creative hands-on tools to collect community input on housing and development priorities. Virtual and in-person public hearings were held. A dedicated webpage on the City’s website provided updates on the process. These engagement efforts, coordinated by consultants in collaboration with City staff, focused on accessibility, creativity, and timely outreach to ensure meaningful public participation in shaping Detroit’s housing and development strategy over the next five years.

The engagement process emphasized accessibility and creativity, incorporating online tools like Zoom, Google Slides, and QR-code flyers to expand reach. Workshops used interactive formats to encourage resident feedback on housing, public services, economic opportunities, and neighborhood development. City staff collaborated with consultants to promote events, develop materials, and analyze feedback. Feedback gathered during this process directly informed the plan’s goals and priorities, including expanded investment in housing and community development citywide and in the five NRSAs.

Key citizen participation and agency consultation activities included:

- Two Neighborhood Opportunity Fund (NOF) meetings with non-profit public service providers on Aug 27, 2024 (74 attendees) and Sept 19, 2024) - 45 attendees.
- Two Department of Neighborhood meetings with residents in District 2 (Dec 10, 2024) – 75 attendees) and District 5 (Dec 18, 2024) - 28 attendees.
- Eight (8) monthly Department of Neighborhoods (DON)cast district meetings across all seven council districts in March 2025 in a “plug-in” format with over 400 participants.
- Two online surveys (one for residents, one for agencies) were released on March 12 and active through April 14, 2025. The survey sought to identify housing and community development needs city wide and in the five proposed NRSAs.
 - a. 424 residents responded to a 25-question survey
 - b. 30 agencies serving 150,725 persons annually responded to an 18-question survey

- Two virtual Resident Priority sessions were held to introduce the Consolidated Plan and gather public priorities on April 22 and 24, 2025 with 55 and 30 participants, respectively.
- Two in-person Neighborhood Feedback sessions were held on June 3 and 5 to review and refine draft recommendations with 37 and 44 participants, respectively.
- Newspaper advertisements were published on May 28, 2025 and June 25, 2025 (30-day comment period in the Detroit Free Press. Affidavits of publication are attached as appendices.
- A centralized Consolidated Plan/NRSA webpage was developed to share updates, event details, and provide public access to survey and plan documents. The URL was www.DetroitMI.gov/HRD.
- The draft FY 2025-2029 Consolidated Plan was published for a 30-day period from June 25 to July 25, 2025, with printed copies at community district locations and a pdf copy on the City's website.
- The draft FY 2025-2029 NRSA draft application was published for a 15-day period from June 25 to July 25, 2025, with printed copies at community locations and a pdf copy on the City's website.
- A virtual public hearing on the Consolidated Plan and the NRSA to get further feedback was held on June 18 with 32 participants.
- At a public hearing #1, the plans were introduced to the City Council on July 11, and the Council Committee was held July 15, 2025, 137 participants. A Public Hearing #2 and the City Council review and approval of the plans was held on July 22, 2025, 217 participants

Over 1,409 [to be updated when process completed] individuals and organizations provided input on the FY 2025-2029 Consolidated Plan and the NRSA application.

Community surveys

Residents and agencies responded to the online housing and community development surveys which were run from March 14 through April 11, 2025, through web links, QR codes, flyers & social media. The profile of the respondents was: race and ethnicity - 55% African American, 24% White, and 10% Hispanic, majority were homeowners and average household size were three (3) persons, Most respondents came from 48224, 48201, and 48219 zip codes.

Housing and Community Development Needs and Priorities

Housing and community development needs and priorities were shaped by community feedback from surveys and meetings, as well as HUD and Census data analysis. When asked to classify activities by urgency, respondents identified "High Need" activities for federal funding and "Low Need" activities for which other funding sources may suffice. The list of top high-priority activities is noted below.

- **Housing:** Owner-occupied home repair was ranked the highest housing need, followed by affordable single-family and multi-family rentals. This aligns with data showing that 50% of Detroit households are cost-burdened, paying more than 30% of income on housing, and 58,000 households are severely cost-burdened, paying more than 50% of income on housing. Other data include over 90% of Detroit homes were built before 1980, rents rose 15% citywide from 2009–2020, and 39% of homes have at least one deficiency or condition needing repair. This limits household affordability for rental units and homeownership.
- **Public Infrastructure & Neighborhoods:** Water and sewer upgrades were the top priority, followed by street/sidewalk improvements and demolition of substandard structures. While

progress has been made, critical infrastructure needs remain. Public facility improvements also included other facilities operated by non-profits and serving persons with special needs.

- **Community & Public Facilities:** Youth centers ranked highest, followed by childcare and community centers. These facilities are seen as essential sources of community stability.
- **Public Services:** Mental health services led in priority, followed by transportation and fair housing. Over 80% and 86% of the respondents want more programs for seniors and youth, respectively. This is confirmed by data where 97,000 seniors in Detroit and 43% live with a disability. The high ranking of nearly all public services reflects the broad community need for addressing both basic needs and long-term stability.
- **Homeless Prevention:** Top homelessness needs included emergency support services, homelessness prevention, emergency shelters, and permanent housing. With rising housing costs and low incomes, many residents are at risk of or currently experiencing homelessness. Feedback from homeless service providers to better understand current challenges and identify practical solutions. Providers reported ongoing gaps in mental health and substance abuse treatment, transportation, rental assistance, and housing—especially for youth and domestic violence survivors. They also stressed the need for wraparound services including case management, referrals, food, hygiene supplies, and crisis support. Addressing homelessness in Detroit is key to providing housing for all residents.
- **Economic Development:** Employment training was the highest-ranked need, followed by job creation and start-up business support. With median annual household income of \$31,000, 20% of Detroiters ages 18–24 have not completed high school, and longstanding economic shifts, workforce development remains a top priority.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Neighborhood Opportunity (NOF) Public Meeting – 8/27/24	Non-profits	Questions and comments were focused on the process for awarding CDBG-funded public services /92 participants	See Exhibit for public comments	All comments accepted	
2	Neighborhood Opportunity (NOF) Public Meeting – 9/27/24	Non-profits	Questions and comments were focused on the process for funding CDBG public services /45 participants	See Exhibit for public comments	All comments accepted	
3	Neighborhood Opportunity (NOF) Public Meeting – District 2 – 12/10/24	Residents/Community Organizations	Questions and comments were focused on Federal Programs, community resources (I.e. Home Repair Programs)	See Exhibit for public comments	All comments accepted	
4	NOF Public Meeting – District 5 12/18/24	Residents/Community Organizations	Questions and comments were focused on Federal Programs, community resources (I.e. Home Repair Programs)	See Exhibit for public comments	All comments accepted	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	DONcast Meetings (Districts 1–7 + Citywide) Eight sessions March 11 March 18 March 19 March 20 March 25 March 26 (2) March 27	Non-specified – citywide. Residents & community leaders	Presentation on the Con Plan and announce the surveys. Comments were about the use of funds, home repair program, awareness, and access to the services/over 400 participants	See Exhibit for public comments	All comments accepted	
6	Resident Survey March 12 to April 14, 2025 The surveys were sent out via email, social media, flyers, and the City’s website	Non-specified - citywide	Comments were on housing and community development needs, priorities, City services, and NRSAs - 424 responses	See comments above.	All comments accepted	https://www.surveymonkey.com/r/2025DetComm
7	Agency Survey March 12 to April 14, 2025	Service Providers and City Departments	Comments on housing and community development needs, provider capacity,	See comments above	All comments accepted	https://www.surveymonkey.com/r/2025DetAgency

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
	The surveys were sent out via email, social media, flyers, and the City's website		funding allocations and service delivery of HUD grant as well as NRSAs /30 agency responses			
8	Virtual Resident Priority Meeting April 22, 2025,	Non-specified - citywide	Needs for urgent home repairs, clearer and more accessible housing programs, and better city responsiveness. The need for stronger neighborhoods, youth services, and economic programs /55 participants	See Exhibit for public comments	All comments accepted	
9	Virtual Resident Priority Meeting April 24, 2025	Non-specified - citywide	Comments were on affordable housing, better public services, and stronger neighborhood infrastructure. Also, comments were about improved homelessness prevention, job creation, and economic activity/30 participants - meeting	See Exhibit for public comments	All comments accepted	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
10	In-person Neighborhood Feedback Session #1 June 3, 2025	Non-specified & NRSA	Presentation on the Annual Action Plan and NRSA priorities and budget allocation/37 participants	See Exhibit for public comments	All comments accepted	
11	In-person Neighborhood Feedback Session #2 June 5, 2025	Non-specified & NRSA	Presentation on the Annual Action Plan and NRSA priorities and budget allocation/44 participants	See Exhibit for public comments	All comments accepted	
12	Virtual Public Meeting June 18, 2025	Non-specified & NRSA	Presentation on the Annual Action Plan and NRSA priorities and budget allocation/32 participants	See Exhibit for public comments	All comments accepted	
13	30-day public comment period June 25 to July 25, 2025	Non-specified - citywide	Draft FY 2025-2029 Consolidated Plan & FY 2025-2026 Annual Action Plan	See Exhibit for public comments	All comments accepted	
14	30-day public comment period June 25 to July 5, 2025	Non-specified - citywide	Draft FY 2020-2024 NRSA application	See Exhibit for public comments	All comments accepted	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
15	Public Hearing #1 – Detroit City Council Committee (Discussion) July 17, 2025	Non-specified - citywide	Draft FY 2025-2029 Consolidated Plan & FY 2025-2026 Annual Action Plan. Draft FY 2025-2029 NRSA application 137 participants	See Exhibit for public comments	All comments accepted	
16	Public Hearing #2– Detroit City Council for approval (Discussion) July 22, 2025	City Council	Draft FY 2025-2029 Consolidated Plan & FY 2025-2026 Annual Action Plan. Draft FY 2025-2029 NRSA application 217 participants	See Exhibit for public comments	All comments accepted	

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The Needs Assessment examines a variety of issues related to demographics, affordable housing, special needs housing, and homelessness. The analysis also considers different household types such as small, large, elderly, and disabled to understand their specific household characteristics and needs. Household incomes provide a good basis for classifying household types because programs such as the CDBG and HOME program are based on specific household income classifications. The Needs Assessment looks at extremely low-income households (incomes at or below 30% of Area Median Income (AMI)); very low-income households (incomes between 31 and 50 percent of AMI); and moderate-income households (incomes between 51 and 80% of AMI). The purpose of the analysis is to identify household types and racial/ethnic groups with the greatest needs.

The Needs Assessment is a component part of the overall Consolidated Plan and contains the following sections:

- Housing Needs Assessment
- Disproportionately Greater Need
- Public Housing
- Homeless Needs Assessment
- Non-Homeless Special Needs Assessment
- Non-Housing Community Development Needs

Specific groups which are identified as having housing needs include Black/African Americans, Hispanics, single parent households, the elderly, and the homeless population. The identified housing needs span a variety of issues such as affordability, cost burden, and housing supply and demand. One of the themes from the study is that incomes influence where households can afford to live and the type of housing that is available. In Detroit, incomes are low and thus limit a household's ability to afford housing choice. The housing that may be available to households with lower incomes could be clustered in certain neighborhoods where older housing is located. If this housing is substandard in any way, it could create a situation where repairs are needed but incomes are not high enough to cover the cost of on-going maintenance.

Low incomes also result in households spending an outsized amount of their income on housing. The needs analysis found that in 2020 38% of Detroit households spent more than 30% of their income on housing costs. Such households are at risk for missed rent/mortgage payments, foreclosure, eviction, or being unable to provide for other necessities such as food, clothing, or transportation due to the amount of money being spent on housing costs.

Most of the data tables in this section are populated with default data from the 2016-2020 American Community Survey (ACS) and the 2016-2020 Comprehensive Housing Affordability Strategy (CHAS)

datasets. CHAS datasets are developed for HUD by the U.S. Census Bureau based on the ACS. In addition to these data sources, the Needs Assessment is supplemented by current local data and the most recent 2019-2023 ACS 5-Year estimates and 2017-2021 CHAS to provide greater context as to what is happening in Detroit.

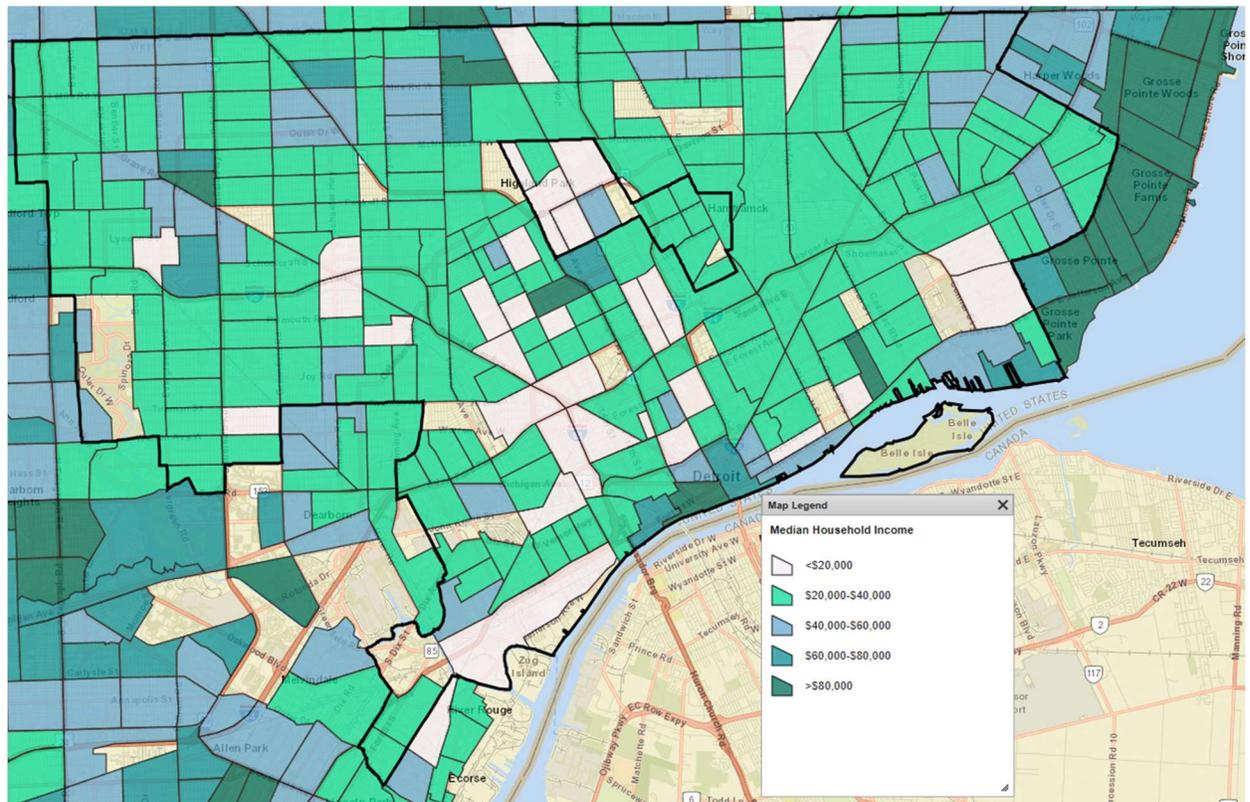
NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

Based on the data provided by HUD, many demographic groups need housing which is both affordable and available. The number of households in the city grew by 6% between 2009 and 2020. The increase in households had many impacts, the foremost being a decrease in housing vacancy which had been a long-term problem for the city. Households relocating to the city often have greater financial means than many current residents, which can contribute positively to the local economy through increased tax revenue and investment in the rehabilitation of underutilized housing stock. Between 2009 and 2020 the median household income grew by 26% to \$32,498. As of 2023, the median household income in Detroit was \$39,575 but still below the national median household income.

Single person households are a demographic with significant needs. The 2016-2020 American Community Survey 5-Year Estimates indicated there were 56,522 single female households and 65,437 single male

Figure 1. Median Household Income



Source: HUD CPD Maps, 2025

households in Detroit. The median income in Detroit for a single female living alone was \$20,905 while the median income for a single male living alone was \$25,163. Comparatively, in 2023 there were 53,915 single females and 61,205 single males living alone, each with median incomes of \$24,510 and \$29,380, respectively. This shows that there was a decline in single person households. Another group of households in need of housing assistance are seniors (65-years older) of which there were 65,626 households in 2020; as of 2023, there were 36,940 senior households. Additionally, seniors tend to live on fixed incomes, have a higher rate of disability, and higher healthcare costs. The map below presents the median household income across the city. What is immediately noticeable is that most census tracts fall below the lowest threshold of \$45,600 per year which indicates high levels of poverty. For context, the median household income in 2023 was \$39,575.

As of 2023, 32% of the population have incomes below the poverty level. The map below presents the percentage of households in poverty by census tract. In Detroit, nearly all census tracts had a poverty rate of greater than 17%.

Figure 2. Poverty Rate



Source: HUD CPD Maps, 2025

The low incomes of Detroit residents translate directly into housing problems. A key housing problem found in Detroit is that households are spending more than 30% of their income on housing costs which indicates cost burdening. Cost burdened households may be at risk for missed payments, foreclosure,

eviction, or inability to provide for other necessities such as food, clothing, or transportation due to the amount of money being spent on housing costs. In 2020, cost burdened households accounted for nearly 38% of all households in Detroit, translating into 103,670 households of which 86,245 were Black households. The 38% of cost burdened households was made up of 17% of regular cost burdened households and 21% of severely cost burdened households.

Extremely low-income renter households experience tremendous hardship. Based on the 2020 HUD data, 86% of extremely low-income renter households (33,790 households) experienced severe cost burdening. Similarly, 83% of extremely low-income owner households were cost burdened, inclusive of homeowners. Based on the 2017-2021 CHAS data, 85% of extremely low-income renter households were cost burdened, while 83% of extremely low-income owner households. This indicates that the trends have remained relatively the same.

Extremely low-income renter households are vulnerable to substandard housing issues, as 1,815 households (61%) lived in substandard conditions in 2020. Similarly, extremely low-income owner households experienced substandard housing conditions at a rate of 48% in 2020. Overcrowding is not an acute problem in the city but still tends to affect extremely low-income renter households the greatest. Based on the 2020 data, 58% of overcrowding in renter housing occurred in housing units occupied by households which are extremely low-income.

Demographics	Base Year: 2009	Most Recent Year: 2020	% Change
Population	690,075	672,350	-3%
Households	255,740	270,445	6%
Median Income	\$25,764	\$32,498	26%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

While decennial Census data shows a population decline between 2009 and 2020, the City of Detroit has formally challenged the Census Bureau’s post-2020 population estimates. The City also filed a lawsuit regarding the federal housing data used by the Bureau and relied upon by HUD. These legal efforts led to a successful outcome: the Census Bureau revised its previous population counts upward, reflecting a population increase. As of 2024, Detroit’s population has grown slightly—by 1%—to 645,705 residents.

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	90,015	46,265	55,235	22,815	56,120
Small Family Households	25,855	17,080	18,425	8,535	23,705
Large Family Households	6,920	4,350	4,895	1,885	4,280
Household contains at least one person 62-74 years of age	18,675	9,320	12,490	5,440	14,440
Household contains at least one person aged 75 or older	8,810	6,150	6,455	2,645	5,955
Households with one or more children 6 years old or younger	16,130	8,930	7,790	2,505	5,350

Table 6 - Total Households Table

Data 2016-2020 CHAS
Source:

Housing Needs Summary Tables

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

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	1,815	450	560	150	2,975	1,125	430	635	135	2,325
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	795	260	235	85	1,375	230	205	105	0	540
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	1,240	460	780	165	2,645	470	275	475	170	1,390
Housing cost burden greater than 50% of income (and none of the above problems)	33,790	4,680	685	20	39,175	12,570	1,790	730	90	15,180
Housing cost burden greater than 30% of income (and none of the above problems)	7,430	13,665	6,820	730	28,645	6,475	4,460	3,375	880	15,190

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Zero/negative Income (and none of the above problems)	7,695	0	0	0	7,695	3,380	0	0	0	3,380

Table 7 – Housing Problems Table

Data 2016-2020 CHAS

Source:

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

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	37,640	5,855	2,260	415	46,170	14,395	2,695	1,945	395	19,430
Having none of four housing problems	23,405	20,215	24,535	9,225	77,380	14,570	17,500	26,490	12,780	71,340
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0

Table 8 – Housing Problems 2
Data 2016-2020 CHAS
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	14,280	8,010	2,460	24,750	5,810	2,055	1,480	9,345
Large Related	3,780	1,355	310	5,445	1,335	420	135	1,890
Elderly	9,520	3,055	1,055	13,630	8,115	2,635	1,695	12,445
Other	16,250	6,460	3,825	26,535	4,755	1,350	850	6,955
Total need by income	43,830	18,880	7,650	70,360	20,015	6,460	4,160	30,635

Table 9 – Cost Burden > 30%

Data 2016-2020 CHAS

Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	0	0	1,550	1,550	3,685	300	0	3,985
Large Related	0	0	150	150	775	110	50	935
Elderly	6,555	835	175	7,565	5,110	925	360	6,395
Other	0	13,700	2,255	15,955	3,470	0	0	3,470
Total need by income	6,555	14,535	4,130	25,220	13,040	1,335	410	14,785

Table 10 – Cost Burden > 50%

Data 2016-2020 CHAS

Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	1,460	475	560	125	2,620	605	345	265	75	1,290
Multiple, unrelated family households	520	180	350	80	1,130	135	135	310	80	660
Other, non-family households	170	65	104	45	384	10	0	4	20	34
Total need by income	2,150	720	1,014	250	4,134	750	480	579	175	1,984

Table 11 – Crowding Information – 1/2

Data 2016-2020 CHAS

Source:

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

Table 12 – Crowding Information – 2/2

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

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

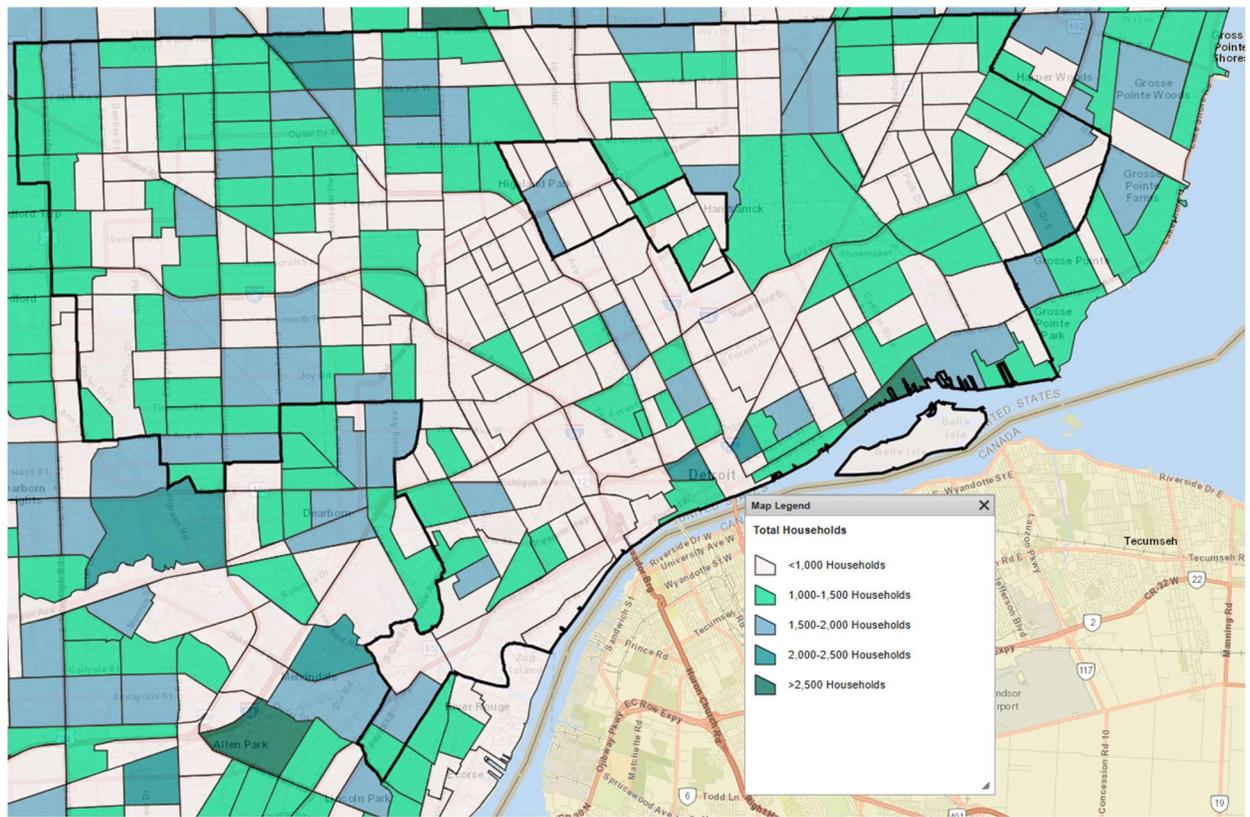
The 2016-2020 American Community Survey 5-Year Estimates indicate there were 56,522 single female households and 65,437 single male households in Detroit. In 2020, the median income in Detroit for a single female living alone was \$20,905 while the median income for a single male living alone was \$25,163. Both demographic groups have very low incomes which also contribute to housing problems like severe cost burdening because at such low incomes housing choices and options become limited. Using the metric of housing costs not exceeding 30% of income, the rents which would be affordable to single

females and males would be \$523 and \$542 a month, respectively. Based on the 2019-2023 ACS data, the affordable rent for a single female living alone increased to \$614, while increasing to \$642 for a single male. According to HUD's 2020 Fair Market rent data, the average monthly rent for a one-bedroom unit in Detroit (Detroit-Warren-Livonia HUD Metro) was \$764 (per HUD's FY2020 Fair Market Rent Documentation System). When adding the cost of utilities, the potential for housing cost burden remain high for single person households who are at or below the median income. Since 2020, the FMR for a one-bedroom unit in Detroit has risen to \$930 a month for 2025, illustrating how prices have risen over the last five years affecting affordability.

Another group of households in need of housing assistance are seniors (65-years and older). According to data provided by the 2016-2020 ACS, there were 65,626 senior households in Detroit. While not all senior households are single person households, there is a risk that these households may eventually become single person households. Additionally, seniors tend to live on fixed incomes and have higher healthcare costs which limit the amount of money they could potentially spend on housing. In 2020, the median income of a senior household in Detroit was \$31,978, which translates to an affordable rent of \$799 per month. As of 2023, the median household income for seniors had risen to \$36,940 but still remains low, and results in limited housing choices for households at this income level.

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

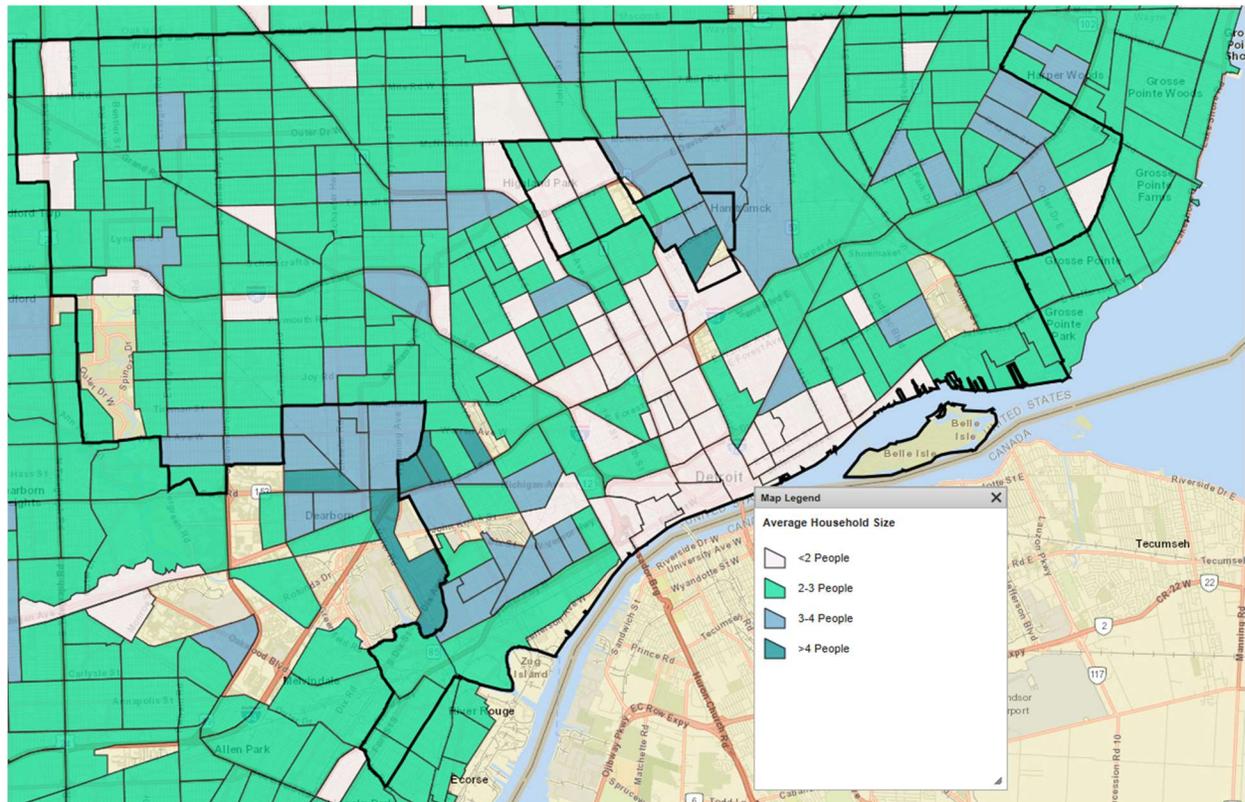
Figure 3. Total Households



Source: HUD CPD Maps, 2025

Outside of Downtown and Midtown where the average household size is between one and two persons, much of the city is composed of 2-3 person households. The northeast and southwest portions of the city have a higher-than-average household size, ranging between 3-4 person households. The map below illustrates the distribution of these households. The most recent data on the number of households in Detroit from the 2023 ACS 1 Year Estimate, show a total of 255,857 households in the City. Dividing Detroit's current population estimate (645,705) by this number of housing units yields an average of approximately 2.5 people per household.

Figure 4. Average Household Size



Source: HUD CPD Maps, 2025

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

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

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

The need for home accessibility and other services for people with disabilities in Detroit is essential because a significant portion of the city’s population has disabilities. Based on disability data from the ACS 2016-2020 for Detroit:

- 20% or 127,504 individuals had a disability.
- 9% or 11,111 children between the ages of 5 and 17 years old had a disability.
- 12% or 18,899 children between the ages of 18 and 34 years old had a disability.
- 26% or 55,701 individuals between 35 and 64 years old had a disability.
- 43% or 41,179 individuals over the age of 65 had a disability.

Looking further at the disability household data, which was obtained via HUD CHAS 2016-2020, about 95,215 households (35%) in Detroit have a household member who qualified as having a disability based on the Census definition. Approximately 23% of households had at least one resident living with ambulatory limitations; of renter households about 21% had a member with an ambulatory limitation. Recognizing the housing and service needs these populations require is critically important. Disabled residents often rely on long-term care and wrap-around services. There may also be an unmet need for long-term housing facilities to assist residents with disabilities.

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

What are the most common housing problems?

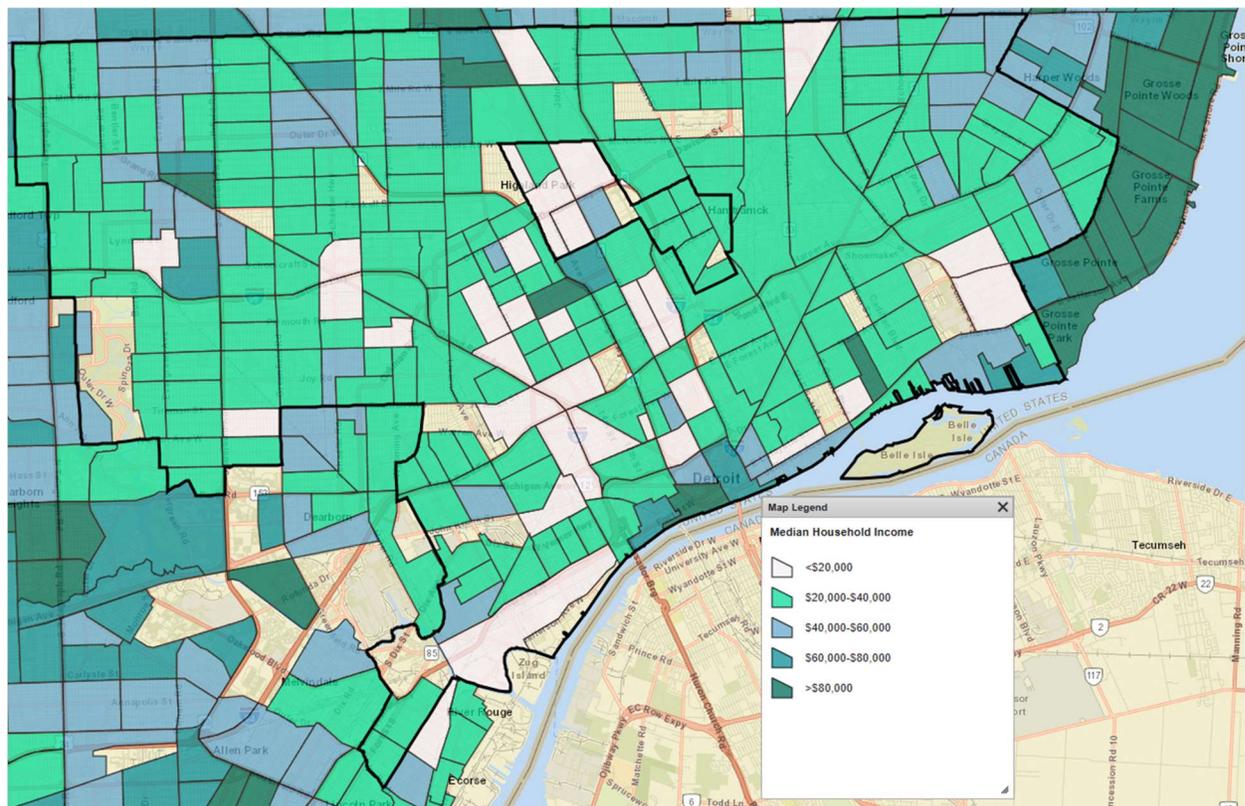
Many Detroit households are spending more than 30% of their income on housing costs. HUD classifies households spending more than 30% of their income on housing costs as “cost burdened”. Households spending more than 50% of their income on housing costs are considered “severely cost burdened”. Cost burdened households may be at risk for missed payments, foreclosure, eviction, or inability to provide for other necessities such as food, clothing, or transportation due to the amount of money being spent on housing costs. In 2020, cost burdened households accounted for nearly 38% of all households in Detroit, translating into 103,670 households of which 86,245 are Black households.

Vacant housing units are another housing problem in Detroit that has persisted for nearly 40 years. The City of Detroit is making progress in addressing the issue with the number of vacant units. The 2020 5 year ACS data shows 87,699 vacant units from 2016-2020. The City has dramatically changed since 2016. The Detroit Land Bank Authority (DLBA) had 29,017 vacant houses in its inventory on February 1, 2016. As on 8/13/2025, the DLBA has only 2,058 vacant houses with 1,555 in the sales process (103 are currently listed for sale) and 503 in the demolition pipeline. Additionally, City staff is able to access more granular, address-level data. By cross referencing address data (including sub-addresses like apartments) with building footprint data, tax assessing records, demolition records, and USPS Delivery Point Validation data, the City staff was able to identify 38,808 vacant residential addresses as of June 2025. Even with the decline in the number of vacant units, many of the vacant housing units are in disrepair or in locations which lack amenities which ultimately decrease their marketability and value. Blight decreases home values, and neighborhoods with a considerable amount of blight do not receive private investment. As blight permeates a neighborhood, the decrease in home values also impacts neighborhood wealth for existing homeowners. Those looking to purchase homes in the neighborhood may be unable to secure loans from lending institutions because underlying asset values are decreasing. In Detroit, the housing stock tends to be older which can increase the chances homes need maintenance and repairs. With median household incomes so low in Detroit, there may be challenges for existing homeowners to afford necessary home repairs. **Are any populations/household types more affected than others by these problems?**

Incomes influence where households can afford to live and the type of housing available. Low incomes tend to limit households to certain neighborhoods that may have an older housing stock with more issues. Of the major racial groups found in Detroit, Black/African American households had the lowest median income at \$31,034 per year in 2020. In contrast, White households had a median income of \$41,123, while Hispanic/Latino households earned \$36,367. Across all racial groups, incomes are low especially when compared to the state median of \$59,234. As of 2023, the gap in income between White and Black/African American households expanded, as White households earned \$51,765 per year, while Black/African

American households earned on \$37,178 per year. The map below presents the distribution of income across the city, with the lowest income population being shown clustered in the center of the city. Male and Female head of households with or without children often struggle to earn enough to support themselves and their family, even though they are working and earning an income. These households could be described as the “working poor” where they earn incomes but may rely on supplemental help and services such as food banks to remain a step ahead of poverty. The federal poverty line for a three-person household was \$26,650 in 2020. Female single parent households in Detroit comprised 26% of all family households and have a median income of \$21,460 in 2020; while male single parent households accounted for about 5% of all family households and had a median income of \$25,436. In 2023, the gap widened between single parent male (\$31,813) and female households (\$26,549). In 2020, married-couple family households accounted for 35% of families and had a median income of \$52,789. This group saw their median comes rise to \$77,104 in 2023.

Figure 5. Median Household Income



Source: HUD CPD Maps, 2025

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

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters

or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

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

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

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

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

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

Housing types for at-risk populations in Detroit include:

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

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

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

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

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

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

Discussion

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

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

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

Introduction

This section focuses on identifying any housing problems occurring at a disproportionately greater rate for racial or ethnic households within extremely low (0-30% AMI), very low (30-50% AMI), low (50-80% AMI), and middle (80-100% AMI) income levels. For extremely low-income households in 2020, 73% had one or more housing problems, however there was no individual racial or ethnic category which had a disproportionate need when compared to the jurisdiction. The largest household group affected was Black/African Americans which had 54,885 households categorized with one or more housing problems and accounted for about 74% of Black/African American households below 30% of AMI.

For very low-income households in 2020, 58% had one or more housing problems, but no individual racial or ethnic group had a disproportionate need when compared to the jurisdiction. Similarly, for low-income households, 26% had one or more housing problems, with Asian households identified as having a disproportionate need compared to the jurisdiction, with 50% of households having on or more of the identified housing problems. For middle-income households, 11% had one or more housing problems and of those, Asian households were identified as having a disproportionate need when compared to the jurisdiction with 18% of Asian households experiencing housing problems.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	65,940	24,070	0
White	6,065	2,620	0
Black / African American	54,885	18,935	0
Asian	570	565	0
American Indian, Alaska Native	255	55	0
Pacific Islander	14	10	0
Hispanic	3,150	1,450	0

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data 2016-2020 CHAS

Source:

*The four housing problems are:

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

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	26,675	19,595	0
White	2,595	2,135	0
Black / African American	21,780	14,700	0
Asian	370	215	0
American Indian, Alaska Native	75	140	0
Pacific Islander	0	4	0
Hispanic	1,340	1,595	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data 2016-2020 CHAS

Source:

*The four housing problems are:

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

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	14,400	40,835	0
White	1,475	4,295	0
Black / African American	11,860	31,455	0
Asian	290	285	0
American Indian, Alaska Native	25	240	0
Pacific Islander	0	15	0
Hispanic	555	3,690	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data 2016-2020 CHAS

Source:

*The four housing problems are:

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

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,425	20,390	0
White	400	2,490	0
Black / African American	1,860	15,835	0
Asian	55	255	0
American Indian, Alaska Native	0	95	0
Pacific Islander	0	0	0
Hispanic	55	1,040	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data 2016-2020 CHAS

Source:

*The four housing problems are:

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

Discussion

The 2020 CHAS data provided by HUD shows that in aggregate across the City of Detroit about 109,440 households, which accounts for 51% of all households, had one or more of the four housing problems defined by HUD. The concentration of housing problems tends to intensify at lower incomes particularly those with incomes below 30% of AMI, while the percentage of households with housing problems decreases at the upper end of the income spectrum.

In Detroit, for households between 0-30% of AMI about 73% experienced one or more housing problems in 2020. For households between 30-50% of AMI and 50- 80% of AMI, 58% and 26% respectively experienced one or more housing problems. While for households at 80% to 100% of AMI, 11% experienced one or more housing problems. Within each of the income cohorts, differences are experienced by the various racial and ethnic groups. The information below presents an analysis and discussion of the income and racial groups which experienced a disproportionately greater need based on the IDIS HUD tables.

- Table 13: Extremely Low Income (0% - 30% of AMI)
 - For the jurisdiction, 73% of the households had one or more housing problems in 2020.
 - No racial or ethnic category had a disproportionate need when compared to the jurisdiction.
 - The largest household group was Black/African Americans which had 54,885 households categorized with one or more housing problem and accounted for about 74% of Black/African American households below 30% of AMI in 2020.
 - Of the racial and ethnic groups which had a greater percentage of housing problems than the jurisdiction, there was difference of 1 percentage point between that group (Black/African American) and the jurisdiction.

- Table 14: Very Low-Income (30% -50% of AMI)
 - For the jurisdiction, 58% of the households had one or more housing problems in 2020.
 - No racial or ethnic category had a disproportionate need when compared to the jurisdiction.

- The largest household group was Black/African Americans which had 21,780 households categorized with one or more housing problem and accounted for about 60% of Black/African American households between 30% and 50% of AMI in 2020.
 - Of the racial and ethnic groups which had a greater percentage of housing problems than the jurisdiction, there was difference of 3 percentage point between that group (Asian) and the jurisdiction. In total, there were 370 Asian households which had one or more of the identified housing problems.
- Table 15: Low Income (50% -80% of AMI)
 - For the jurisdiction, 26% of the households had one or more housing problems in 2020.
 - Asian households had a disproportionate need when compared to the jurisdiction with 50% of these households having one or more of the four housing problems. In total, there were 290 Asian households which had one or more of the identified housing problems in 2020.
 - The largest household group was Black/African Americans which had 11,860 households categorized with one or more housing problem and accounted for about 27% of Black/African American households 50% and 80% of AMI.
 - Table 16: Middle-Income (80% - 100% of AMI)
 - For the jurisdiction, 11% or 2,425 households had one or more housing problems in 2020.
 - No racial or ethnic category had a disproportionate need when compared to the jurisdiction.

In addition to looking at the 2020 CHAS data, the 2017-2021 CHAS data was utilized to see if there were any major changes with regards to housing problems in Detroit. From the 2021 CHAS data, there were 99,685 households in Detroit that had one or more of the housing problems. This translates into 51% of all households. Extremely low income households accounted for 59% of all households with at least one of the housing problems. Based on the 2021 CHAS data, all racial and ethnic groups have a similar percentage of households with housing problems, but Black/African American households have the largest absolute numbers at 82,600 households.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

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

Introduction

This section focuses on identifying households which have severe housing problems that result in a disproportionately greater need. For extremely low-income households in 2020, 58% had severe housing problems, however there was no individual racial or ethnic category which had a disproportionate need when compared to the jurisdiction. For very low-income households, 18% had severe housing problems with Asian and American Indian racial groups experiencing disproportionate need. For low-income households in 2020, 8% had severe housing problems, but no individual racial or ethnic group had a disproportionate need when compared to the jurisdiction. For middle-income households, only 4% had severe housing problems, with Asian households being identified as having a disproportionate need when compared to the jurisdiction. Approximately 8% of Asian households experienced severe housing problems.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	52,035	37,975	0
White	4,875	3,815	0
Black / African American	43,250	30,565	0
Asian	490	645	0
American Indian, Alaska Native	245	65	0
Pacific Islander	14	15	0
Hispanic	2,325	2,280	0

Table 17 – Severe Housing Problems 0 - 30% AMI

Data 2016-2020 CHAS

Source:

*The four severe housing problems are:

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

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	8,550	37,715	0
White	1,050	3,675	0
Black / African American	6,650	29,830	0
Asian	235	345	0
American Indian, Alaska Native	55	155	0
Pacific Islander	0	4	0
Hispanic	285	2,650	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data 2016-2020 CHAS

Source:

*The four severe housing problems are:

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

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,205	51,025	0
White	590	5,180	0
Black / African American	3,140	40,170	0
Asian	200	375	0
American Indian, Alaska Native	0	265	0
Pacific Islander	0	15	0
Hispanic	175	4,065	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data 2016-2020 CHAS

Source:

*The four severe housing problems are:

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

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	810	22,005	0
White	55	2,835	0
Black / African American	685	17,015	0
Asian	25	285	0
American Indian, Alaska Native	0	95	0
Pacific Islander	0	0	0
Hispanic	40	1,045	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data 2016-2020 CHAS

Source:

*The four severe housing problems are:

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

Discussion

The 2020 CHAS data provided by HUD shows that in aggregate across the City of Detroit about 65,600 households, which accounts for 31% of all households, have severe housing problems as defined by HUD. The concentration of housing problems tends to intensify at lower incomes particularly those with incomes below 30% of AMI, while the percentage of households with housing problems decreases at the upper end of the income spectrum.

In Detroit, for households between 0-30% of AMI about 58% experienced severe housing problems in 2020. For households between 30-50% of AMI and 50- 80% of AMI, 18% and 8% respectively experienced severe housing problems. While for households between 80% to 100% of AMI, 4% experienced severe problems. The information below presents an analysis and discussion of the income and racial groups experiencing a disproportionately greater need based on the IDIS HUD tables.

- Table 17: Extremely Low-Income (0% - 30% of AMI)
 - For the jurisdiction, 58% of the households had severe housing problems in 2020.
 - No significant racial or ethnic category had a disproportionate need when compared to the jurisdiction.
 - The largest household group was Black/African Americans which had 43,250 households categorized with severe housing problems and accounted for about 59% of Black/African American households below 30% of AMI in 2020.
 - Of the racial and ethnic groups which had a greater percentage of housing problems than the jurisdiction, American Indian/Alaska Native had at rate of 79% but the housing problems were associated with only 245 households.

- Table 18: Very Low-Income (30% -50% of AMI)
 - For the jurisdiction, 18% of the households had severe housing problems in 2020.
 - Asian and American Indian racial groups had a disproportionate need when compared to the jurisdiction. About 41% of Asian and 26% American Indian households experienced severe housing problems in 2020.
 - The largest household group was Black/African Americans which had 6,605 households with severe housing problems and accounted for about 22% of Black/African American households between 30% and 50% of AMI in 2020.

- Table 19: Low Income (50% -80% of AMI)
 - For the jurisdiction, 8% of the households had severe housing problems in 2020.
 - Asians had a disproportionate need when compared to the jurisdiction at 35% or 200 households.
 - The largest household group was Black/African Americans which had 3,140 households categorized with severe housing problems and accounted for about 7% of Black/African American households between 50% and 80% of AMI.

- Table 20: Middle-Income (80% - 100% of AMI)
 - For the jurisdiction, 4% or 810 households had a severe housing problem in 2020.
 - Asian households were identified as having a disproportionate need when compared to the jurisdiction with 8% of Asian households experiencing severe housing problems.
 - While not experiencing disproportionate need, about 4% of Hispanic households are experiencing severe housing problems.

In addition to looking at the 2020 CHAS data, the 2017-2021 CHAS data was utilized to see if there were any major changes with regards to severe housing problems in Detroit. From the 2021 CHAS data, there were 59,680 households in Detroit that had one or more of the severe housing problems. This translates into 30% of all households. Extremely low income households accounted for 78% of all households with at least one of the housing problems. Based on the 2021 CHAS data, all racial and ethnic groups have a similar percentage of households with housing problems, but Black/African American households have the largest absolute numbers at 49,060 households.

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

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

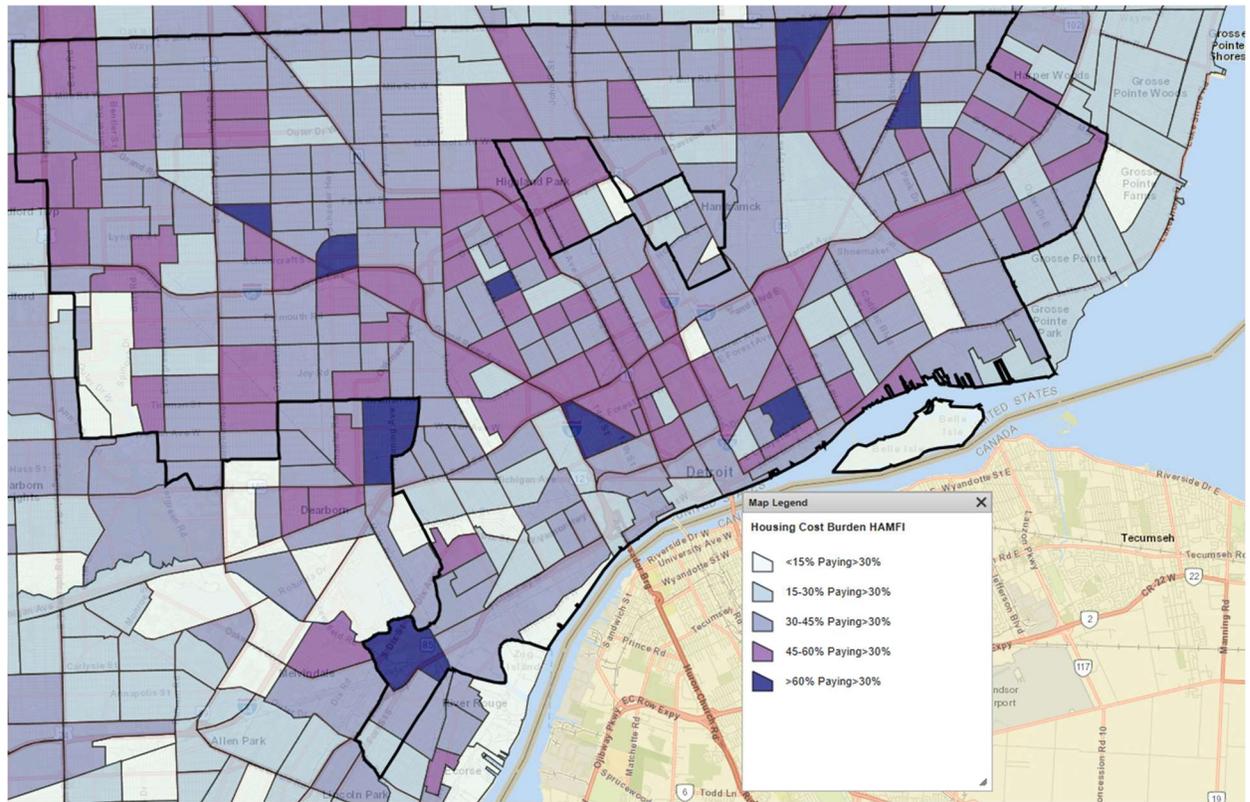
Introduction:

This section focuses on identifying households in greater need as a result of being housing cost burdened. The analysis looks at households without cost burdens (less than or equal to 30%), with cost burdens of (30-50%), and with severe cost burdens (more than 50%). While the cost burdening rate was high for Detroit households at 17% in 2020, no racial or ethnic groups had a disproportionate greater need. Similarly, 21% of households were severely cost burdened, but no one racial or ethnic group experienced a disproportionate greater need.

Housing cost burden is defined as spending 30% or more of household income on housing. Severely burdened can be defined as spending 50% or more of household income on housing. Based on these definitions, cost burdening is a serious problem for both owner and renter households in Detroit. Table 21 shows there were 46,580 households (17%) which spent between 30% and 50% of their income on housing in 2020, while 57,090 households (21%) spent greater than 50% of their income on housing. The discussion in this section describes the racial and ethnic groups which experienced a disproportionate concentration of cost burdening than the jurisdiction as a whole.

The map below presents cost burdened households across Detroit. There is no clear pattern of cost burdening, rather cost burdened households exist across nearly all census tracts.

Figure 6. Housing Cost Burden



Source: HUD CPD Maps, 2025

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	154,750	46,580	57,090	12,035
White	21,880	4,435	5,365	1,190
Black / African American	114,670	38,720	47,525	9,445
Asian	2,625	420	570	410

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
American Indian, Alaska Native	595	55	300	39
Pacific Islander	24	4	14	0
Hispanic	10,115	2,385	2,315	695

Table 21 – Greater Need: Housing Cost Burdens AMI

Data 2016-2020 CHAS

Source:

Discussion:

A disproportionately greater need exists when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the jurisdiction as a whole. Table 21 presents the number of households without cost burdens (less than or equal to 30%), with cost burdens of (30-50%), with severe cost burdens (more than 50%), and households for which cost burden was not computed due to negative incomes. The information below presents an analysis and discussion of cost burdening issues as they relate to race.

- Cost burden of between 30 to 50% of income
 - In Detroit, 46,580 households, which accounts for 17% of all households, were cost burdened in 2020.
 - The largest household group was Black/African Americans which had 37,720 households categorized as cost burdened and accounted for about 18% of Black/African American households in 2020.
 - There were 420 Asian households considered cost burdened in Detroit which accounts for about 10% of all Asian households. There is a nearly 7% differential cost burdened Asian households and the jurisdiction.
 - Based on the HUD cost burden data from 2020, no racial or ethnic groups experienced a disproportionate greater need.

- Cost burden greater than 50% of income
 - In Detroit, 57,090 households, which account for 21% of all households, were severely cost burdened in 2020.
 - The largest household group was Black/African Americans which had 47,525 households categorized as severely cost burdened and accounted for about 23% of Black/African American households in 2020.
 - There were 570 Asian households considered severely cost burdened in Detroit which accounts for about 14% of all Asian households.
 - Based on the HUD cost burden data from 2020, no racial or ethnic groups experienced a disproportionate greater need.

In addition to looking at the 2020 CHAS data, the 2017-2021 CHAS data was utilized to see if there were any major changes with regards to cost burdening in Detroit. From the 2021 CHAS data, there were 94,769 households in Detroit that were experiencing some form of cost burden. This translates into 38% of all

households. Based on the 2021 CHAS data, all racial and ethnic groups have a similar percentage of cost burdening, but Black/African American households have the largest absolute numbers at 79,320 households.

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

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

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

Based on the income by race data provided by the ACS 2016-2020, the racial and ethnic categories which have the greatest need were Black/African American and American Indian and Alaska Natives. When compared to the majority White population which had a median household income of \$41,123, the median income of Black/African American households (\$31,034) was about 76% of White households, and the median income of American Indian and Alaska Natives (\$30,831) was 75% of White households. Racial and ethnic groups such as Asian and Hispanic households had a slightly higher median income than the jurisdiction. Asian households had median household incomes of \$47,500 while Hispanic households had median incomes of \$36,367.

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

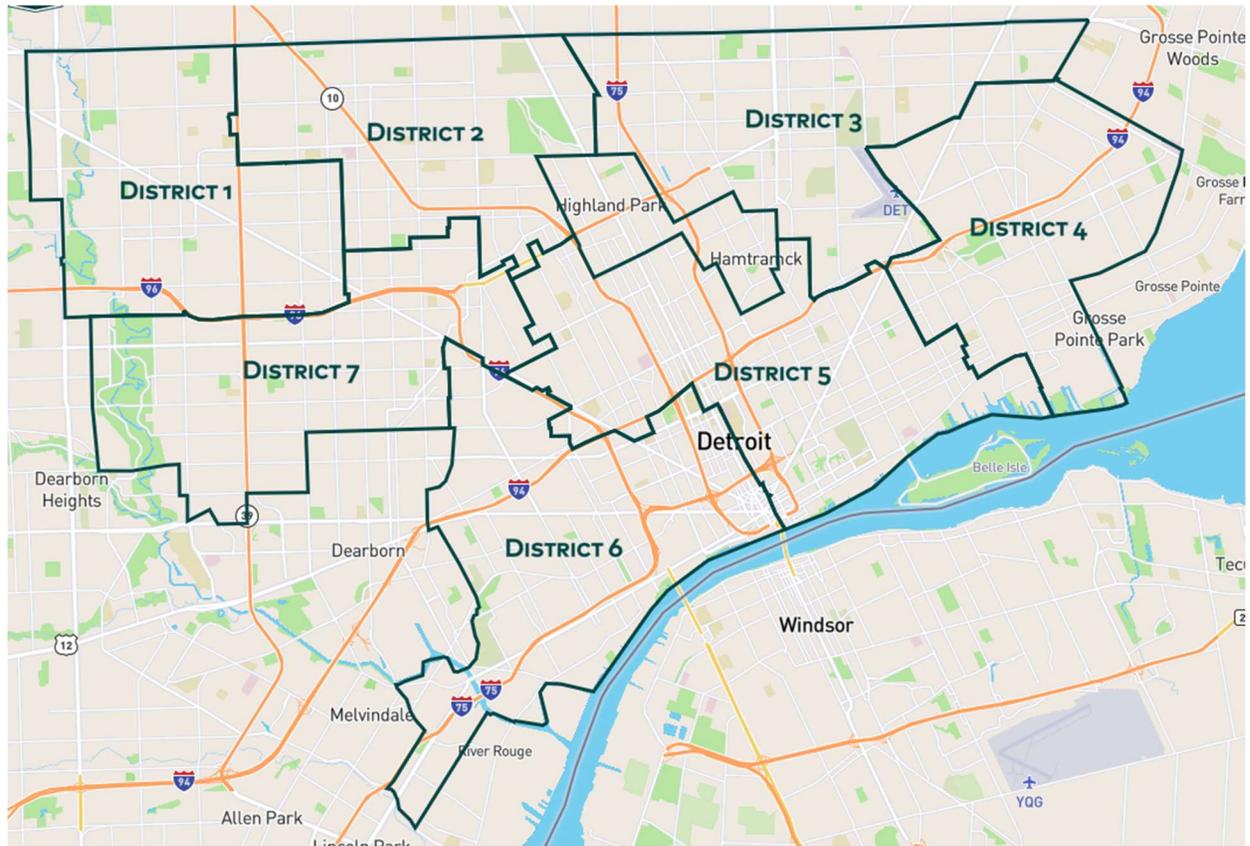
Education levels of Detroit residents show a disparity between the non-white minority population and the White population. This educational gap can mean the difference between economic opportunities, higher incomes, and improved housing conditions. Based on an analysis of the data from 2020, 36% of the White population ages 25 and above had a bachelor's degree compared to only 13% of the Black/African American population and 8% of the Hispanic population.

A positive correlation between income and education exists, i.e., those with higher levels of education have higher incomes and lower levels of poverty. In Detroit, for individuals with just a high school diploma the poverty rate was 31%, while those who held a bachelor's degree or higher have a poverty rate of 10%. To further illustrate the correlation, the median income of a bachelor's degree holder was \$44,148, which was much higher than the median income of a resident with only a high school diploma at \$25,532.

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

In 2020, the poverty rate for Detroit was about 31% and was roughly consistent across all racial and ethnic groups. This data shows that many residents are struggling economically and are also in need of assistance. Geographically, Detroit has a large land area and lower levels of density, therefore the population is spread across many neighborhoods. In 2020, Black/African Americans constituted over 76% of the population and lived in all neighborhoods. The White population accounted for about 11% of the total and was also spread throughout the city but has greater concentrations in the eastern part of the city, particularly in City Council Districts Three and Five. Hispanic/Latino residents comprised about 8% of the population and were generally concentrated in the southwest portion of the city which aligns with City Council District Six. Asian residents, who accounted for 1% of the population, were concentrated in City Council District Three. The Asian population is composed of a variety of groups including the Hmong, who began arriving in Detroit in the 1970's from Southeast Asia.

Figure 7. City Council District Map



Source: City of Detroit

NA-35 Public Housing – 91.205(b)

Introduction

In 1933 the City of Detroit established the Detroit Housing Commission (DHC) under the Michigan Housing Facilities Act. Throughout DHC's 87-year history their mission has been to provide safe, decent, and affordable housing for low- and moderate-income people. DHC is the largest owner of rental housing in the City of Detroit with nearly 4,000 units. The DHC also operates the Housing Choice Voucher Program (HCV), formerly known as Section 8, through its Assisted Housing Department. Households that are able to secure public housing or HCVs are predominately very low-income, and in many cases extremely low-income. Given the number of low-income households in Detroit, demand for affordable housing is strong while the current supply is insufficient. The DHC managed 3,388 public housing units across 43 properties within the city. As of early 2024, approximately 76% of these units were occupied, housing around 4,557 residents. The average household income among tenants is \$16,278, with most households earning less than 30% of the area median income. The average waiting time for public housing applicants is approximately 23 months per the DHC website.

Having a secure and safe place to live is the most immediate need of residents in public housing and/or those who have Housing Choice vouchers. Aside from a secure and safe home, is the need for employment opportunities which pay wages that enable households to move up and out of public housing. Additionally, access to educational resources can help individuals gain new skills, knowledge, and training to be competitive in the workforce. The city is actively working on improving the condition of public housing units in Detroit to ensure residents have a safe place to live.

The City provides about 5,550 housing vouchers to qualifying households. Of the total housing vouchers available, 448 housing vouchers were given to the elderly, while 1,488 vouchers were given to families with a disabled member, highlighting the fragility of the population. Residents of public housing, or households with vouchers are predominately low-income, and in many cases extremely low-income.

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

Totals in Use

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

Table 22 - Public Housing by Program Type

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

Data PIC (PIH Information Center)

Source:

Characteristics of Residents

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

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project-based	Tenant-based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
# of Families requesting accessibility features	0	289	2,641	5,546	26	5,483	0	22
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data PIC (PIH Information Center)
Source:

Race of Residents

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

Table 24 – Race of Public Housing Residents by Program Type

Data PIC (PIH Information Center)
Source:

Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
Veterans Affairs Supportive Housing	Family Unification Program	Disabled *							
Hispanic	0	2	12	27	0	27	0	0	0
Not Hispanic	0	287	2,629	5,519	26	5,456	0	22	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data PIC (PIH Information Center)

Source:

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

Based on the 2024 PIC data, there were a total of 5,546 housing vouchers being used by households in Detroit. Within the total housing voucher numbers: 448 housing vouchers for the elderly, and 1,488 vouchers are for disabled families. The request for accessibility features in housing units is universal throughout the entire public housing stock with all 5,546 families requesting such features. Section 504 of the Rehabilitation Act of 1973 prohibits discrimination on the basis of disability in any program or activity that receives financial assistance from any federal agency, including HUD. Generally, the need for unit accessibility is associated with wheelchair access. Modifications are also done to support hearing impairments and occasionally modifications to support visual impairments.

The DHC complies with the Americans with Disabilities Act (ADA) requirements in its housing stock and programs. As part of its capital improvement program and repositioning strategy, DHC is working to update all its units to comply with ADA and all other regulations.

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

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

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

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

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

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

In addition to rental housing, the DHC has developed a homeownership program where eligible public housing residents can achieve homeownership. Using its Housing choice Voucher (HCV) and Family Self Sufficiency Programs (FSS) jointly, families are offered a homeownership option during annual recertifications and home ownership information sessions.

Discussion

The DHC created a comprehensive Capital Improvement Plan which addresses the needs of properties based on the guidance received from the Physical Needs Assessment. The Plan was created and is executed in accordance with HUD guidance and regulations. DHC has effectively expended and administered the Capital Fund Program (CFP) to improve and preserve DHC properties. This resulted in substantial improvements of Public Housing Authority (PHAS) indicators and Real Estate Assessment Center (REAC) property inspections scores. The Detroit Housing Commission has used the projected CFP award amount of \$22,067,705 for 2023-2027 budget projections.

Key highlights from the Capital Improvement Plan include:

- Sheridan I & II Exterior Upgrades including new windows
- Riverbend Restoration
- Renovations to 18 Vacant Scattered Site Units
- Renovations to 18 Vacant Units at Sheridan
- Renovations to 6 Vacant Units at Riverbend
- Renovations to 14 Vacant Units at Sojourner Truth
- Renovations to 12 Vacant Units at State Fair
- Site Improvements at Smith Homes
- Smith Homes Exterior Upgrades including new windows
- Boiler Replacement at Greenbrook Manor
- Kitchen and Bathroom Renovations to Sojourner Truth
- Bathroom Renovations to Smith Homes
- Fire Alarm System Replacements at Woodbridge Senior Village Buildings 503 & 404
- Window Replacement at multiple Scattered Site Units
- Vacant unit renovations at multiple sites throughout the DHC portfolio
- Boiler and chiller upgrades, hot water tank replacements, furnace replacements, generator replacements, and security upgrades at multiple sites throughout the DHC portfolio.

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

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

Detroit, like communities across the country, uses the Point-in-Time (PIT) count to track homelessness numbers from year to year. The PIT is required by U.S. Department of Housing and Urban Development (HUD). It is a snapshot count of sheltered and unsheltered individuals experiencing homelessness on a single night in January. The count helps HUD and local communities assess the extent of homelessness and track trends over time. Homelessness is defined by HUD using the following definitions below.

- The Stewart B. McKinney Homeless Assistance Act defines the “homeless” or “homeless individual” or “homeless person” as an individual who lacks a fixed, regular, and adequate nighttime residence; and has a primary nighttime residence that is a public or private place not meant for human habitation; or
- Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or

• Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution. The latest PIT count from 2024^[1] count showed that 50% (873 individuals) of Detroit’s homeless population are single adults over the age of 25. The data also shows that 83% of all sheltered and unsheltered homeless individuals were Black/African Americans, which indicates Black/African Americans are overrepresented given their proportion of the general population is only 77%.

Detroit has seen a flux in unsheltered homelessness throughout the years. Data shows the incidence of unsheltered homelessness increased from 202 individuals in 2022 to 305 individuals in 2024. However, that number then decreased to 215 individuals in 2025; see more details below.

-
-
- ^[1] <https://www.handetroit.org/reports#PIT4>

The 2023 PIT^[1] found:

- 1,280 individuals in emergency shelter/transitional housing/safe haven programs, of which:
 - 476 individuals were part of a family unit with minors;
 - 710 individuals were single adults over the age of 25;
 - 93 individuals were unaccompanied youth aged 18-24; and
 - 1 minor under the age of 18 years old.
- An unsheltered count was not conducted in 2023 as it was not required by HUD; therefore, the count from 2022 was carried forward for this year
 - In 2022, 202 individuals were unsheltered. Of these, 190 were single adults and 12 were youth aged 18-24.

The 2024 PIT^[2] found:

- 1,420 individuals in emergency shelter/transitional housing/safe haven programs, of which:
 - 700 individuals were part of a family unit with minors;
 - 609 individuals were single adults over the age of 25;
 - 103 individuals were unaccompanied youth aged 18-24; and

- o 8 minors under the age of 18 years old.
- 305 individuals unsheltered, i.e., sleeping outside/in a vehicle of which:
 - o 9 households comprised of 28 persons were part of a family unit with at least 1 child and 1 adult

The 2025 PIT found:

- 1,442 individuals in emergency shelter/transitional housing/safe haven programs, of which:
 - o 609 individuals were part of a family unit with minors;
 - o 726 individuals were single adults over the age of 25;
 - o 104 individuals were unaccompanied youth aged 18-24; and
 - o 3 minors under the age of 18 years old.
- An unsheltered PIT was not conducted in 2025 as it was not required by HUD. However, the City of Detroit conducted its own Unsheltered Count to ensure the City had an annual count of unsheltered homelessness each year. This count followed the same methodology as the PIT count. This count found:
 - o 215 individuals unsheltered of which 2 households comprised of 9 persons were part of a family unit with at least 2 child and 7 adults.

The chart below further outlines the household breakdown of homelessness according to the last HUD PIT conducted in 2024.

^[1] <https://www.handetroit.org/s/2023-PIT-summary-final-rvsddg.pdf>

^[2] <https://www.handetroit.org/s/PIT-2024-Summary-Final.pdf>

Population	Estimate the # of persons experiencing homelessness on a given night		# of persons becoming homeless each year	# of persons exiting homelessness each year	# of persons experiencing homelessness
	Sheltered	Unsheltered			
Persons in Households with Adult(s) and Child(ren)	700	28	1,609	1,507	2,470
Persons in Households with Only Children	8	1	37	36	41
Persons in Households with Only Adults	609	264	2,468	2,308	3,334
Chronically Homeless Individuals	251	108	835	735	1,249
Veterans	111	7	265	268	386
Unaccompanied Youth	103	12	541	576	711
Persons with HIV	8	10	64	67	85

Data Source: PIT Count 2024, COC; : HMIS COC APR 2024 MI 501 - Housing Inventory Chart

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

The majority of individuals experiencing homelessness in Detroit are single adults. Based on the PIT data, there were 873 individuals over the age of 25 and an additional 115 unaccompanied youth aged 18-24. Another significant proportion of homeless residents were households with children; there were a total of 728 persons in that family cohort of which 455 were children.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
Ethnicity:	Sheltered:	Unsheltered (optional)

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

In Detroit during 2024, there were 728 households with at least one adult and one child experiencing literal homelessness as defined by HUD. Of these households, 631 were in emergency shelters, 69 were in transitional shelters, and 28 households were unsheltered.

According to the 2024 PIT data, there were 118 veteran households experiencing homelessness of which 111 individuals were living in emergency shelter, transitional housing or safe havens while 7 were experiencing unsheltered homelessness. Veteran households seeking assistance were almost exclusively male individuals, with one female veteran household having children present. Many veterans receive wrap around services at their local VA hospital which is located near the downtown area and therefore seek housing nearby; a neighborhood that is often in higher demand than other areas of the city.

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

In Detroit, homelessness disproportionately affects Black residents compared to other racial and ethnic groups. The 2024 PIT data also shows that 83% of all sheltered and unsheltered homeless individuals were Black/African Americans. This is notably higher than their representation in the general population, which is about 77.2% based on the 2020 U.S. Census data. White individuals make up about 9.5% of Detroit's overall population but represent a smaller percentage of those experiencing homelessness. Other racial and ethnic groups, including Hispanic or Latino individuals (8.0% of the general population), Asian individuals (1.6%), and Native American or Alaska Native individuals (0.7%), are also present in the homeless population but in much smaller proportions. See the chart below for more info.

Race:	Sheltered:	Unsheltered (optional)
White	76	32
Black or African American	1,176	253
Asian	4	0
American Indian or Alaska Native	78	2
Pacific Islander	2	1
Multiple Races	15	9
Ethnicity:	Sheltered:	Unsheltered (optional)
Non-Hispanic/Non-Latino	1,327	289
Hispanic/Latino	81	16

Data Source: PIT 2024- <https://www.handetroit.org/s/2024-Detailed-PIT-Report-Final.pdf>

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The Detroit CoC has recorded a variance in unsheltered numbers throughout the years, some of which can be attributed to how the PIT has been conducted from year to year. In 2019 the PIT was hindered due to a polar vortex which limited outreach teams' ability to conduct a thorough count. For the next few years, the country was battling the COVID-19 pandemic, which impacted the community's ability to conduct and obtain accurate PIT counts. Strong efforts were made in 2022 PIT, but social distancing and other public health measures were still in place.

The 2024 PIT was the first count since 2018 that could be viewed as "business as usual" after the pandemic. This count did show an increase in the number of people experiencing unsheltered homelessness, increasing from 202 in 2022 to 305 in 2024. Between these two years, Detroit made improvements in how the system both planned and executed the count. For instance, Detroit moved from counting all engagements via paper to using an electronic tool, thus reducing the number of errors in tallying counts. Another change occurred in late 2021 when the City published an outward facing [Street Outreach Request Form](#) allowing anyone in the community to request outreach services. This drastically increased access to Street Outreach as well as allowed staff to better understand where people are experiencing unsheltered homelessness in the community. This data was then used to target outreach teams during the night of the PIT, which could have also led to an increased count as the system did a better job at tracking where people reside.

These processes were in place and utilized during the 2025 Unsheltered Count, which implemented the same methodology as the HUD required PIT count. The 2025 Unsheltered Count was conducted on January 29th from 10pm-2am and counted 215 individuals. This number showed a reduction from the 2024 unsheltered count and more closely aligned with the 2022 PIT count.

When comparing the two sheltered PIT counts from 2019 to 2025, the sheltered homeless population declined slightly -- there were 1,879 individuals in shelters or transitional housing in 2019 compared to 1,442 in 2025. This decline can be attributed to a decrease in Veteran shelter and transitional housing programs. In addition, HUD shifted focus to permanent supportive housing and rapid rehousing programs which led to the closure of transitional housing programs. To compensate for these losses, the City of Detroit brought online new emergency shelter beds in late 2023 and 2024.

Discussion:

The PIT data shows that approximately 18% of the homeless population experience unsheltered homelessness. The city, along with non-profits, target their resources to help alleviate the plight of the homeless population. Services are available which help transition the homeless population towards long-term stability.

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

Introduction:

The special needs population in Detroit are a select grouping of individuals which include frail and non-frail elderly, persons with physical disabilities, persons with mental or behavioral disabilities, and persons with HIV/AIDS.

The Census classifies disabilities in the following categories: those having a hearing or vision impairment, ambulatory limitation, cognitive limitation, and self-care or independent living situation. While there is some overlap between seniors and the disabled, many disabled individuals are not seniors and are in fact part of the working age population. Looking further at the disability household data, which was obtained via HUD CHAS 2016-2020, about 35% of households in Detroit have at least one member with a disability based on the Census definition. Another special needs population found in Detroit are those persons affected with HIV/AIDS. In Detroit there were 5,287 individuals in 2023 with HIV/AIDS. The disease touches every demographic, from the young to the elderly, Black, White, Hispanic, Native American, and Asian populations. The effect of the disease on individuals and families can be devastating due to health complications, social stigma, and disruptions to everyday life.

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

HOPWA

Current HOPWA formula use:	
Cumulative cases of AIDS reported	1,575
Area incidence of AIDS	.2% of population in Detroit
Rate per population	214 per 100,000
Number of new cases prior year (3 years of data)	206
Rate per population (3 years of data)	214 per 100,000
Current HIV surveillance data:	
Number of Persons living with HIC (PLWH)	5,776
Area Prevalence (PLWH per population)	.8% of the population in Detroit
Number of new HIV cases reported last year	218

Table 26 – HOPWA Data

Data CDC HIV Surveillance
Source:

HIV Housing Need (HOPWA Grantees Only)

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

Table 27 – HIV Housing Need

Data HOPWA CAPER and HOPWA Beneficiary Verification Worksheet
Source:

Describe the characteristics of special needs populations in your community:

Some special needs populations found in Detroit include the elderly and those individuals with disabilities. For the purposes of this analysis seniors can be classified as individuals or households headed by those 65-years and older. According to data provided by the 2020 ACS, there were 65,626 senior households in Detroit. Additionally, seniors tend to live on fixed incomes and have higher healthcare costs which may limit the amount of money they could spend on housing. Many elderly and/or disabled individuals rely on SSI as a primary source of income which can limit their housing choice and ability to pay for other costs that may arise.

The Census classifies disabilities in the following categories: those having a hearing or vision impairment, ambulatory limitation, cognitive limitation, and self-care or independent living situation. While there is some overlap between seniors and the disabled, many disabled individuals are not seniors and are in fact part of the working age population. Looking further at the disability household data, which was obtained via HUD CHAS 2016-2020, about 37% of households in Detroit had at least one member with a disability based on the Census definition. Disability data from the Census shows that in Detroit:

- 20% or 127,504 individuals had some sort of disability.
- 9% or 11,111 children between the ages of 5 and 17 years old had a disability.
- 26% or 55,701 individuals between 35 and 64 years old had a disability.
- 43% or 41,179 individuals over the age of 65 had a disability.

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

Another special needs population found in Detroit are those persons affected with HIV/AIDS. The disease touches every demographic, from the young to the elderly, Black, White, Hispanic, Native American, and Asian populations. In Detroit there were 5,614 individuals with HIV/AIDS. The effect of the disease on individuals and families can be devastating due to health complications, social stigma, and disruptions to everyday life.

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

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

- Dedicated elderly housing with universal design.
- Tenant based rental assistance or permanent supportive housing for individuals with disabilities but are living independently.

- Housing for the HIV/AIDS population.
 - Transitional housing for those wanting to move to independent living but need more structured housing to address barriers that may be preventing them from moving to independence.
 - Housing for people with multiple diagnoses needs greater accessibility, short term emergency housing and shelters designed to address immediate crises.

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

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

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

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

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

In Detroit there were an estimated 5,614 individuals living with and diagnosed with HIV in 2022. The table below presents the breakdown of this data by sex. About 78% (4,366 individuals) of the HIV infected population were male, 22% (1,248 individuals) were female, and 3% (162 individuals) were transgender.

	Estimated Prevalence		Current Disease Status			
	Living with Diagnosed HIV Infection in 2023		HIV (not AIDS)		AIDS	
Sex at birth	Number	Percent	Number	Percent	Number	Percent
Males	4,366	76%	3,967	76%	399	73%
Females	1,248	22%	1,123	21%	125	23%
Transgender	162	3%	140	3%	22	4%
Total	5,776	100%	5,230	100%	546	100%

Source: Michigan Department of Health and Human Services, Annual HIV Prevalence Report, Persons living with HIV December 31, 2022

Of those living with HIV, the highest percentages were in residents over the age of 40. This demographic accounts for 62%, or 3,479 individuals, of persons living with the HIV infection in Detroit. That is not to say the focus should be on older residents. In fact, new documented cases of HIV were highest among residents under the age of 30. Interventions must continue to ensure education and safe practices are shared among all age cohorts in Detroit.

	Estimated Prevalence		Current Disease Status			
	Living with Diagnosed HIV Infection in 2023		HIV (not AIDS)		AIDS	
Age at end of year	Number	Percent	Number	Percent	Number	Percent
<14	5	0%	5	0%	0	0%
15-19	22	0%	22	0%	0	0%
20-29	600	11%	563	11%	37	7%
30-39	1,508	27%	1,383	27%	125	24%
40-49	1,033	18%	919	18%	114	22%
50-59	1,218	22%	1,098	22%	120	23%
60+	1,228	22%	1,100	22%	128	24%
Total	5,614	100%	5,090	100%	524	100%

Source: Michigan Department of Health and Human Services, Annual HIV Prevalence Report, Persons living with HIV December 31, 2022

The racial group that is most impacted by the HIV infection are Black/African Americans. This demographic accounted for 85% of individuals living with the HIV infection in Detroit. The White population accounted for 7% of the total HIV infections. These rates closely mimic the racial and ethnic composition of the city.

Race/Ethnicity	Estimated Prevalence		Current Disease Status			
	Living with Diagnosed HIV Infection in 2023		HIV (not AIDS)		AIDS	
	Number	Percent	Number	Percent	Number	Percent
Black	4,784	85%	4,330	85%	454	87%
Hispanic	301	5%	273	5%	28	5%
White	366	7%	337	7%	29	6%
Other	163	3%	150	3%	13	2%
Total	5,614	100%	5,090	100%	524	100%
Source: Michigan Department of Health and Human Services, Annual HIV Prevalence Report, Persons living with HIV December 31, 2022						

If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))

Discussion:

Detroit's special needs population includes frail and non-frail elderly, individuals with physical, mental, or behavioral disabilities, and those with HIV/AIDS. According to HUD CHAS data from 2016-2020, about 37% of households in Detroit had at least one member with a disability. Disabilities are categorized by the Census as hearing or vision impairments, ambulatory limitations, cognitive limitations, and self-care or independent living situations. Additionally, there were 5,614 individuals living with HIV/AIDS in Detroit, affecting a diverse demographic. The impact of HIV/AIDS on individuals and families can be severe, leading to health complications, social stigma, and disruptions in daily life.

The special needs population in Detroit requires stability and dignity, which can be achieved through housing and comprehensive social services. Essential housing services include dedicated elderly housing with universal design, tenant-based rental assistance, and transitional housing for those with HIV/AIDS. Supportive services encompass case management, substance abuse treatment, mental health services, in-home caregivers, and job training programs. Addressing these needs helps integrate the special needs population into a broader society, ensuring they can lead full and active lives.

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

Describe the jurisdiction’s need for Public Facilities:

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

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

How were these needs determined?

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

Describe the jurisdiction’s need for Public Improvements:

Large scale projects are usually identified and funded through the City's capital planning process, however a small percentage of CDBG funds are sometimes used on public improvements. HRD manages a commercial facade improvement program with CDBG funding as well as funding small scale infrastructure improvement projects such as new sidewalks and repaved streets and alleys. These types of new infrastructure projects are usually associated with new low-to-moderate-income housing developments but can also be in existing neighborhoods where there is an unmet need.

How were these needs determined?

Commercial facade improvements are assessed through the Department's annual CDBG request for Proposals for Commercial Facade Improvements and document analysis. Document analyses include City Plan of Master Policies, Capital Agenda, Detroit Works Project, and Market Value Analysis when determining how to fund other public improvement projects.

Describe the jurisdiction’s need for Public Services:

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

Education:

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

Senior Services:

- Transportation

- Health Services

Public Safety:

- Community/Neighborhood Based

Health Services:

- Health Services to Low/Moderate Income

Youth Recreation:

- Arts
- Sports

How were these needs determined?

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

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

Detroit's residents deserve decent, safe, and affordable housing which provides a sense of dignity and community. The housing market analysis uses information about housing problems, tenure, income levels, and household type to analyze the housing needs for the city. The analysis looks at various elements of housing needs, public housing, special needs housing, community development needs, and homelessness.

Based on the analysis, it is determined that housing needs in the City of Detroit are driven by the number of low income households with limited choices for necessities including housing. The Needs Assessments in 2020 reports Detroit's median income was \$32,498, which indicates a low level of income for many Detroit residents. This is important given incomes influence housing purchases, rental decisions, and overall housing affordability.

- **Most common** → “One of the most commonly reported” to acknowledge variability across data sources.
- **“Not up to date”** → Replaced with “lack features or infrastructure that align with current building standards” for specificity.
- **“May not meet the needs of today's buyers”** → Framed in terms of market expectations or standards.
- **“Hardships” and “depressed values”** → Reworded to focus on documented challenges and associations, avoiding unsupported causality.

As it stands today, the most prevalent housing problem in Detroit is cost burdening, whereby households spend more than 30% of their income on housing costs. In Detroit, 38% of households were cost burdened in 2020. As households are forced to spend a higher percentage of their income on housing costs, disposable income for food, healthcare, education, childcare, and transportation becomes limited. In Detroit, there were 103,670 households experiencing some form of cost burdening in 2020. Aside from the cost of housing, there are issues with the housing stock as most units in Detroit are older and not up to date. In 2020, about 53% of all units in the city were built before 1950. An older housing stock can create several challenges including a rise in housing with lead-based paint, greater maintenance needs, and homes that may not meet the needs of today's buyers. These issues can cause hardships for both owners and renters, and over time, lead to depressed values across neighborhoods.

Outside of the private market for housing, the city's public housing and federal voucher program help bridge some of the housing gaps in Detroit. The city has a housing portfolio of public housing consisting of 3,968 units and has access to 5,893 federal housing vouchers which can be used by recipients. The city also has programs designed to improve the quality of life for residents. Additionally, the city has programs and housing options for various population groups including seniors, the disabled, homeless, and for individuals with HIV/AIDS.

The data which informs the analysis comes from the Department of Housing and Urban Development (HUD) and the U.S. Census. Specific datasets used include the American Community Survey (ACS), Comprehensive Housing Affordability Strategy (CHAS), OntheMap, and local data from the City of Detroit. In addition to these data sources, the Market Analysis is supplemented by current local data and the most recent 2019-2023 ACS 5-Year estimates and 2017-2021 CHAS to provide greater context as to what has been occurring in Detroit.

Below is a summary of findings for each section in the Market Analysis. Greater details on the topic area can be found within the respective section.

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

Introduction

Detroit has a long history of development that has favored single-family homes over denser urban forms. The single-family home was a typology that became more common and accessible for the average person during the 1950's and 1960's just as the City of Detroit and the auto industry was expanding. This predisposition to single-family homes gives Detroit a more suburban character than many other older American cities, which tend to be denser and contain more multi-unit and mixed-use buildings. Data provided below, by the US Census, shows that in 2020, 66% of Detroit's housing stock consisted of 1-unit detached structures. About 9% of the housing stock consisted of 2-4-unit structures and only 6% consisted of 5-19 units. Larger apartment structures consisting of 20 or more units made up about 13% of housing units. In 2023, single family homes accounted for 65% of all units, a slight decrease from 2020.

Based on the popularity of single-family homes, units with three or more bedrooms are the predominate housing type and account for about 59% of all units in 2020. Of owner households in 2020, about 77% had three or more bedrooms. While in renter households three-or-more bedroom units accounted for 43% of the housing stock.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	234,695	66%
1-unit, attached structure	25,315	7%
2-4 units	30,555	9%
5-19 units	19,895	6%
20 or more units	46,305	13%
Mobile Home, boat, RV, van, etc.	1,375	0%
Total	358,140	100%

Table 28 – Residential Properties by Unit Number

Data 2016-2020 ACS

Source:

Figure 1 below presents the distribution and percentage of structures with between 5 and 19 residential units across Detroit's Census Tracts. These medium size structures made up about 6% of the total housing stock and are generally clustered along the periphery of Downtown and Midtown.

Figure 1. Percent of Structures with 5-19 Units



Source: HUD CPD Maps, 2025

Figure 2 presents the distribution and percentage of structures with 20 or greater residential units across Detroit's Census Tracts in 2020. These large size structures made up about 13% of the total housing stock and are generally clustered in the downtown core and surrounding areas. The greatest intensity can be found in Downtown and Midtown with structures of 20 units or greater accounting for more than 60% of the housing units in some areas .

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	320	0%	6,565	5%
1 bedroom	2,445	2%	34,195	24%
2 bedrooms	26,465	21%	40,690	29%
3 or more bedrooms	99,515	77%	60,255	43%
Total	128,745	100%	141,705	101%

Table 29 – Unit Size by Tenure

Data 2016-2020 ACS

Source:

The 2023 ACS 1 Year Estimate shows the city was split between owner (54%) and renter (46%) households.,. Figure 3 below presents the distribution and percentage of owner-occupied housing across Detroit’s Census Tracts. What is noticeable is that concentrations of homeownership tend to take place outside the urban core, particularly along the northwest and northeast portions of the city. In these areas, homeownership ranges between 50% and 75% of all households.

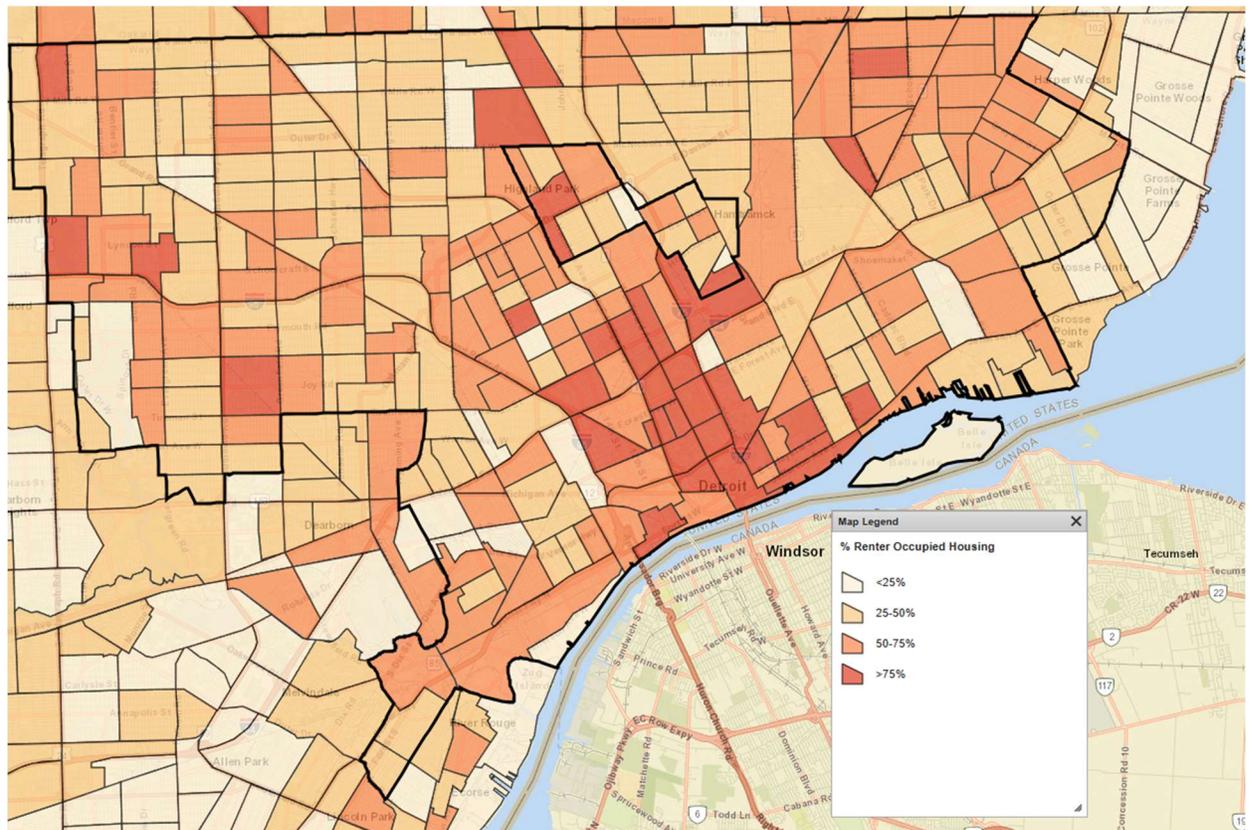
Figure 3. Percent of Owner-Occupied Housing



Source: HUD CPD Maps, 2025

Figure 4 below presents the distribution and percentage of renter-occupied housing across Detroit's Census Tracts. Concentrations of rental units are mostly within the urban core, with rental units accounting for more than 75% of the units. In recent years, neighborhoods such as downtown and midtown have experienced increases in rental units, particularly along Woodward Avenue.

Figure 4. Percent of Renter-Occupied Housing



Source: HUD CPD Maps, 2025

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

The City of Detroit is focused on two fronts: preserving the affordability and quality of the existing housing stock and producing new housing that is priced affordably to people across a range of incomes. Both approaches support the city's objective to provide residents with quality affordable housing and options accessible to public transit, employment hubs, and other essential services. The city has made significant commitments to affordable housing, including taking aggressive action to preserve affordable housing and requiring new multifamily housing developments receiving direct public financial support to include at least 20% of units affordable to households making up to 80% of Area Median Income (AMI) (with public financial support defined as investments of federal housing development funds or the sale of public land at below market value), whereas market rate developments are required to provide 15% of the units as affordable.¹

The City of Detroit also established the Affordable Housing Leverage Fund (AHLF) in 2020 and primarily finances affordable multi-family rental housing. The AHLF invests in housing that is affordable to households at or below 60% Area Median Income (with consideration of households up to 80% AMI for for-sale projects). As part of the AHLF initiative, the City of Detroit partnered with Local Initiatives Support Corporation (LISC) to create the Detroit Housing for the Future Fund (DHFF) which is a new fund comprised of private investment that will be invested into affordable housing development and preservation in Detroit. The DHFF is designed to deploy private grant and low interest loan capital to complement and leverage public investment through the City of Detroit and Michigan State Housing Development Authority as well as tax credits and other existing affordable housing finance tools.²

The Detroit Housing Commission (DHC) actively manages public housing and administers the voucher program. The DHC has a housing portfolio consisting of 3,968 Public Housing units and 5,893 Housing Choice Vouchers (HVC). They are actively looking to modernize their portfolio and utilize federal, state, and local grants to improve their housing stock. The DHC works with the lowest income households.

Through neighborhood planning, the City is also encouraging the strategic development of new or rehabilitated housing units for households at various income levels. These plans also focus on improving quality of life, neighborhood conditions, and housing affordability. After neighborhood planning is finished, the City takes a strategic approach to implementation, to ensure the vision of the community is realized over time. The neighborhoods where neighborhood plans are complete and the City is focused on implementation, include:

- Grand River Northwest
- Warrendale/Cody-Rouge

¹ <https://detroitmi.gov/document/inclusionary-housing-ordinance-0>

² <https://dhff.org/>

- Livernois/McNichols
- Russel Woods/Nardin Park
- Southwest/Vernor
- Delray
- Greater Corktown
- Rosa Parks/Clairmount
- Eastern Market
- East Riverfront
- Islandview/Greater Villages
- Campau/Banlatown
- Gratiot/7-Mile
- East Warren/Cadieux
- Jefferson Chalmers
- Greater Warren/Conner

Neighborhoods where planning is currently underway include:

- Brightmoor
- Grixdale
- Joe Louis Greenway (24 neighborhoods surrounding the greenway)

Across the neighborhood plans, goals, policies, and implementation strategies are established and then investments are targeted towards low- and moderate-income households. Example strategies from these plans include:

- Supporting new housing and economic development
- Improving connectivity and mobility experience
- Enhancing open space and the public realm
- Improving maintenance of vacant land and integrating green stormwater infrastructure.

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

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

Aside from demolition and blight removal, units with expiring low-income housing tax credits (LIHTC) also pose a risk to the city. Launched in 1986, the LIHTC program uses tax credits to encourage private

developers to create affordable housing.³ Developers qualify for LIHTCs by agreeing to rent units to households with low incomes and to charge rents that are no more than a specified amount. Most tax credit developers choose the option under which the renters must have incomes below 60 percent of the area median income (AMI) and the rents must be no greater than 18 percent (30 percent of 60 percent) of AMI. From 1986 to 1989, federal law required developers to maintain these affordability provisions for at least 15 years. Beginning in 1990, however, new LIHTC properties were required to preserve affordability for 30 years. During the first 15 years, called the initial compliance period, owners must maintain affordability. The second 15 years are known as the extended use period, when owners can leave the LIHTC program through a relief process. Once the 15-year affordability period is over, LIHTC owners who seek and are granted regulatory relief from the program can convert their properties to market-rate units.

There have been 7,179 low-income housing units built under the LIHTC program in Detroit since the year 2010. Of these affordable units, 1,172 were placed in service between 1995 and 1999, which makes them potentially at risk of being converted to market rate units in the next five to ten years because of the changes in market conditions of certain locations and the expiration of tax credits. An example location is the Midtown neighborhood where significant public and private investment has taken place, which has resulted in rapid price and rent escalation. In this area there is a concentration of LIHTC projects near the Woodward Avenue corridor, between Mack and Warren Avenues. These low-income housing developments could potentially be at risk based on the surrounding market pressures.

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

Detroit's population crested in 1950 to about 1.8 million residents and decreased by more than 60 percent over the last 70 years. Only recently has Detroit seen an increase in its population. As residents left the city, the inventory of vacant housing units began to increase. The 2020 ACS 5 Year Estimate, reports 87,699 vacant housing units, while more recent HUD data – aggregated from USPS address records in June 2025 – indicates 80,136. However, City staff was able to access more granular, address-level data. By cross referencing address data (including sub-addresses like apartments) with building footprint data, tax assessing records, demolition records, and USPS Delivery Point Validation data, City staff is able to identify 38,808 vacant residential addresses. .

To further support the City's population, estimate, an accurate count of housing unit loss was also conducted. Since the 2020 Census, only 539 habitable housing units have been lost due to demolition. That is homes that could have been lived in immediately before the structures were demolished due to fire or some other reason. The Census Bureau has since revised its housing unit count for Detroit after acknowledging that not all demolition counts as housing loss.

While there are plenty of housing units available, the existing housing stock is old and many of the units need upgrades. Despite comparatively reasonable rents and sales prices, many Detroiters experience housing problems (substandard housing, overcrowding, and cost burdens). As noted in the Needs Assessment, about 38% of Detroiters experienced some level of housing cost burden in 2021 (CHAS 2017-2021), with 21% of all households having spent more than half their income on housing.

³ https://www.huduser.gov/portal/pdredge/pdr_edge_research_081712.html

Describe the need for specific types of housing:

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

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

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

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

Discussion

In 2020, the city's median income was quite low, at \$32,498 and while the median income rose to \$39,575 in 2023, many households are still cost-burdened, and spending over 30% of their income on housing. This financial strain limits residents' disposable income for necessities like food, healthcare, and transportation. Additionally, Detroit's housing stock is aging, with over half of the city's units built before 1950, leading to issues like lead-based paint, maintenance problems, and depreciating property values. As a result, the city experiences widespread vacancy, blight, and a shortage of suitable housing options, especially in low-income communities.

To address these challenges, the City of Detroit has implemented several initiatives aimed at increasing affordable housing availability. The city manages a housing portfolio of public units and offers federal housing vouchers to support the lowest-income households. Additionally, programs like AHLF and the DHFF aim to finance affordable multi-family housing projects. The city has also targeted neighborhood-specific development plans in areas like Grand River Northwest and Warrendale/Cody-Rouge, where new housing and economic growth are prioritized to serve low- and moderate-income households. These efforts focus on both preserving existing affordable housing and developing new units that cater to a range of income levels.

Despite these efforts, the city faces ongoing risks, particularly the potential loss of affordable housing units. Many low-income units built under the LIHTC program are at risk of being converted to market-rate units as tax credits expire, especially in neighborhoods like Midtown where rising housing prices are a concern. The city needs a variety of housing types, including rental housing for seniors and individuals with disabilities, affordable housing near public transportation, and lead-free homes, to meet the needs of its diverse population.

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

Introduction

Detroit rental and homeownership costs are low compared to other U.S. cities. In 2020, the median home value for Detroit was \$52,700 compared to the statewide home value of \$162,600. The median home value in Detroit increased by 25% between 2009 and 2020. Additionally, between 2020 and 2023 the median value increased 46% to \$76,800, but is still extremely low, as the median home price across the country is more than \$400,000. This is symptomatic of the housing and vacancy challenges that are impacting the city. The low home values are mostly found in older single-family structures which are the predominant type of housing. Conversely, the condominium market, while small, is experiencing rapid price escalations, particularly in prime locations such as Midtown where units are selling for as much as \$500,000. This shows that much of the private sector investment dollars are not flowing to traditional neighborhoods and population groups, but rather to more dense areas of Detroit with the amenities to attract more affluent residents.

As of 2020, the median rent in Detroit was about \$636 per month, which was lower than the state median of \$892. Between 2009 and 2020, the median contract rent rose by 15% which coincides with national rent growth trends. As of 2023, the median contract rent rose further to \$768 per month, while the state median contract rent was \$891 per month. Low-income households inevitably must cope with rising rents because landlords who own housing units that are both safe and affordable, which are generally in short supply, experience greater demand.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2020	% Change
Median Home Value	42,300	52,700	25%
Median Contract Rent	555	636	15%

Table 30 – Cost of Housing

Data 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)
Source:

Rent Paid	Number	%
Less than \$500	41,350	29.2%
\$500-999	88,030	62.1%
\$1,000-1,499	8,840	6.2%
\$1,500-1,999	2,480	1.8%
\$2,000 or more	1,015	0.7%
Total	141,715	100.0%

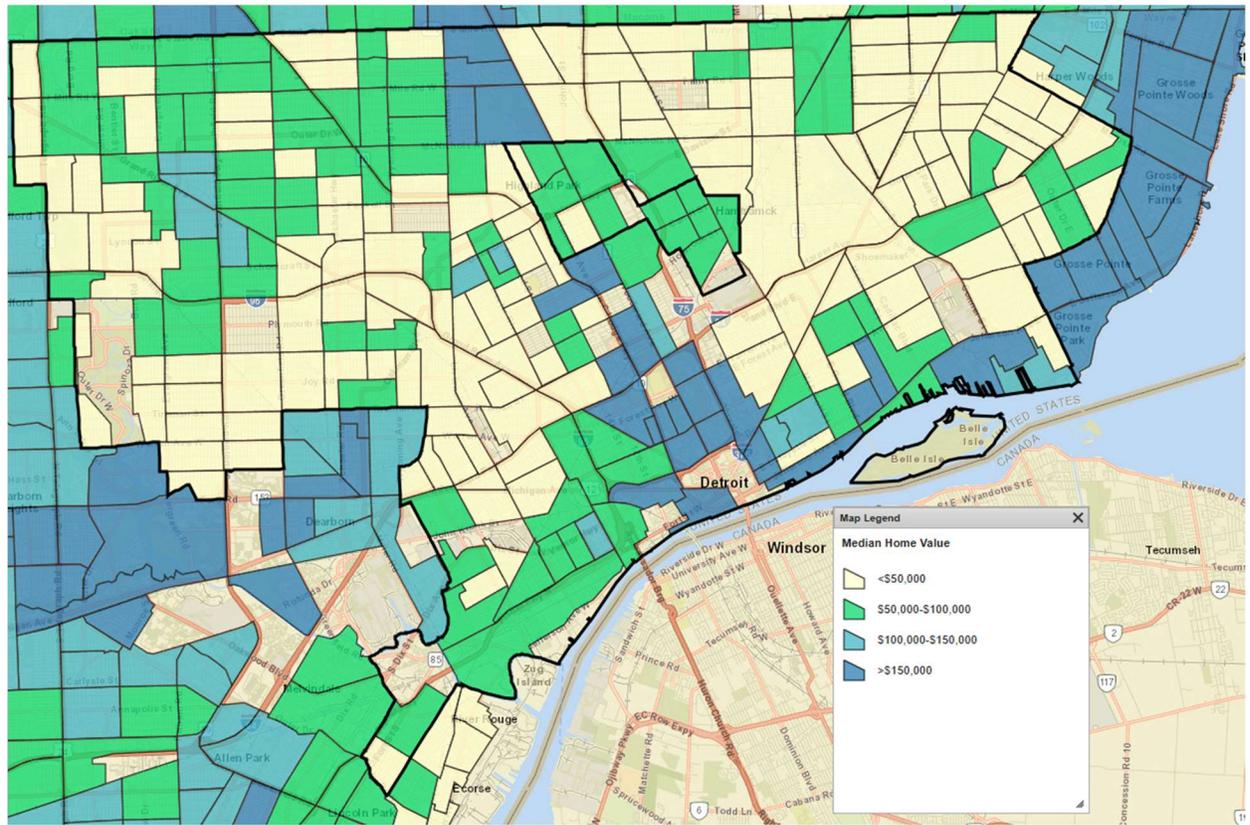
Table 31 - Rent Paid

Data 2016-2020 ACS
Source:

Median Home Values and Rents

Though the 2023 ACS 5 Year estimate reports the median home value in Detroit is \$76,800, there was a slight increase to \$86,400 with the 2023 ACS 1 Year estimate. There is a high degree of variability in home values across the City. Figure 5 below presents the median home value across the city by census tract (HUD 2025 CPD, which is derived from ACS 2016-2021 data). This map shows that there are areas of relative strength (in blue) clustered around the Central Business District and north along the Woodward corridor, along the east Riverfront/East Jefferson corridor, and in historic districts on the north and northwest parts of the City. There are large areas of middle-income housing (green) in the northwest Detroit neighborhoods and spread throughout the City. As housing values improve, there are still a high number of tracts where the median home value was below \$50,000. Between 2009 and 2020 median homes values increased by 25% from \$42,300 to \$52,700, and another 46% between 2020 and 2023.

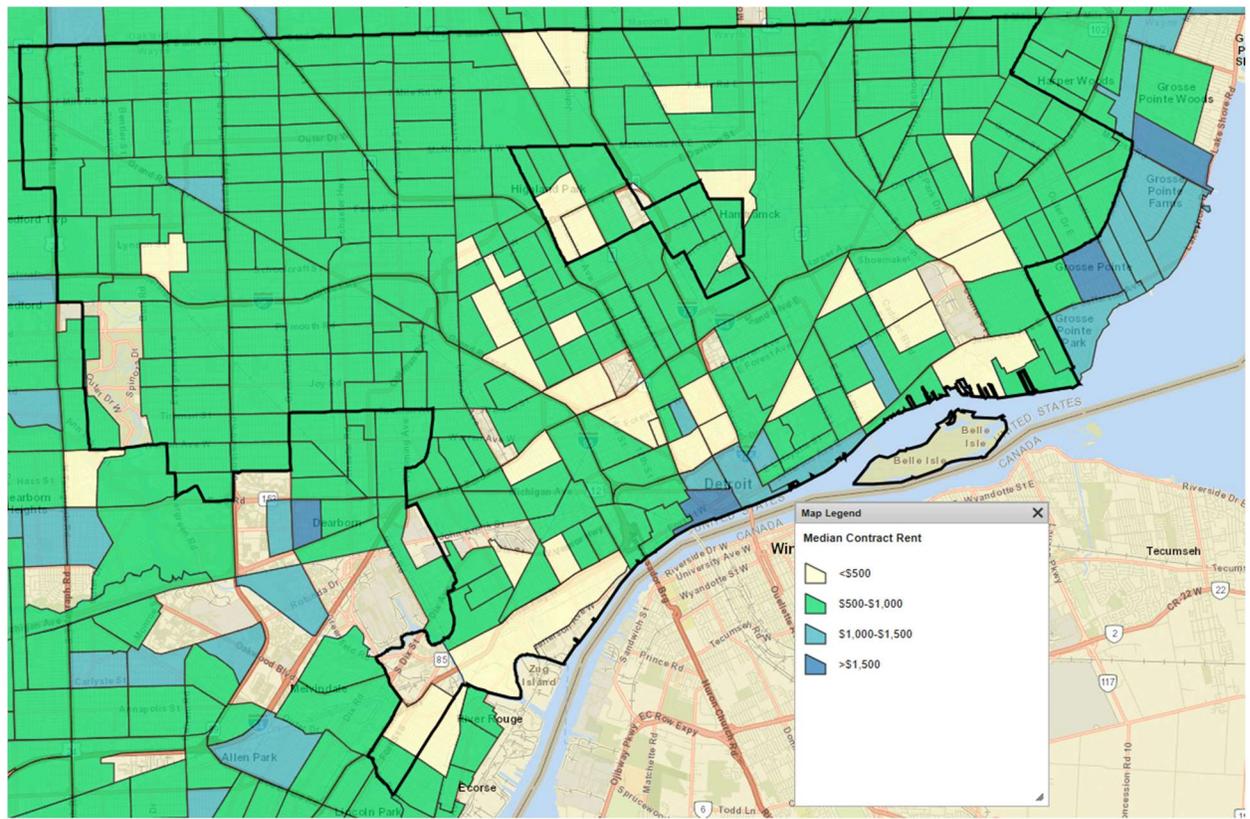
Figure 5. Median Home Value



Source: HUD CPD Maps, 2025

In 2020, the median contract rent in Detroit was \$636 per month and increased to \$768 as of 2023. Figure 6 below presents the median rent across the city by census tract. What is noticeable is that across the city most rents are between \$500 and \$1,000 per month. In areas along the waterfront there are concentrations of rents greater than \$1,500 per month, which is where new development is taking place.

Figure 6. Median Contract Rent



Source: HUD CPD Maps, 2025

Housing Affordability

Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	21,050	No Data
50% HAMFI	66,705	44,550
80% HAMFI	112,260	73,255
100% HAMFI	No Data	87,045
Total	200,015	204,850

Table 32 – Housing Affordability

Data 2016-2020 CHAS
Source:

Monthly Rent

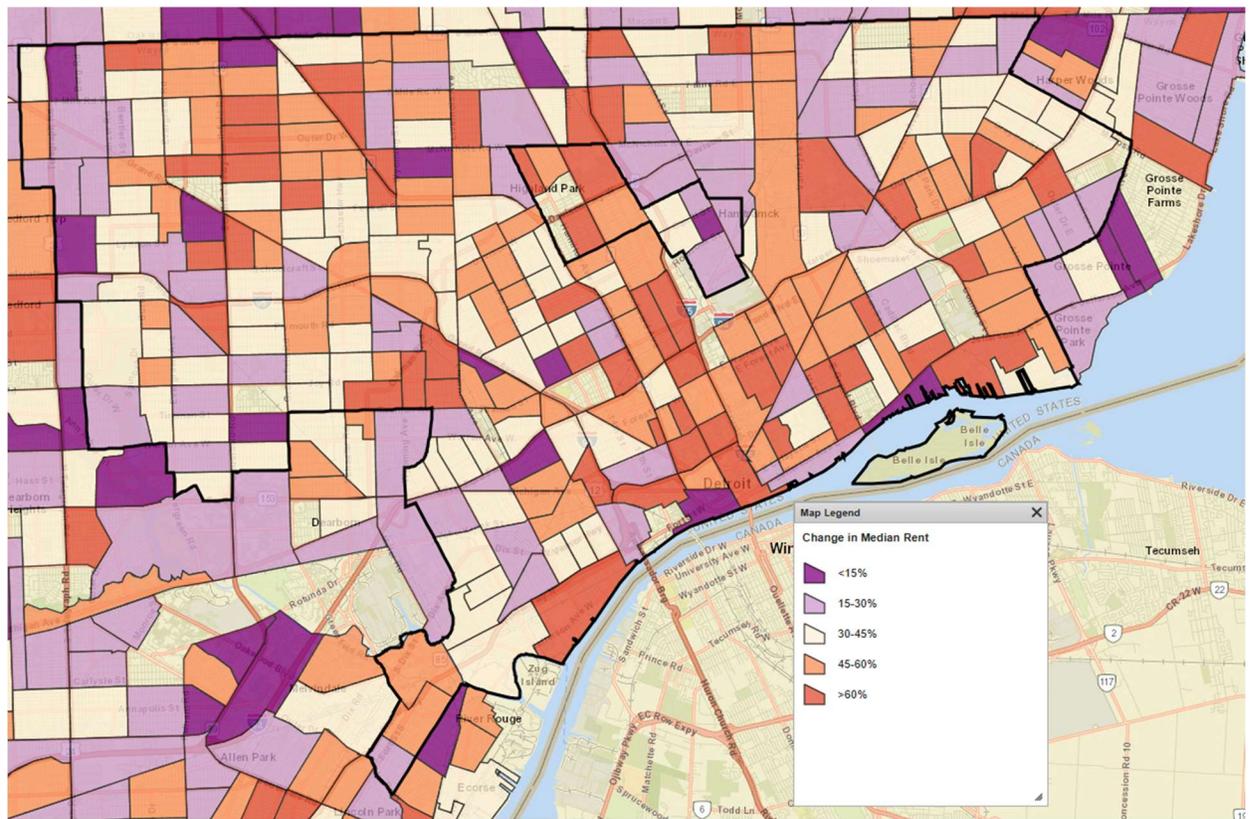
Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	\$845	\$952	\$1,213	\$1,511	\$1,629
High HOME Rent	\$621	\$753	\$967	\$1,261	\$1,371
Low HOME Rent	\$621	\$716	\$858	\$992	\$1,107

Table 33 – Monthly Rent

Data HUD FMR and HOME Rents
Source:

Figure 7 presents the percent change in median rents across Detroit’s Census Tracts. City-wide rents have risen 15% between 2009 and 2020, however, in some census tracts rents have risen at a much faster pace. This is true in the downtown and midtown area where in some case rents have risen by more than 60% as a result of investments taking place in those areas. In general, there is a strong demand for rental units across several neighborhoods in the city which translates into higher prices.

Figure 7. Percent Change in Median Rent



Source: HUD CPD Maps, 2025

Is there sufficient housing for households at all income levels?

While there are many housing units available in Detroit, there is a lack of decent, safe, and affordable housing. The housing needs assessment shows that low-income households tend to have the fewest housing choices, which translates into having a greater propensity of living in units with at least one identified HUD housing issue. The key issue in Detroit is housing cost burdening. About 38% of all households experience some form of cost burdening. A relationship exists between cost burdening and incomes, the lower the income the greater the propensity to experience cost burdening. In Detroit incomes are low, particularly for renter households. While in many cases, households below 30 percent of HAMFI qualify for public housing or vouchers, the waitlists for these programs are long and therefore households cannot rely on these programs with any level of certainty and must pay market rents for potentially substandard housing products.

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

Between 2009 and 2020, the median value of owner-occupied units increased by 25%, and a further 46% by 2023, which translates into less affordable home prices today compared to ten years ago. Additionally, homes in Detroit have gotten older and are in need of greater repair. In the case of owner occupied home repair, many residents are unable to access repair loans from banks because the value of some homes is lower than the level of debt (upside down). Also, appraised values in some neighborhoods are lower than new construction units which would require development cost subsidies. Over the longer term, this may result in a greater decline in value as homes will become less attractive and have an impact on the for-sale market as buyers may be less willing to invest in declining neighborhoods and lenders may be more cautious.

Some of the increase in owner-occupied housing values is likely due to the city's focus on removing blighted and vacant structures. The improvement in the neighborhoods helped stabilize and increase values. Blight has a profound impact on housing values for the remaining occupied units in a neighborhood, as the area may give off the perception of being unsafe or undesirable and therefore decrease price.

For renter households, median contract rents have risen 15%, creating affordability challenges for some of Detroit's most at-risk households. These price increases occurred over a period when median household income increased by 26%, however because of inflation due to the Covid-19 pandemic disposable income has remained low and makes renting difficult for many households.

Even though 30% of households pay less than \$500 a month in rent, which is far below the fair market rent for a one-bedroom unit of \$930, many households experience housing problems including cost burdening. As such, affordability can be tackled by creating pathways toward increasing incomes and unlocking resources for programs which make homes available to low- and moderate-income households. Efforts aimed at this goal should include:

- Education and job training.
- Economic development programs that assist in attracting higher wage jobs to Detroit and retention of existing jobs.

- Improved transportation access.
- Down Payment Assistance.
- Assistance for home repairs/rehabilitation and energy efficient upgrades.
- Deep rental subsidies for extremely low-income renters.
- Financial literacy training.
- Home maintenance training.

By increasing housing affordability and improving incomes, households will experience more financial stability, be able to invest in the long-term upkeep of their homes and stabilize neighborhoods that may still be feeling the aftereffects of the Covid-19 pandemic inflation.

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

The median gross rent for Detroit in 2020 was \$636 per month, which was less than all the 2020 HUD FMR monthly rents. For one-bedroom units, the 2020 HUD FMR rent was \$952 per month which was about 33% greater than the median rent. For two-bedroom units the fair market rent was \$1,213 per month, or 90% greater. Similarly, for three-bedroom units, the 2020 HUD FMR rent was \$1,511 per month and is about 28% greater than the median rent in Detroit. In 2023 the median gross rent for a one-bedroom was \$900, while the median gross rent was \$1,148 for a two-bedroom. In 2025 HUD began requiring communities located in the Detroit-Warren-Livonia Metro to use small area FMRs based on zip codes. Based on the changes for Detroit, the FMR for a one-bedroom was \$930, a two-bedroom had a rent of \$1,180, and a three-bedroom had a rent of \$1,450 per month. Median contract rents in Detroit are a direct reflection of what households can afford to pay. The city has a very low median income compared to both Wayne County and the State. Additionally, due to the large blight and vacancy problem, rents tend to remain low particularly in already distressed areas. However, even with relatively cheaper rents, households still have difficulty affording housing. The high levels of vacancy and blight across the city also depress property values and provide essentially no incentive to property owners or developers to introduce a significant amount of new product to the market. Rental units priced toward the bottom of the market are likely in older structures that need repair or may have some of the housing issues that HUD regularly tracks.

The table below presents the Median Gross Rent by Bedroom for Detroit in 2020 and 2023. While this information is not the same as contract rent (gross rent is the contract rent plus the estimated average monthly cost of utilities and heating fuels) what can be observed is that the FMR is still higher than the median gross rents found in Detroit. For two-bedroom units, the 2020 HUD FMR rent is \$1,213 while the median gross rent was \$821. As of 2023, the median gross rent for Detroit was \$1,034. This indicates that rents from a strict pricing standpoint are very low, and the HUD FMR is not actually capturing the market reality because it uses the Metro Area as part of its calculation.

Detroit	Efficiency (no bedroom)	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms
Median Gross Rent 2020	\$654	\$821	\$828	\$993	\$1,070
Median Gross Rent 2023	\$837	\$900	\$1,148	\$1,270	\$1,386
Source: ACS 2016-2020, ACS 2019-2023 , Table B25031					

Preserving naturally occurring affordable housing (NOAH) in Detroit may require a strategy of working with existing owners to improve the conditions of units, particularly those located within older structures

where maintenance has been neglected over time. One of the issues is providing enough incentives to owners to invest capital in housing which may not yield significant cash flow. The city may be required to provide significant subsidies for rehabilitation projects.

Discussion

Detroit's housing market presents affordability challenges, especially for low-income residents. The median home value in 2020 for Detroit remained extremely low at \$52,700, far below the state median of \$162,600 and the national median of over \$400,000. While home values increased by 46% from 2020 to 2023, they are still below state and national averages. The majority of homes are older single-family units, which limits their appeal in the market, particularly for lower-income buyers. On the other hand, the condominium market, especially in areas like Midtown, is experiencing rapid price increases, reflecting the city's push to attract wealthier residents and private investments into more desirable, dense areas. The 2023 median contract rent in Detroit of \$768 per month, was lower than the state median of \$891, but rising demand for affordable rental units, coupled with limited supply, exacerbates cost burdening, with many households struggling to secure safe, affordable housing.

Although Detroit offers many affordable housing units, particularly in terms of rent, the supply does not adequately meet the needs of all income levels. In 2020 as well as in 2021, 38% of Detroit households experienced some form of cost burdening, with the burden greater for low-income renters. While the city does provide some affordable housing options through public housing programs and rental vouchers, long waitlists and limited options often leave low-income households to rely on the private market, where substandard housing is prevalent. Despite these affordability issues, the increase in home values and rents over the last decade signals a shift, with neighborhoods like Midtown seeing rapid price hikes. This could lead to greater displacement risks for vulnerable populations. To tackle these challenges, strategies such as job training, economic development, and targeted subsidies for both renters and homeowners are essential to increase housing affordability and stabilize neighborhoods across Detroit.

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

Introduction

In 2020, about 95% of Detroit’s housing stock was built before 1980 and by 2023 the percentage dropped to 90%. Due to age, many of these homes were likely in need of some level of repair. The city actively monitors and assesses housing conditions to ensure public safety and compliance with rules and regulations. The city is focused on removing blight to make way for revitalization.

Describe the jurisdiction's definition of "standard condition" and "substandard condition but suitable for rehabilitation":

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

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

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

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

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	34,280	27%	71,630	51%
With two selected Conditions	1,400	1%	3,640	3%
With three selected Conditions	175	0%	220	0%
With four selected Conditions	20	0%	25	0%
No selected Conditions	92,860	72%	66,190	47%
Total	128,735	100%	141,705	101%

Table 34 - Condition of Units

Data 2016-2020 ACS

Source:

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	2,815	2%	8,280	6%
1980-1999	3,435	3%	12,675	9%
1950-1979	46,275	36%	54,255	38%
Before 1950	76,220	59%	66,505	47%
Total	128,745	100%	141,715	100%

Table 35 – Year Unit Built

Data 2016-2020 CHAS

Source:

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	122,495	95%	120,760	85%
Housing Units build before 1980 with children present	3,460	3%	720	1%

Table 36 – Risk of Lead-Based Paint

Data 2016-2020 ACS (Total Units) 2016-2020 CHAS (Units with Children present)
Source:

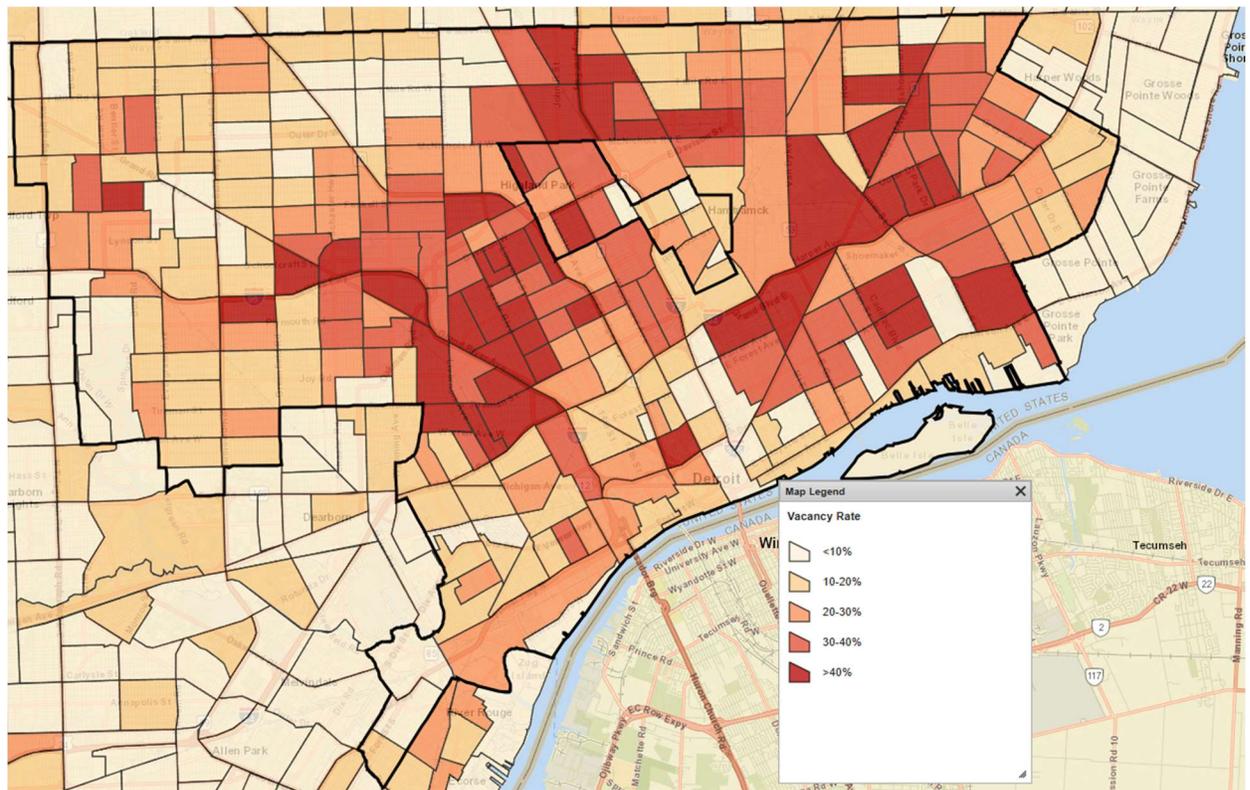
Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units			
Abandoned Vacant Units			
REO Properties			
Abandoned REO Properties			

Table 37 - Vacant Units

Vacancy Rates Local housing conditions are a contributor to housing values and influences market forces, but the City of Detroit is making progress in addressing the issue with the number of vacant units. Figure 9 presents the vacancy rate by census tract based on Census data showing the 2020 5 year ACS data of 87,699 vacant units from 2016-2020. However, the City has dramatically changed since 2016. Based on City analysis, this data is outdated, and the vacancy rate is much lower. The Detroit Land Bank Authority (DLBA) had 29,017 vacant houses in its inventory on February 1, 2016. As on 8/13/2025, the DLBA has only 2,058 vacant houses with 1,555 in the sales process (103 are currently listed for sale) and 503 in the demolition pipeline. By cross referencing address data (including sub-addresses like apartments) with building footprint data, tax assessing records, demolition records, and USPS Delivery Point Validation data, the City staff is able to identify 38,808 vacant residential addresses as of June 2025. 13% of the entire housing stock.

Figure 9. Vacancy Rate



Source: HUD CPD Maps, 2025

Need for Owner and Rental Rehabilitation

Aside from vacant units there are many housing units currently inhabited which have housing problems. The categories of selected conditions defined by HUD are:

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

Of all the housing units found in the city in 2020, about 39%, or 105,910 units had one of the selected conditions. From the Needs Assessment, the predominate condition was cost burdening where households spent greater than 30 percent of their income on housing.

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

From the 2020 data there were 34,280 owner-occupied units and 71,630 renter-occupied units with one housing problem. The Needs Assessment showed most households in the 0 – 30% income bracket were living in conditions which caused them to have either a housing problem or a severe housing problem. The sales price points and monthly rents paid by households across the city may be an indicator that the current housing stock is older and not well-maintained. If housing values are not increasing, it may be more difficult to encourage homeowners and building owners to invest in their properties when they are unlikely to see a return on that investment. Residents with longer-term plans to stay in Detroit may be more likely to make that initial investment as they will have a longer period to pay it back, but residents with shorter time frames or older residents are less likely.

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

In total, about 243,255 housing units (90% of the housing stock in Detroit) were built before 1980 which can be an indicator for risk of Lead-Based Paint (LBP). Lead paint is an environmental hazard which can have particularly harmful effects on children in the home if not taken care of. Based on data provided by HUD there are 4,180 housing units (both renter and owner) which were built before 1980 and have children living in them who may be at risk of exposure. While difficult to determine the exact number of homes containing lead-based paint hazards, a new emphasis on cleanup and/or safe demolition of homes, and stricter landlord laws have spurred improvement in mitigating lead-based paint risks.

Discussion

Detroit's housing landscape, largely built before 1980, is showing its age and often requires significant repairs. The City has made significant progress in addressing vacant housing and continues to diligently monitor housing conditions to ensure safety, compliance, and focuses on eliminating abandoned structures in every neighborhood.

New construction may be rare amongst single family homes, but the City has focused on rehabilitating and renovating existing homes. These efforts are vital for revitalizing neighborhoods and preventing further decline in single family property values. In addition, the City continues to invest in affordable multi-family housing and recently celebrated the investment of over one billion dollars contributing to the creation of 2,653 units and preservation of 3,278 units. Strategic investments in communities can stabilize areas teetering on the edge of increased vacancy. Detroit hopes to ensure all rehabilitated units meet HUD standards and are lead-safe, and free from dangerous conditions, which is essential for fostering a healthier and safer community.

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

Introduction

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

With such a high level of demand, prioritization of housing assistance takes place to target family households with the greatest need. Effective July 1, 2018, the DHC began using local preferences for its public housing program.⁴ Categories of households which receive preference include:

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

The HCV program is a rental housing assistance solution that places housing choice in the hands of the individual or family. DHC pays a portion of the rent directly to a private landlord. Program participants pay the balance of the rent directly to the private landlord. Applicant families are selected from the waitlist and determined eligible. Currently the HCV waitlist is closed.⁵

⁴ http://www.dhcmi.org/uploads/page/DHC_Public_Housing_WL.pdf

⁵ <https://www.dhcmi.org/applicants>

Totals Number of Units

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	264	3,968	5,893	0	5,893	0	724	0
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 38 – Total Number of Units by Program Type

Data PIC (PIH Information Center)

Source:

Describe the supply of public housing developments:

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

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

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

There are 42 public housing developments in the DHC site listing. These developments have an average Real Estate Assessment Center (REAC) score of 80. The Public Housing Condition table below includes the

name of the development and the HUD REAC data (inspection scores). There are six developments which have a score of less than 60 which brings the overall average down.

Development Name	Inspection Score
Woodbridge IV	99
Woodbridge III	98
Gardenview Estates Phase III D	96
UNNAMED	95
Woodbridge - Senior Enhanced	95
Gardenview Estates II B	94
Cornerstone Phase VIIC	93
Gardenview Estates IIA	93
Riverbend Towers	92
Gardenview Estates Phase III C	92
SHERIDAN PLACE I	92
Gardenview Phase IV	92
JEFFRIES HOMES	91
Gardenview Estates III A	91
Gardenview Estates II C	91
Gardenview Estates	91
Emerald Springs 1A	90
WARREN WEST	90
Gardenview Estates III B	89
Greenbrook	89
Woodbridge Estates I	87
Woodbridge Estates II	87
Woodbridge V	87
Emerald Springs Phase II	85
Algonquin	85
SOJOURNER TRUTH	84
Cornerstone Estates 7A	84
Woodbridge Estates Phase X	82
PARKSIDE VILLAGE IV Rehab	79
Cornerstone Estates 7B	79
Gardenview Estates Rental Phase V	76
SMITH HOMES	71
SCATTERED SITES	70
BREWSTER-DOUGLAS	70
Emerald Springs 1B	63

Development Name	Inspection Score
STATE FAIR APTS	60
HARRIET TUBMAN	55
SCATTERED SITES	51
SCATTERED SITES	47
DIGGS HOMES	46
Alexandrine Square Apartments	37
PARKSIDE VILLAGE II Rehab	37
Source: HUD, 2025	

Public Housing Condition

Public Housing Development	Average Inspection Score
	80

Table 39 - Public Housing Condition

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

The DHC created a comprehensive Capital Improvement Plan which addresses the needs of properties based on the guidance received from the Physical Needs Assessment. The Plan was created and is executed in accordance with HUD guidance and regulations. DHC has effectively expanded and administered the Capital Fund Program (CFP) to improve and preserve DHC properties. This resulted in substantial improvements of Public Housing Authority (PHAS) indicators and Real Estate Assessment Center (REAC) property inspections scores. DHC will continue to develop and implement the Capital Improvement Plan to improve the quality of life for DHC’s residents. The DHC has used the projected CFP award amount of \$39,586,102.00 for 2023-2027 budget projections. Key highlights of the Capital Improvement Plan include:

- Diggs Homes - \$6,025,275 for exterior upgrades, unit renovations, roof replacements, and furnace and water heater improvements.
- Smith Homes - \$5,550,081 for unit renovations, kitchen and bathroom renovations, window replacements, and site improvements.
- Sheridan Place 1 - \$3,436,851 for unit renovations and flooring.
- Warren West - \$3,082,234 for unit renovations, flooring, elevator upgrades, and kitchen and bathroom renovations.

The DHC Real Estate Development Department is working to create a long-term self-development plan that is focused on acquisition of single-family, multifamily structures and vacant land throughout the Detroit area, completing the revitalization of Gardenvue Estates, re-developing the obsolete Villages at Parkside, and developing vacant land at Smith Homes as funding is made available. The DHC is devising a portfolio-wide repositioning plan evaluating the possibility of initiating RAD contracts for developments within the DHC portfolio as well as the privately owned Mixed Finance Projects.

The completion of a self-development plan will allow DHC to partner with private/public entities and compete for financial assistance including but not limited to LIHTC, grants, traditional equity, New Market Tax Credits, private foundation grants and conventional financing. DHC will also put into place a strategic

land acquisition plan to help preserve affordable housing within the City of Detroit. DHC's development staff is currently researching various funding sources to determine DHC's eligibility and possible new development endeavors.

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

The DHC is dedicated to enhancing the living environment for low- and moderate-income families residing in public housing through a comprehensive strategy that includes development, rehabilitation, and community partnerships. One of the key initiatives is the revitalization of Gardenvue Estates, where DHC has sold land to KIPP Whole Child Center for the development of a public charter school, health center, early childhood learning center, and Boys and Girls Club. This project aims to create a well-rounded community with up to 200 low-income and affordable housing units, ensuring residents have access to essential services and educational opportunities within walking distance.

Another significant project is the redevelopment of the Villages at Parkside. DHC has partnered with Ginosko Development Company to transform the site into a mixed-income community serving seniors, families, and people with disabilities. The redevelopment includes building new housing units, relocating residents from obsolete units, and addressing structural issues such as sewer, flooding, and roofing problems. This initiative aims to improve housing quality and availability, providing a safer and more comfortable living environment for residents. Additionally, DHC is converting to RAD Section 8 Project-Based Vouchers (PBV) to access private capital for repairing and preserving affordable housing assets.

DHC is also focused on the acquisition and rehabilitation of small buildings through the Section 18 proceeds, aiming to infuse more low-income and affordable living spaces into the community. Projects like the acquisition and renovation of 2900 Tyler, a small Spanish Revival-style apartment building, contribute to the preservation of affordable housing in Detroit. Furthermore, DHC plans to dispose of scattered sites, including vacant lots and single-family homes, to redirect resources towards developing quality new units for low-income families. These efforts, combined with ongoing upgrades to boiler systems, elevators, and exterior improvements across multiple sites, demonstrate DHC's commitment to improving the living conditions and overall quality of life for public housing residents.

In addition to physical improvements, DHC promotes self-sufficiency and asset development through workforce development programs. The Resident Services Department has established job centers and launched initiatives like the Jobs Plus grant to support underemployed households. By providing case management, job development, and homeownership programs, DHC helps residents increase their earned income and achieve economic independence. This holistic approach ensures that low- and moderate-income families not only have access to safe and affordable housing but also the resources and opportunities needed to thrive in their communities.

Discussion:

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

Additionally, DHC is committed to preserving affordable housing through the acquisition and rehabilitation of small buildings and the strategic disposal of scattered sites. Efforts to upgrade infrastructure, such as boiler systems and elevators, further support this goal. DHC also promotes self-

sufficiency and economic independence through workforce development programs, helping residents increase their earned income and achieve greater stability.

DRAFT

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

Introduction

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

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

- **Emergency Shelter** - Any facility, the primary purpose of which is to provide temporary shelter for the homeless in general or for specific populations of the homeless, and which does not require occupants to sign leases or occupancy agreements.
- **Transitional Housing** - A project that is designed to provide housing and appropriate supportive services to homeless persons to facilitate movement to independent living within 24 months, or a longer period as approved by HUD.
- **Rapid Rehousing (RRH)**- RRH is permanent housing that provides short-term (up to three months) and medium-term (4-24 months) tenant-based [rental assistance](#) and supportive services to households experiencing homelessness.
- **Permanent Supportive Housing** - Permanent housing in which supportive services are provided to assist homeless persons with a disability to live independently.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Housing Beds	Supportive Housing Beds
	Year-Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	436	0	389	1,194	0
Households with Only Adults	4	0	2	0	0
Chronically Homeless Households	0	0	0	2,238	0
Veterans	27	10	217	737	0
Unaccompanied Youth	48	0	151	46	0

Table 40 - Facilities and Housing Targeted to Homeless Households

Facilities and Housing Targeted to Homeless Households

Category	Population	Single Beds	Family Beds	Seasonal/ Overflow Beds
Emergency Shelter	Households with Adult(s) and Child(ren)	0	436	65
	Households with Only Adults	505	0	35
	Chronically Homeless Households*	0	0	0
	Veterans	27	0	5
	Unaccompanied Youth (18-24)	45	0	0
	Persons in Households with Only Children (minors under 18)	3	0	0
	Total Emergency Shelter Beds	580	436	105
Transitional Housing	Households with Adult(s) and Child(ren)	0	57	0
	Households with Only Adults	0	0	0
	Chronically Homeless Households*	0	0	0
	Veterans	70	0	0
	Unaccompanied Youth (18-24)	85		0
	Persons in Households with Only Children (minors under 18)	0	0	0
	Total Transitional Housing Beds	155	57	0
Rapid Rehousing	Households with Adult(s) and Child(ren)	--	332	0
	Households with Only Adults	229	--	0
	Total Rapid Rehousing Beds	229	332	0
Permanent Supportive Housing	Households with Adult(s) and Child(ren)	0	964	0
	Households with Only Adults	1,380	0	0
	Chronically Homeless Households*	1,431	807	170
	Veterans	725	0	0
	Unaccompanied Youth (18-24)	46	0	0
	Persons in Households with Only Children (minors under 18)	0	0	0
	Total Permanent Supportive Housing Beds	2,151**	964**	170

Table 40 - Facilities and Housing Targeted to Homeless Households

*Category not mutually exclusive

**Total doesn't include "Chronically Homeless Households" category

Source: [2024 Detroit CoC Housing Inventory Count Summary Data Report](#)

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

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

- Substance abuse treatment
- Case management including connection to benefits such as Medicaid and Social Security.
- Childcare
- Education & employment training
- HIV/AIDS-related services
- Life skills
- Mental health treatment
- Transportation assistance
- Health care
- Document restoration, such as birth certificates and state identification cards
-

Service provision varies from provider to provider, and eligibility for these services is generally linked to the source providing the funding for the service. Persons experiencing homelessness are connected to mainstream services via referrals from the program they are currently enrolled in (e.g.: emergency shelter) or through our local call center provided by the Detroit Wayne Integrated Health Network (DWIHN).

The Detroit Health Department also provides services to homeless persons, especially those suffering from HIV/AIDS. The Housing Opportunities for Persons with AIDS (HOPWA) program provides housing assistance and related support services for low-income persons living with HIV/AIDS and their families. This program helps to address discrimination, stigma, and other barriers to achieving stable living situations. HOPWA Detroit has one program which helps these households, the Housing Assistance Payment Initiative (HAPI) program provides tenant based rental assistance, paying a portion of a household's rent with the remaining being paid by the household.

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

See table below.

Service Provider	Description	Population Served			
		Chronically Homeless Individuals & Families	Families with Children	Veterans and their Families	Unaccompanied Youth
Cass Community Social Services, Inc.	Cass provides emergency shelter for families with minors and single women as well as permanent supportive housing for single adults. Provides meal program and services for adults with developmental disabilities.	X	X	X	X
Rescue Mission Genesis II	Serving 48 women and 14 children. Women in this program often are working on substance abuse aftercare issues, addressing legal issues, and attend school and training programs to give them a future.		X		
Detroit Rescue Mission Ministries (Oasis)	Social service agency that provides a wide range of social services include drug rehabilitation, recovery housing, meal programs, multiple emergency shelter programs, and permanent supportive housing for households experiencing literal and chronic homelessness. Shelter programs include: 3rd Street Shelter- single men Oasis Shelter- single men Genesis II Family Shelter- families and single women Gratiot Family Shelter- families and single women.	X		X	
Matrix Off the Streets - For Homeless Teens	Provides shelter and other services to homeless youth, or vulnerable teens. Provides				X

	voluntary crisis intervention and supports families and youth.				
Coffer Adult Foster Care Home	Adult Foster care home.	X			
Derrick's Adult Foster Care	Adult Foster care home.	X			
Covenant House Michigan	Emergency Shelter and transitional housing programs for youth aged 18-24.				X
DRMM Detroit Rescue Mission	Emergency Shelter Men Only. All Male Emergency Shelter & Transitional Housing.	X		X	
NSO Tumaini Center	The Tumaini Center is a crisis support center for chronically homeless individuals. Established in 1975 and provides services to all who enter their doors including substance abuse treatment, mental health assessment and referral, case management, emergency food, and clothing storage.	X			
Detroit Rescue Mission	Emergency shelter. Founded in 1909, The Detroit Rescue Mission Ministries has embarked upon its 100th year of continued service providing food, shelter, and services to intervene upon homelessness and substance addiction throughout Detroit and its surrounding metropolitan communities.	X			
Coalition on Temporary Shelter (COTS)	Provides emergency shelter for families with children as well as permanent supportive housing for households experiencing literal and chronic homelessness.	X			
Mighty Voices of Hope Inc.	Mighty Voices of Hope is an organization that brings awareness of the homeless situation in the metro Detroit area. They currently feed and house local homeless men who used to live in vacant homes or on the street.	X			

Mariners Inn	The Transitional Housing (TH) Program is a supportive, semi-independent living experience available to men who have successfully completed the Mariners Inn Residential Treatment Program. The Transitional Housing Program offers living space and meals in a recovering community of sober	X			
Open Door Rescue Mission Ministries	Assistance for: homeless; addicted; mentally or emotionally challenged.	X			
Bethlehem House	Shelter for homeless workingwomen without children. Ages from 35-65. Must be employed and homeless. Counseling, money management and bible study. Drug and alcohol rehabilitation not available.	X			
The Philip House Mission	Emergency shelter, transitional housing, independent / supportive housing, men and women facilities, job assistance, domestic training, substance abuse prevention, case management, application/intake process, and counseling.	X	X		
Operation Get Down	Transitional Housing - Family		X		
New Path Homeless Shelter	Private rooms, shared rooms, fully furnished, kitchen, bath, and laundry.	X			
Skyline Outreach	Transition is an emergency transitional housing facility that allow homeless (domestic) women and their child to have a safe environment that can move a place of self-efficiency through varies programs.		X		
Transition 1.2.3. Inc.	Links people to homes for veterans, seniors, displaced seniors, HIV victims, and others.	X		X	

Refuge International Inc.	Emergency Shelter Transitional Housing - Family		X		
Eastside Emergency Center	Shelter for homeless youth between the ages of 8 and 24.				X
Genesis One Transitional Youth Center	Clean, Safe, Low-Cost Supportive Housing Residency with Great Oaks is meant to bridge the gap from homelessness to permanent housing. They assist individuals in becoming economically self-sufficient and stable by providing low barrier, emergency housing with a variety of support services.				X
Alternatives for Girls	Provides services to minor and unaccompanied female youth who are at imminent risk or experiencing homelessness. Services include providing emergency shelter, transitional housing, rapid rehousing, and permanent supportive housing for households experiencing literal and chronic homelessness.	X	X		X
Community Social Services Wayne County	To develop partnerships with like-minded organizations, inspiring action that results in rebuilding broken lives and restoring dignity.	X			
Covenant House	Covenant House Michigan (CHM) provides shelter and hope to young people ages 18-24 who are experiencing or at risk of homelessness.				X
Detroit Central City Community Mental Health	The Supportive Housing Division is comprised of numerous programs servicing individuals with varying needs and/or circumstances including, military veterans, domestic abuse survivors, people with severe mental illness and co-occurring disorders (severe mental illness and substance abuse) and people with	X	X	X	X

	physical or health disabilities who may also have a substance abuse problem.				
Detroit Central City Health	The agency operates a Federally Qualified Health Center as well as rapid rehousing and permanent supportive housing for households experiencing literal and chronic homelessness as well as other social service programs.	X	X	X	X
Detroit Rescue Mission Ministries	Social service agency that provides a wide range of social services include drug rehabilitation, recovery housing, meal programs, multiple emergency shelter programs, and permanent supportive housing for households experiencing literal and chronic homelessness. Shelter programs include: 3rd Street Shelter- single men Oasis Shelter- single men Genesis II Family Shelter- families and single women Gratiot Family Shelter- families and single women	X	X	X	X
Emmanuel House	Emmanuel House per Diem Transitional Housing program is designed to provide quality, affordable housing programs and services to homeless veterans in the Metro Detroit area.			X	
Freedom House	Freedom House Detroit provides emergency shelter and transitional housing for households seeking asylum and survivors of torture.	X			X

<p>Michigan Veterans Foundation</p>	<p>The Detroit Veterans Center provides emergency shelter and grant per diem program, a type of transitional housing program for male veterans. The DVC provides the skills and confidence needed for homeless veterans to break the cycle of homelessness and return to independent living.</p>			<p>X</p>	
<p>Neighborhood Legal Services of Michigan (NLSM)</p>	<p>NLSM provides financial assistance, housing relocation and stabilization services in rapid rehousing and permanent supportive housing programs for households who are literally homeless. They also operate a new HUD program component, Joint RRH-TH program which serves households who are survivors of domestic violence.</p>	<p>X</p>	<p>X</p>		<p>X</p>
<p>Neighborhood Service Organization (NSO)</p>	<p>Provides emergency shelter for single women as well as outreach for unsheltered households. NSO's empowering programs and services help older adults with mental illness; children, youth, and adults with developmental disabilities; homeless recovery services; housing development; community outreach for psychiatric emergencies; and volunteer opportunities for individuals, groups, and organizations.</p>	<p>X</p>	<p>X</p>		<p>X</p>
<p>New Day Multi-Purpose Center</p>	<p>Shelter and warming center during cold-weather extremes.</p>	<p>X</p>			
<p>Positive Images</p>	<p>Provides a women specialty program, intensive substance abuse treatment, domicile, integrated services (substance abuse and mental health treatment combined), childcare, shelter, support services, referrals to ancillary services, and</p>	<p>X</p>	<p>X</p>		

	collaborates with existing community programs.				
Ruth Ellis Center	Social services agency that serves the needs of the homeless including but not exclusively runaway, homeless, and at-risk lesbian, gay, bisexual, and transgender (LGBT) youth. Also provide permanent supportive housing for households experiencing literal and chronic homelessness.		X		X
MiSide (formerly called Southwest Counseling Solutions)	Provide a broad range of programs in the areas of human development, economic development, housing, and community engagement. Operates both rapid rehousing and permanent supportive housing programs for households experiencing literal and chronic homelessness.	X	X	X	
St. John's Community Center	Emergency shelter and warming center during cold-weather extremes for single males.	X		X	
The Salvation Army	Provides emergency shelter for single women and families with children.	X			
Travelers Aid Society of Metro Detroit	Traveler's Aid of Metropolitan Detroit provides leading human services that sustain, attract, and inspire confidence and excellence in their clients, employees, and community partners. They provide permanent supportive housing for households experiencing literal and chronic homelessness as well as other social service programs.	X	X		X
Volunteer of America (VOA)	VOA provides a comprehensive range of services for Veterans and their families including food security and employment resources. Through prevention, rapid			X	X

	rehousing, interim housing, transitional housing, permanent supportive housing, job training and compensated work programs, they make it possible for veterans to have a roof over their heads and the professional opportunities they deserve.				
YWCA	YWCA provides services, including emergency shelter for single women and families who are fleeing domestic violence.		X		
Community & Home Supports, Inc.	Provides coordinated entry, street outreach, rapid rehousing, and permanent supportive housing for households experiencing literal and chronic homelessness.	X	X		X
Central United Methodist Church – The Noah Project	Provides a day center program for low income and the unhoused population which includes a lunch program as well as street outreach for the unsheltered population.	X		X	X

<p>United Community Housing Coalition</p>	<p>Provides legal services and prevention services for households at imminent risk of homelessness.</p>		<p>X</p>		
<p>Matrix Human Services</p>	<p>Provides a wide range of community services including prevention services for households at imminent risk of homelessness.</p>		<p>X</p>		
<p>Wayne Metro Community Action Agency</p>	<p>Community Action Agency for Wayne County-provides a wide range of services related to water and energy, financial services, home repair, educational programs, and a variety of other services. WMCAA also provides services for those at imminent risk of homelessness through prevention programming and operates the Detroit Housing Resources HelpLine which provides a one stop shop for residents who are in a housing crisis. For those experiencing literal homelessness, WMCAA provides street outreach as well as rapid rehousing and permanent supportive housing programs.</p>	<p>X</p>	<p>X</p>	<p>X</p>	<p>X</p>

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

Introduction

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

HOPWA Assistance Baseline Table

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

Table 41– HOPWA Assistance Baseline

Data HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

Source:

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

Persons with HIV/AIDS and their families

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

- Increasing the availability of decent, safe, and affordable housing for low-income people living with HIV/AIDS
- Creating and supporting affordable housing for people living with HIV/AIDS by linking HOPWA with resources through community planning efforts
- Creating partnerships among states and local government and community-based organizations and other non-profit organizations to meet the housing and supportive service needs of persons living with HIV/AIDS.

Because clients are living longer with HIV/AIDS the housing approach must match this outcome. Housing delivery must go from immediate housing to prevent homelessness to stabilizing clients with permanent housing solutions.

Supportive housing needs may include:

- Moving costs
- Emergency housing

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

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

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

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

HIV/AIDS

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

Seniors

While the city's Senior Citizens Department has closed, HRD still provides some help for seniors. Every year HRD funds organizations through its CDBG allocation process to help seniors with their health and transportation needs. Senior citizens can apply for funding to fix their homes through the Home Repair program, and also the 0% Interest Home Loan Program. Subsidized housing as well as Section 8 Vouchers for rental housing are available for income qualified seniors. The city also facilitates the development and invests in senior affordable housing.

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

HIV/AIDS

Under the rental assistance component of the HOPWA program, Detroit currently utilizes 190 rental subsidies. Additionally, there are 40 units of transitional, short-term housing available for individuals with HIV/AIDS. The total grant allocation for HOPWA-related activities in 2024 is \$3,593,290.⁶

Seniors

⁶ <https://www.hudexchange.info/grantees/detroit-mi/>

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

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

- Meals on Wheels
- Caregiving assistance
- Housing resources
- Transportation resources
- Support groups for family caregivers
- Utility payment assistance resources
- Services for seniors and people living with disabilities
- Help seniors experiencing elder abuse or neglect

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

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Public policies can act either as barriers to affordable housing or can serve to promote it. Recognizing this and remaining cognizant of the negative effect public policies can have on housing affordability, the City of Detroit does not impose limitations such as growth controls, impact fees, exclusionary or large lot zoning requirements, or rent controls; all of which can present barriers to affordable housing. The city Planning Commission has recently undertaken a significant update to the city zoning ordinance, known as Zone Detroit, to seek ways to ensure zoning laws are flexible, inclusionary, and considerate of changing times and communities.⁷

With the combined effects of a significant population loss in recent decades, the recent housing crisis, and a number of vacant and dilapidated properties; decent, safe, and affordable housing options decreased for many Detroit residents. Because homeownership remains out of reach for a sizeable portion of the population, the demand for affordable rental housing within the city is great. At the same time, the amount of affordable rental housing is limited. Public housing, the source of Detroit's largest number of affordable rental units, only provides an estimated 9,900 units, including voucher units. Currently, the waiting list is closed due to excessive demand, so the need for affordable units is critical. To address the need for housing, in 2017 the city adopted an affordable housing ordinance requiring residential developers receiving certain subsidies or donated land from the city to offer at least 20 percent of their rental units as income-restrictive affordable housing.

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

- Lack of financial resources to build affordable housing (i.e., lending institutions willing to invest in Detroit)
- Higher housing tax rates
- Higher insurance rates compared to nearby suburban areas
- Adverse neighborhood conditions including crime/perceived crime and lack of amenities.
- Decreased funding in CDBG/HOME and other federal funding sources
- Aging housing stock in Detroit requiring higher maintenance costs

⁷ <https://zonedetroit.com/>

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

Introduction

The tables in this section provide a baseline set of data on Detroit's workforce, economy, and human capital. One of the issues that arose from the analysis was that Detroit has many young working age residents who are unemployed and may be under-skilled for jobs in the city. The unemployment rate for 16-24-year-olds was 37% in 2020, which is troubling as this considers individuals who are active in the workforce and not in school. One of the identified problems was that nearly 20% of young workers did not finish high school and do not have a high school diploma or GED. Given the changing nature of employment in the city and across the United States, many young people are at risk of being left behind economically unless educational attainment levels improve and/or skills trainings are available to better prepare workers for jobs of the future.

Low levels of educational attainment translate directly into lower earning potential. Based on the 2020 data provided by HUD, Detroit high school graduates earned only 58% of what bachelor's degree holders earned, while those with some college or associate degrees earned about 67% of bachelor's degree holders. The changes to Detroit's existing industries such as automotive and manufacturing require workers to have higher levels of education, technical skills, and the ability to adapt to technological change. Investment in human capital is necessary to ensure everyone in Detroit has an opportunity to be gainfully employed.

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

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	204	168	0	0	0
Arts, Entertainment, Accommodations	28,138	28,148	15	14	-1
Construction	3,710	6,381	2	3	1
Education and Health Care Services	42,759	63,185	22	31	8
Finance, Insurance, and Real Estate	8,751	6,861	5	3	-1
Information	2,636	3,599	1	2	0
Manufacturing	23,935	24,599	12	12	-1
Other Services	6,507	8,121	3	4	1
Professional, Scientific, Management Services	15,885	26,150	8	13	4
Public Administration	0	0	0	0	0
Retail Trade	18,812	12,878	10	6	-4
Transportation and Warehousing	7,778	4,894	4	2	-2
Wholesale Trade	5,227	6,602	3	3	0
Total	164,342	191,586	--	--	--

Table 42 - Business Activity

Data 2016-2020 ACS (Workers), 2020 Longitudinal Employer-Household Dynamics (Jobs)

Source:

Labor Force

Total Population in the Civilian Labor Force	286,675
Civilian Employed Population 16 years and over	243,925
Unemployment Rate	14.91
Unemployment Rate for Ages 16-24	36.88
Unemployment Rate for Ages 25-65	8.31

Table 43 - Labor Force

Data 2016-2020 ACS

Source:

Occupations by Sector	Number of People Median Income
Management, business and financial	38,075
Farming, fisheries, and forestry occupations	6,800
Service	37,700
Sales and office	50,135
Construction, extraction, maintenance, and repair	13,970
Production, transportation, and material moving	21,340

Table 44 – Occupations by Sector

Data 2016-2020 ACS

Source:

The unemployment rate in Detroit was 15% in 2020 and dropped to 14% in 2023. Figure 10 presents the unemployment data across the city’s census tracts. What can be observed is that large sections of the city had unemployment rates higher than 20%. High levels of unemployment correlate to a lack of local employment opportunities, skills mismatches, and a lack of education on the part of workers. High unemployment rates result in diminished purchasing power, and greater strain on the city’s social services.

Figure 10. Percent of Unemployed Population



Source: HUD CPD Maps, 2025

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	144,777	64%
30-59 Minutes	65,010	29%
60 or More Minutes	14,793	7%
Total	224,580	100%

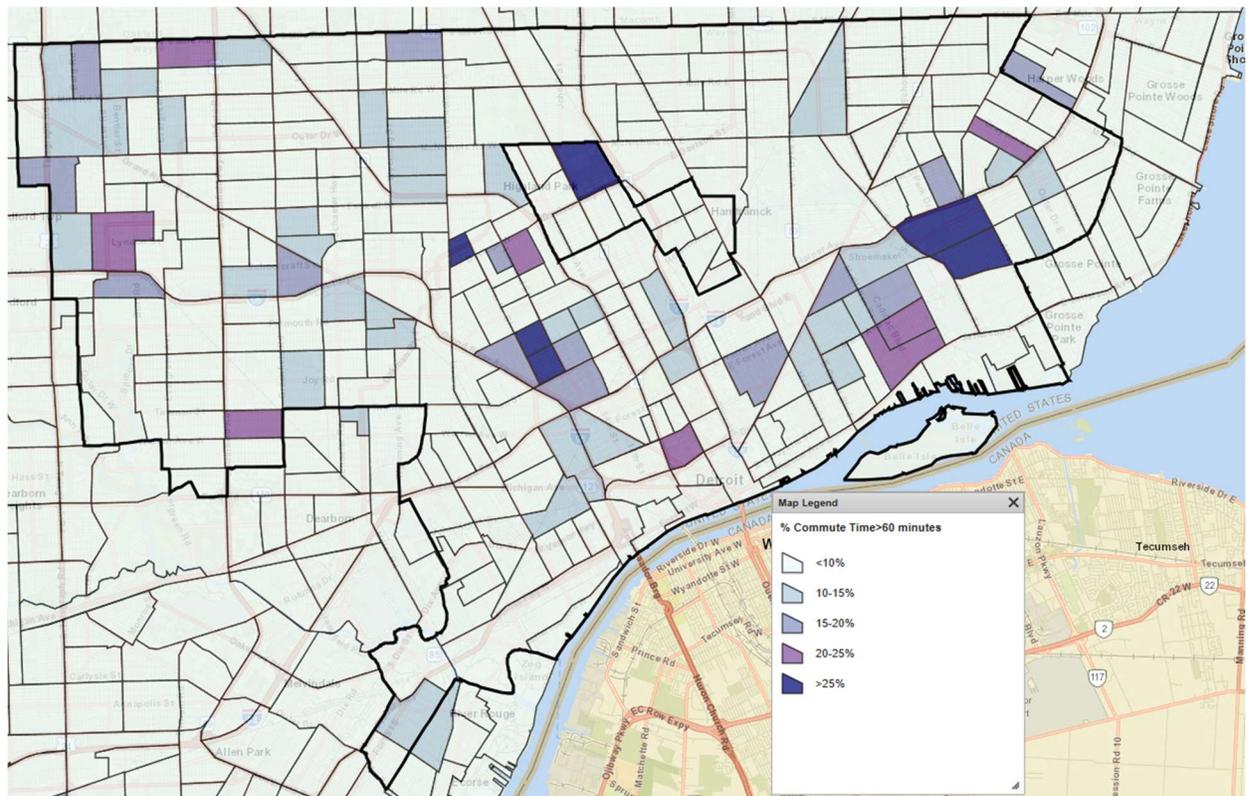
Table 45 - Travel Time

Data 2016-2020 ACS

Source:

In 2020, about 64% of workers had commutes of less than 30 minutes. This finding makes sense because many of Detroit's surrounding communities are large employment centers. Communities such as Dearborn and Livonia have large manufacturing firms which have an employment catchment area covering Detroit. Figure 11 below presents commute data by census tract for Detroit. What can be observed is that people living outside the urban core of the city tend to have longer commute times. This potentially shows the mismatch in skills between workers and jobs found locally.

Figure 11. Percent Commute Time Less Than 60 Minutes



Source: HUD CPD Maps, 2025

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	20,205	5,550	33,200
High school graduate (includes equivalency)	58,250	10,285	42,880
Some college or associate's degree	76,245	9,905	31,540
Bachelor's degree or higher	43,130	2,835	9,750

Table 46 - Educational Attainment by Employment Status

Data 2016-2020 ACS

Source:

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	1,245	2,845	4,740	9,205	7,320
9th to 12th grade, no diploma	12,135	11,225	9,830	21,105	12,975
High school graduate, GED, or alternative	25,630	33,245	25,885	52,315	29,550
Some college, no degree	22,720	30,255	19,915	41,565	20,925
Associate's degree	1,550	6,995	6,480	12,500	7,135
Bachelor's degree	4,220	13,565	7,780	13,850	8,030
Graduate or professional degree	445	6,035	4,425	10,080	7,785

Table 47 - Educational Attainment by Age

Data 2016-2020 ACS

Source:

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	21,157

Educational Attainment	Median Earnings in the Past 12 Months
High school graduate (includes equivalency)	25,532
Some college or associate's degree	29,784
Bachelor's degree	44,148
Graduate or professional degree	54,966

Table 48 – Median Earnings in the Past 12 Months

Data 2016-2020 ACS

Source:

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

Based on data from 2020, the major employment sectors of Detroit's economy were Educational and Health Care Services (26%); Arts, Entertainment, and Accommodation (17%); Manufacturing (15%); Professional, Scientific, Management Services (10%); and Retail Trade (11%). These five sectors employed about 79 percent of all the workers. Based on data from 2023 only minor changes have occurred with regard to the city's employment composition. The following list show the main industries in 2023:

- Educational and Health Care Services (22%)
- Arts, Entertainment, and Accommodation (11%)
- Manufacturing (19%)
- Professional, Scientific, Management Services (11%)
- Retail Trade (9%)

Major employers by sector include:

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

In 2020, Detroit residents tended to live near their work with 64% of workers traveling less than 30 minutes to their place of work. Based on data from the U.S. Census, only 29% of Detroit residents lived and worked in the city. This shows that the city imports workers from surrounding communities and that

these workers have the skills and training to be competitive in Detroit's labor market. A challenge is to develop the skills of Detroit residents so that they can work locally within the city.

Describe the workforce and infrastructure needs of the business community:

Detroit's business community seeks an educated, well-trained, technically skilled, and professional workforce which can help the city compete for companies and jobs in the Educational and Health Care Services, Manufacturing, and Professional, Scientific, and Management Services sectors. Worker training is critical for younger residents, as the city had an unemployment rate of 37% for 16-24-year-olds in 2020. Specific workforce needs include:

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

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

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

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

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

- Hudson's Site Development
 - This mixed-use development includes a 49-story skyscraper with luxury condos, a hotel, retail spaces, and a 12-story office building. The project aims to introduce over 1.5 million

square feet of new retail, office, dining, hospitality, residential, and event amenities to downtown Detroit.⁸

- Henry Ford Future of Health
 - A \$3 billion megaproject in New Center, including a Henry Ford hospital expansion, housing and retail from the Pistons, and research space for Michigan State. This development is expected to run through 2029 and aims to create a vibrant, walkable community with state-of-the-art healthcare and research facilities.⁹
- University of Michigan Center for Innovation (UMCI)
 - A \$250 million investment in the Ilitch's District Detroit area, designed to foster research, education, and entrepreneurship. The six-story building will house public-facing programs and multidisciplinary graduate research, with completion expected by spring 2027.¹⁰
- Gordie Howe International Bridge
 - This 1.6-mile cable-stayed bridge will connect Detroit with Windsor, Ontario, facilitating international trade and travel. The bridge will feature six lanes, bike, and pedestrian paths, and is expected to be completed by 2025.¹¹
- Motown Museum Expansion
 - A \$50 million project to create a 50,000 square foot complex with interactive exhibits, a new theater, recording studios, and expanded meeting and retail space. The expansion aims to enhance the cultural and historical significance of the Motown Museum.¹²
- Michigan Central Station
 - Ford Motor Company's \$740 million campus for mobility in Corktown, including office, retail, and residential spaces. The project is expected to bring 5,000 workers to Detroit and stimulate economic growth.¹³
- Fiat Chrysler Plant Investments
 - Fiat Chrysler Automobiles is investing \$2.5 billion to convert its Mack Avenue Engine Complex and retool the Jefferson North Assembly Plant, creating 5,000 new jobs in Detroit.¹⁴
- Detroit Center for Innovation
 - The University of Michigan's \$300 million campus focusing on high-tech research and education. The center aims to drive innovation and economic development in Detroit.¹⁵

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

- Investment in public education

⁸ <https://developmenttracker.detourdetroiter.com/projects/hudsons-site>

⁹ <https://www.henryford.com/future-of-health>

¹⁰ <https://detroit.umich.edu/umci/>

¹¹ <https://gordiehoweinternationalbridge.com/>

¹² <https://www.motownmuseum.org/expansion-opening-date-and-new-interior-renderings/>

¹³ <https://michigancentral.com/visit/>

¹⁴ <https://www.wxyz.com/fiat-chrysler-to-build-new-plant-in-detroit-invest-4-5-billion-in-existing-michigan-plants>

¹⁵ <https://detroit.umich.edu/umci/>

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

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

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

The importance of education cannot be understated, as workers with low levels of education will continue to be left behind by Detroit's increasingly competitive and changing job market. One such group are individuals without a high school diploma and is reflected in their ability to earn an income. The median earnings for this group are \$21,157 per year in 2020. Comparatively, as educational levels increase incomes tend to rise. Based on data from 2020 provided by HUD, Detroit high school graduates earned only 58% of what bachelor's degree holders earned, while those with some college or associate degrees earned about 67% of bachelor's degree holders. Of the employed civilian population in 2020, only 15% had bachelor's degrees or greater. This shows that secondary education, which tends to be a minimum qualification for many corporate roles, is lacking. Of the civilian employed population in 2020, 18% had less than a high school degree or less. Without further training, the population will lack critical skills necessary to earn higher incomes in a changing economic environment, especially as greater levels of automation take place.

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

A free job training initiative launched in 2018 aims to help tens of thousands of local residents, particularly younger individuals, reenter the workforce within five years. The program focuses on high-demand sectors such as healthcare, information technology, manufacturing, construction and transportation, and retail, hospitality, and entertainment. It offers a range of services including job placement, career coaching, and skills training, serving thousands of job seekers and businesses annually. Local colleges and universities also play a key role in providing ongoing education and workforce development opportunities, while numerous nonprofit organizations offer specialized training programs.

Several community-based workforce development programs are designed to help individuals overcome barriers to employment and achieve long-term economic stability. These include adult literacy services to improve reading, math, and computer skills; financial coaching and benefits access through family support centers; and comprehensive job training models that combine education with hands-on experience. Programs also target specific populations, such as at-risk youth ages 18–24, offering pre-apprenticeship training and educational support. Many of these services are free for eligible participants and are tailored to meet the needs of underserved communities.

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

Yes.

The Comprehensive Economic Development Strategy (CEDS) is a regionally driven, strategy-based plan designed to guide economic growth and resilience. It serves as a foundational tool for communities to engage stakeholders, align public and private resources, and build capacity for long-term prosperity. CEDS integrates various regional planning efforts and is required for regions seeking designation as Economic Development Districts (EDDs) or eligibility for certain federal funding. The process emphasizes collaboration, strategic visioning, and measurable outcomes to support inclusive and sustainable economic development.

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

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

Discussion

Over the past 40 years, Detroit has faced significant economic challenges due to globalization and the decline of manufacturing, particularly in the automotive industry. This has led to high unemployment rates and population migration. However, the city is working towards revitalizing its economy by attracting new businesses, investments, and talent, aiming to build a knowledge and service-based economy. Workforce challenges include a high unemployment rate among young residents and low educational attainment levels, which limit earning potential and job opportunities. To address these issues, Detroit needs to invest in education and skills training to prepare its residents for future jobs.

Detroit's business community requires a well-educated and technically skilled workforce to compete in key sectors such as Educational and Health Care Services, Manufacturing, and Professional, Scientific, and Management Services. Workforce needs include training in technology, advanced manufacturing, skilled trades, computer science, finance, advanced medical/healthcare skills, and customer service. Infrastructure improvements are also crucial for connecting residents to employment centers, including enhancing public transportation services and creating affordable housing close to employment nodes.

Several major economic development projects are underway in Detroit, including the Gordie Howe International Bridge, Motown Museum expansion, Michigan Central Station, and Fiat Chrysler Plant investments. These projects are expected to create job opportunities and stimulate economic growth.

Neighborhood plans in the East and Central Design Regions focus on housing rehabilitation, development of community assets, and economic development. These plans, in coordination with the Consolidated Plan, aim to stabilize and revitalize neighborhoods, support population growth, and create job opportunities, helping Detroit pivot towards a brighter future.

MA-50 Needs and Market Analysis Discussion

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

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

Concentration - a close gathering or clustering of people or things.

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

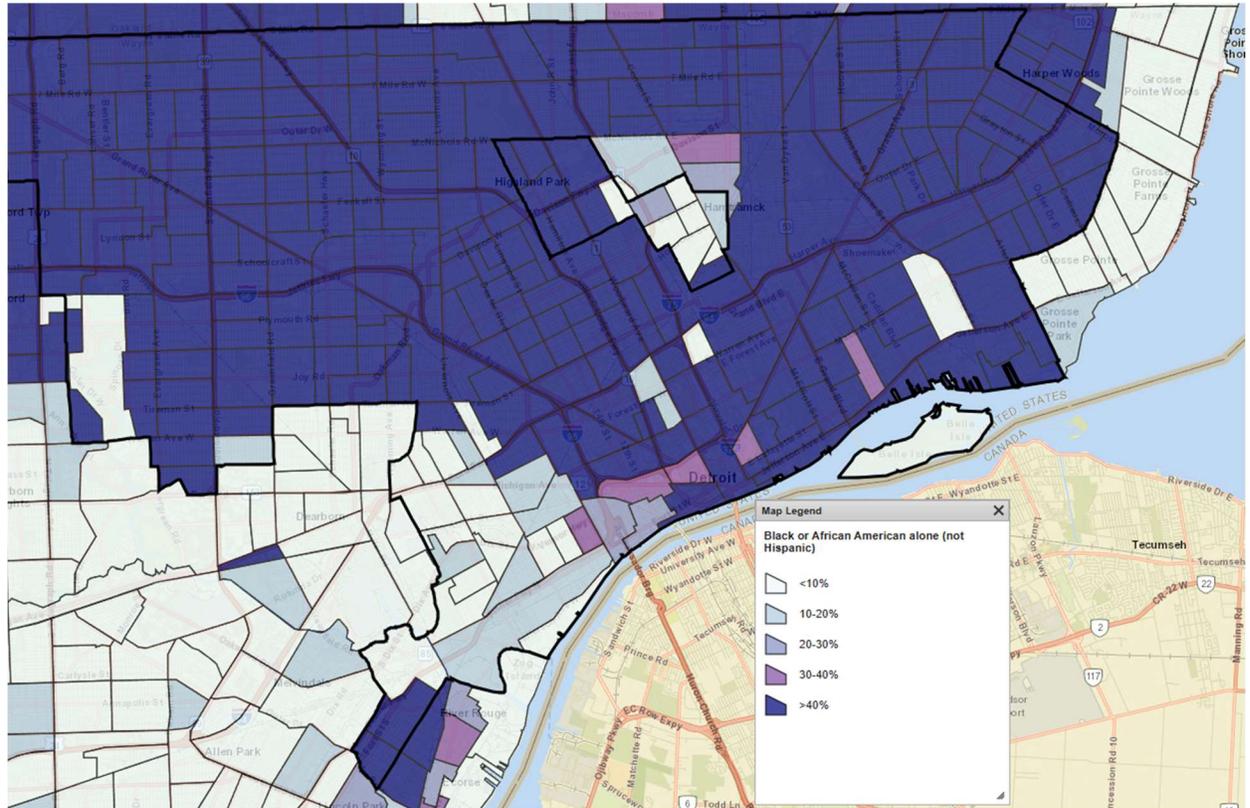
Minority Concentration - A close gathering or clustering of populations which are designated as minorities which historically are Non-White residents.

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

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

Black/African Americans comprised over 76% of Detroit's population and were located throughout the City of Detroit. Based data provided by HUD, almost the entirety of the city had a concentration Black/African American population of greater than 40%. The area where Black/African American are not concentrated is the southwest of the city, which is an area with a long-standing Hispanic population.

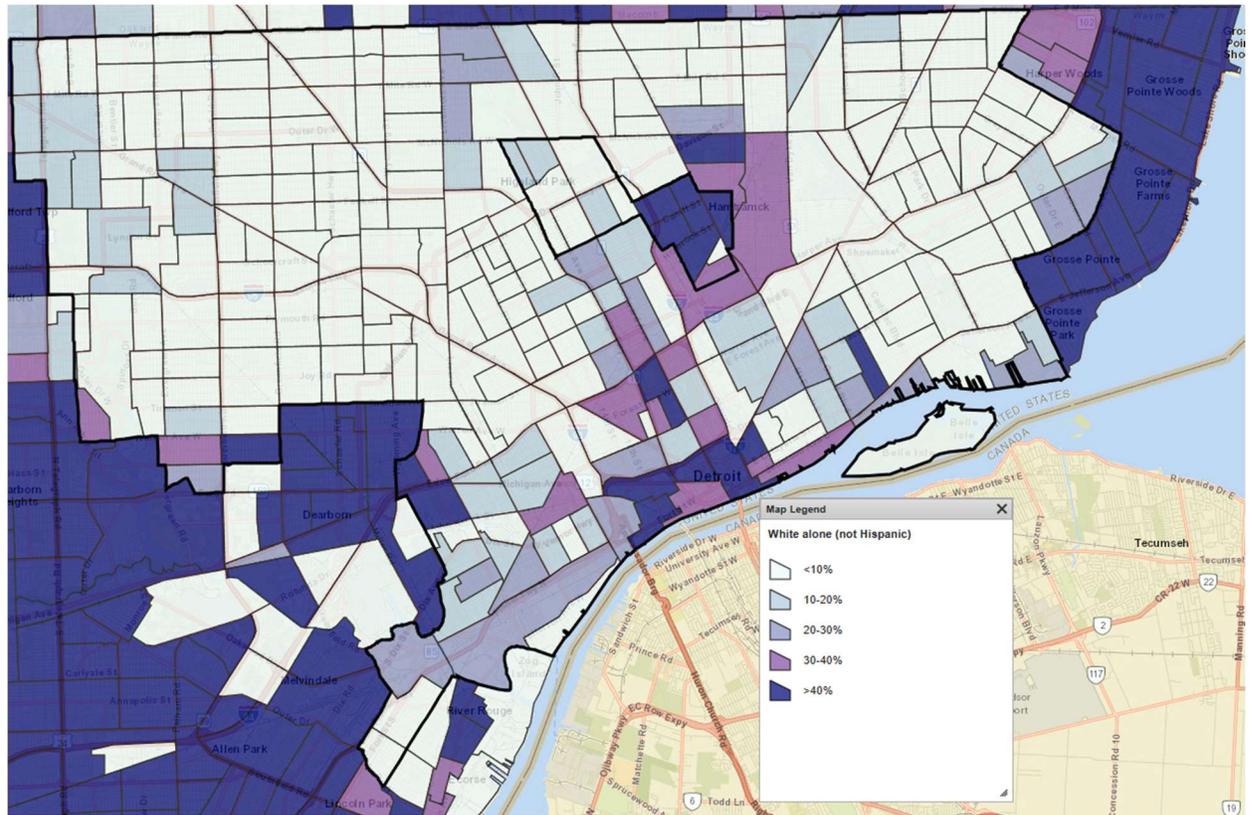
Figure 12. Percent Black or African American



Source: HUD CPD Maps, 2025

The concentration of White population is generally found in Midtown, Downtown, and areas along the riverfront. These areas have seen the development of new housing and accompanying gentrification. In some parts of these areas, the White population was greater than 30%. Additionally, the area near Hamtramck, a historically Polish community, also had a relatively high concentration of White population.

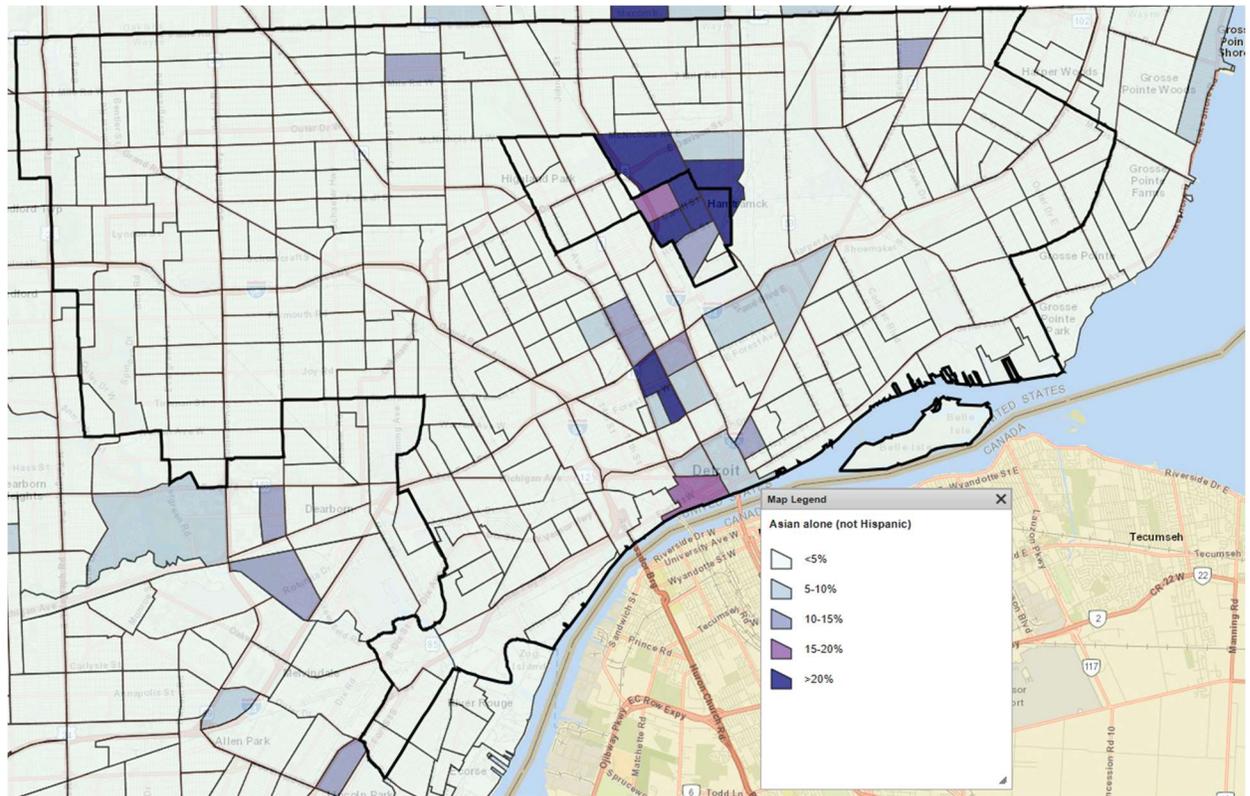
Figure 13. Percent White



Source: HUD CPD Maps, 2025

The Asian population in Detroit is generally found near Hamtramck, a historically Polish community, which in recent times has seen an increase in Arab and South Asian population. During the 1970's the Hmong population initially settled in the area and subsequent waves of immigration have resulted in an increased population. In 2020, the concentration of Asians around Hamtramck was greater than 20% and in some individual census tracts was more than 50%.

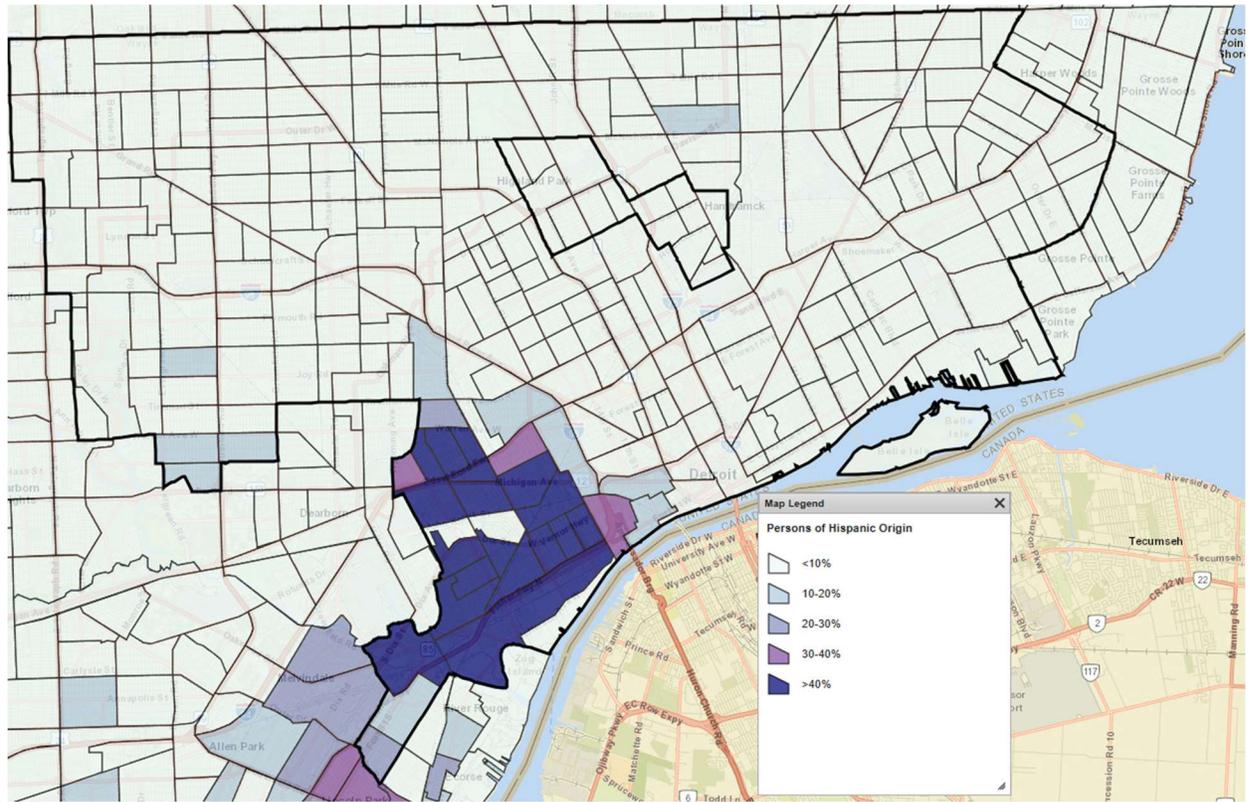
Figure 14. Percent Asian



Source: HUD CPD Maps, 2025

In 2020, the Hispanic population in Detroit was generally found in the southwest corner of the city. The neighborhood, Mexicantown had the highest concentration in the city with more than 40% of the population being Hispanic. This is a historically Hispanic area, as Latino households have been settling here for nearly 100 years.

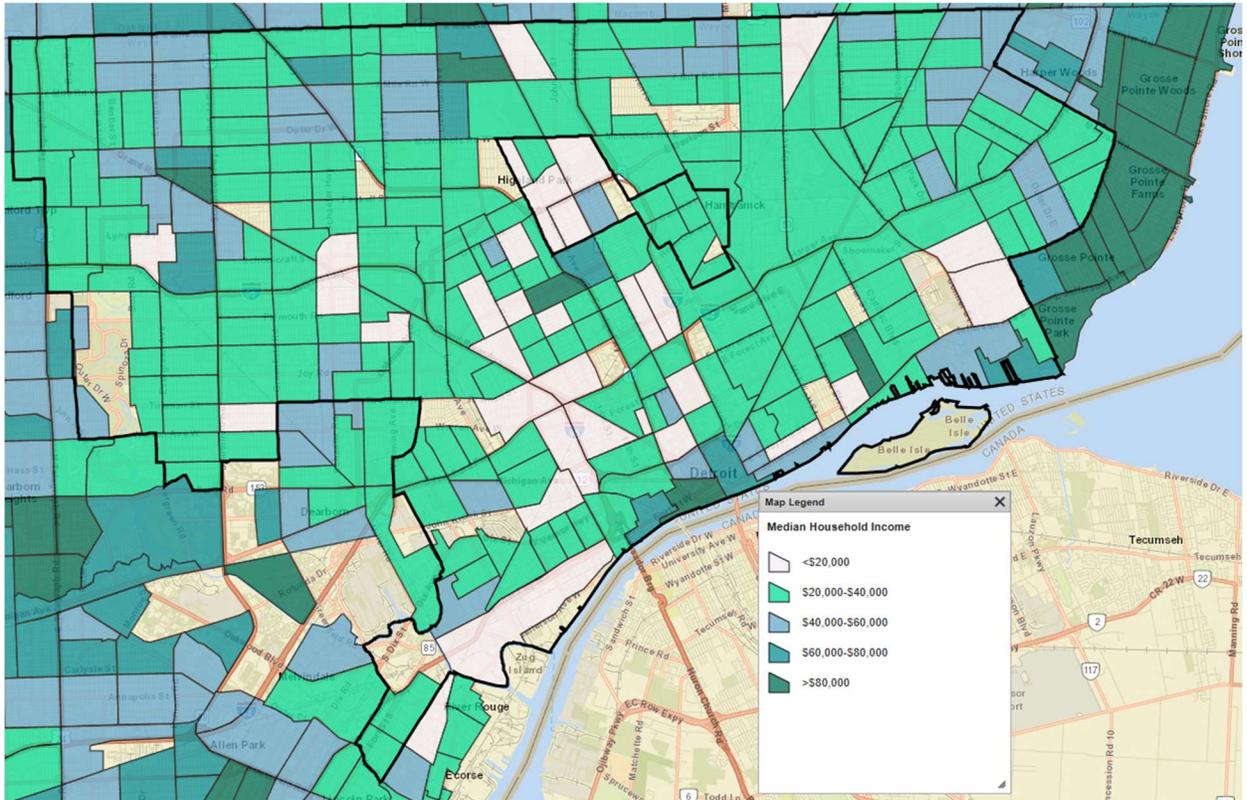
Figure 15. Percent Hispanic



Source: HUD CPD Maps, 2025

Figure 16 below presents households by income. What can be observed is the concentration of low-income households throughout the city, particularly in the urban core where there are many census tracts with median incomes below \$20,000.

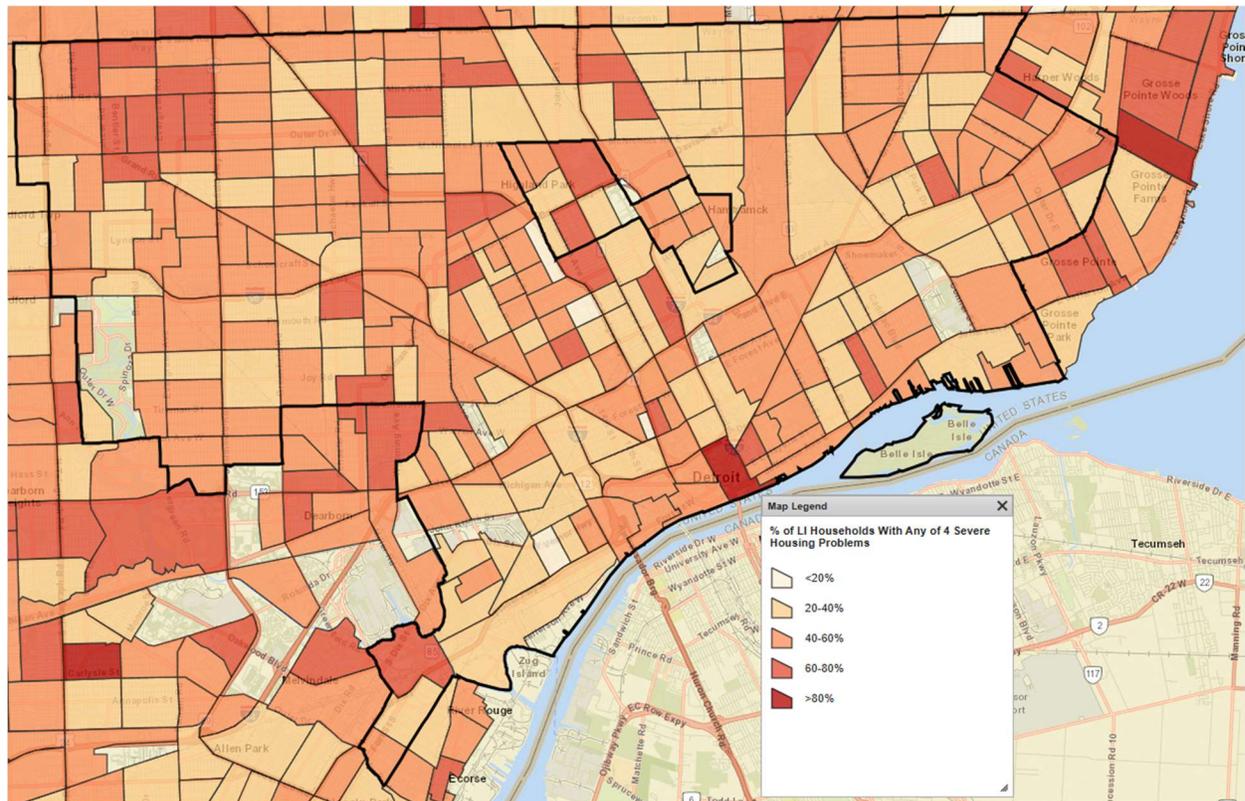
Figure 16. Median Household Income



Source: HUD CPD Maps, 2025

Figure 17 below shows the locations where low-income households with multiple housing problems are concentrated. In 2020, of the low-income households in the city, at least 20% have some sort of severe housing problem. In many census tracts the percentage rose to greater than 60% of low-income households with severe problems. And in a few cases, there were some concentrations greater than 80%, though the number of those cases are few. This illustrates the problems associated with housing and poverty in Detroit.

Figure 17. Percent of Low-Income Households with Housing Problems

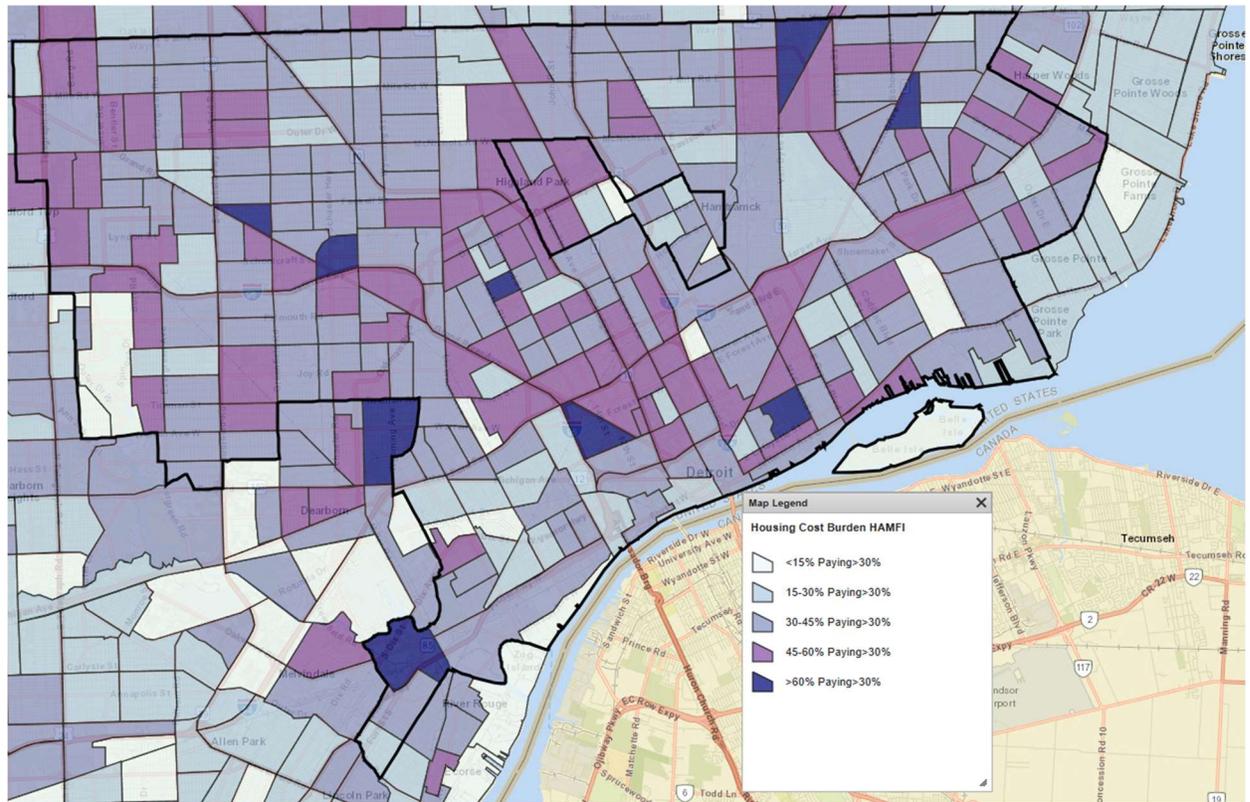


Source: HUD CPD Maps, 2025

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

The housing market across the city is dominated by generally low-income households with limited purchasing power. A key issue that was identified in the Needs Assessment was that in 2020 about 38% of all households in Detroit experienced cost burdening which limits their housing choices. Additionally, the existing housing stock is older and, in many cases, needs significant upgrades. Figure 18 presents cost burdening across the city.

Figure 18. Percent Housing Cost Burdened



Source: HUD CPD Maps, 2025

Are there any community assets in these areas/neighborhoods?

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

- District 3:
 - City Airport
 - Gateway Market Place Shopping
 - Conant Gardens
 - Bel Air Movie Theater (City of Detroit's only neighborhood movie theater)
 - Joe Randazzo's (fresh fruit market)
- District 5:
 - Belle Isle
 - GM Center
 - Rocket Mortgage headquarters
 - Eastern Market (farmer’s market and shops)

- Hollywood Casino at Greektown
- Ford Field
- Comerica Park
- People Mover
- Indian Village Historic Homes
- College of Creative Studies
- Cass Corridor
- The Villages
- Midtown
- District 6
 - Mexican Town
 - Wayne State University
 - Detroit Institute of Arts (museums and Detroit Symphony Orchestra)
 - TechTown Detroit
 - Qline.

Are there other strategic opportunities in any of these areas?

The Detroit Planning and Development Department (PDD) is leading planning in neighborhoods across the city via its neighborhood frameworks approach.¹⁶ The approach is guided by PDD's mission: a healthy and beautiful Detroit, built on inclusionary growth, economic opportunity, and an atmosphere of trust. The PDD plans include the East Design Region, Central Design Region, and West Design Region. The East Design Region serves Council Districts 3 and 4, the Central Design region serves Council Districts 5 and 6, and the West Design Region serves Council Districts 1, 2, and 7. The goal of the plans are to achieve neighborhood stabilization and revitalization and support the growth of population and jobs.

The following is a list of current frameworks by regions:¹⁷

- East Design Region
 - Greater Warren/Conner Framework Plan
 - The Greater Warren/Conner Framework Plan is a comprehensive study of the east side neighborhoods.
 - Gratiot / 7 Mile Framework Plan
 - City leaders and residents came together to create a plan for the neighborhoods near Gratiot and 7 Mile in northeast Detroit.
 - East Warren / Cadieux Neighborhood Plan
 - The East Warren / Cadieux Neighborhood Framework Plan is a plan of action, backed by dedicated funding resources, to guide future growth and investment in the neighborhood.
 - Campau-Davison-Banglatown

¹⁶ <https://detroitmi.gov/departments/planning-and-development-department/neighborhood-frameworks>

¹⁷ <https://detroitmi.gov/departments/planning-and-development-department/neighborhood-frameworks>

- The Warrendale/Cody Rouge Neighborhood Plan is a child-centric plan of action, co-crafted by residents and the City of Detroit to guide future growth and investment in the neighborhood.
- Russell Woods/Nardin Park
 - The framework plan highlights and protects the character of the neighborhood's future development.
- Grand River - Northwest
 - Neighborhood planning framework pairs a focus on commercial corridors with landscape design and green stormwater infrastructure in Northwest Detroit.
- Livernois - McNichols
 - The Fitzgerald Revitalization Project is an initiative led by the City of Detroit to stabilize and strengthen a neighborhood by transforming approximately 400 publicly owned vacant land and buildings into community assets. The vision is to transform a quarter square mile area by addressing every publicly owned vacant lot and house.

Neighborhoods where planning is currently underway include:

- Brightmoor Framework Plan
 - The Planning and Development Department is working to develop a comprehensive neighborhood framework plan that includes the identification of vacant public land landscape, parks, housing redevelopment, economic development, utilization of public vacant land, and Green Stormwater Infrastructure strategies for the Brightmoor Framework Area.
- Grixdale Farms Framework Plan
 - This project seeks to stabilize the Grixdale Farms Neighborhood by identifying opportunities for improvement of economic development, housing and vacant land strategies, open space, and the ability to move throughout the neighborhood safely and efficiently.
- Joe Louis Greenway (24 neighborhoods surrounding the greenway)

The Joe Louis Greenway is a 27.5-mile planned non-motorized trail and linear park in Detroit that is reclaiming vacant industrial spaces to improve access to nature, play, and recreation for all Detroiters

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

Broadband Requirements

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

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

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

- Included a description of broadband needs in the housing market analysis.
- Contacted public and private organizations, including broadband internet service providers, and organizations engaged in narrowing the digital divide.
- While not specifically connected to the Consolidated Planning process, the city recently hired, in 2019, its first full time Director of Digital Inclusion, whose mission is assisting the city in addressing digital inequities and expanding internet access for all residents.

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

Access and the Digital Divide

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

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

Computer and Internet Use in the City of Detroit

	2020		2021		2022		2023	
	Estimate	%	Estimate	%	Estimate	%	Estimate	%
Total	270,446	100.00%	260,383	100.00%	260,383	100.00%	253,207	100.00%

Has a Computer:	231,807	85.71%	206,646	79.36%	206,646	79.36%	231,008	91.23%
With Dial-Up Internet Subscription Alone	581	0.21%	795	0.31%	795	0.31%	479	0.19%
With a Broadband Internet Subscription	189,924	70.23%	150,940	57.97%	150,940	57.97%	205,512	81.16%
Without an Internet Subscription	41,302	15.27%	54,911	21.09%	54,911	21.09%	25,017	9.88%
No Computer	38,639	14.29%	53,737	20.64%	53,737	20.64%	22,199	8.77%

Source: American Community Survey, 2020-2023, U.S. Census Bureau. Table B28003

According to annual estimates through the ACS, from 2020-2023 the number of households in Detroit with broadband access increased by 8%. As of 2023, about 81% of all Detroit households had access to broadband internet and 91% had access to a computer. Households without an internet subscription dropped 39% over the same four-year period.

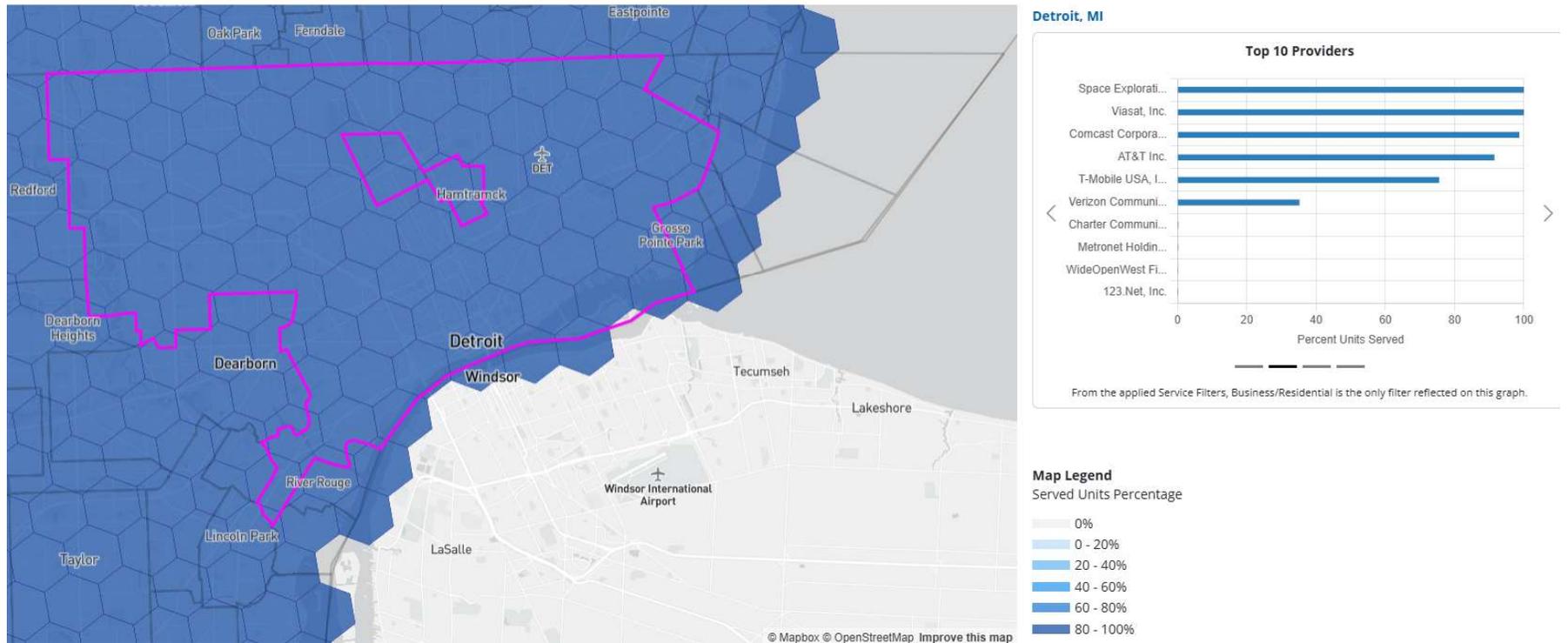
The Federal Communications Commission’s (FCC) Broadband Deployment data from February 2025 shows that 100% of Detroit’s population has access to at least three or more internet providers. Access to the internet is higher in Detroit than the number of current household subscriptions, suggesting some digital divide which could be attributed to cost, skills/knowledge gap, reluctance to adopt new technology, or need for a connection.

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

The city’s residential fixed broadband internet access is served by many different companies, all of whom provide 100% coverage to the area. The main internet service providers include Space X, Viasat, Comcast’s Xfinity, AT&T, T-Mobile, and Verizon. These companies compete amongst each other in the place and vary based on price and network speed.

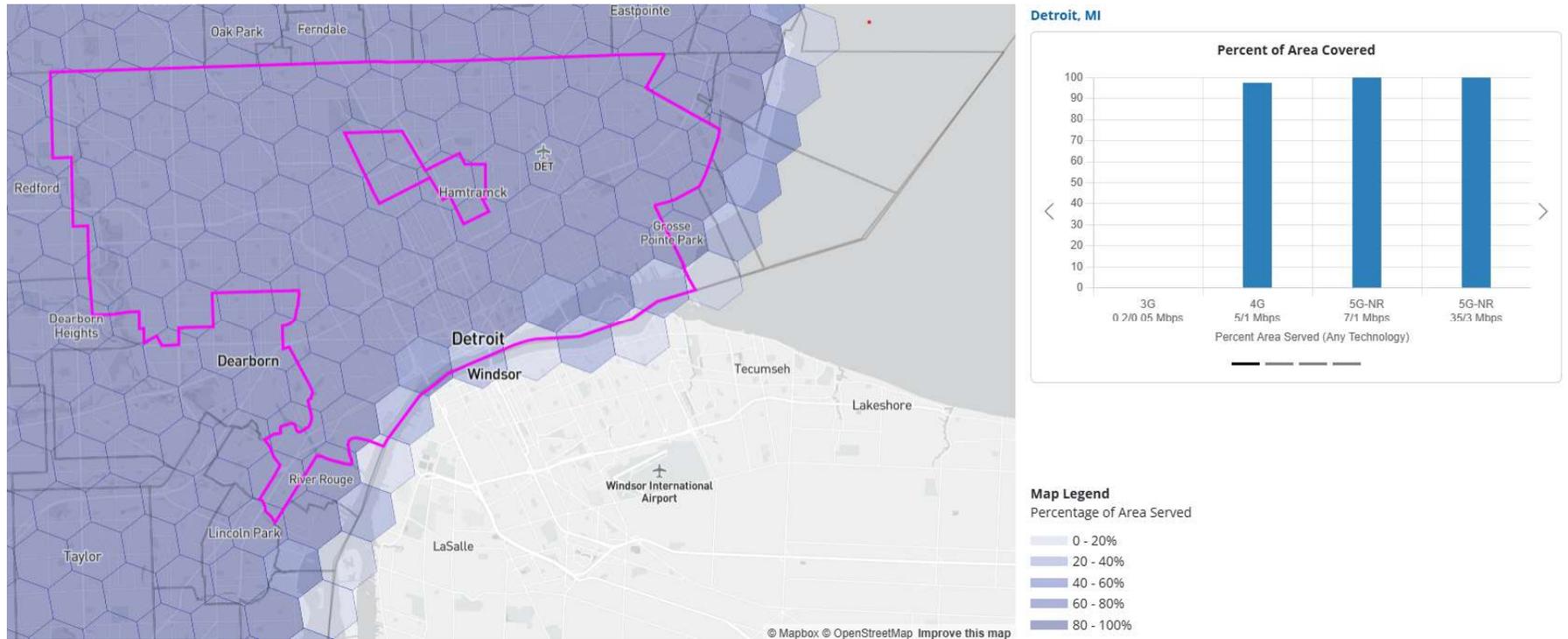
The city’s mobile broadband internet access is also served by many different companies, all of whom provide 100% coverage to the area. The main internet service providers include Space X, Viasat, Comcast’s Xfinity, AT&T, T-Mobile, and Verizon. These companies compete amongst each other in the place and vary based on price and network speed.

Figure 19. Fixed Broadband Map



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

Figure 20. Mobile Broadband Map



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

Although broadband coverage and service is available for nearly the entire city, many Detroit residents are not connected to broadband service either because of where they live or for financial reasons. To assist residents in meeting their needs for broadband access, some service providers have qualifying lower-cost broadband plans. For example, AT&T currently offers the “Access Program” which provides low-cost residential internet service to qualifying households that have at least one resident who participates in U.S. SNAP and resides at an address within AT&T’s service area.¹⁸ This program provides 3-50 Mbps internet service speeds at a cost of \$30 per month.

Comcast’s Xfinity offers the Internet Essentials program which qualifying low-income households can access 75 Mbps service for \$14.95/month plus tax, or 100 Mbps service for \$29.95/month plus tax. Households can fill out an application online and must provide documentation to show they are in need. To qualify, a household must:

- Live in an area where Xfinity Internet service is available
- Qualify for programs like the National School Lunch Program, housing assistance, Medicaid, SNAP, and others
- Have not had Xfinity Internet within the last 90 days
- Have no outstanding debt to Comcast that is less than one year old

¹⁸ <https://www.att.com/internet/access/>

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

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

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

As extreme weather events impact the lives of Detroit residents, it is important to mitigate against such risks especially for the most vulnerable. Resiliency means strengthening infrastructure and giving communities the resources to protect themselves against the harmful effects of severe weather events and recover afterwards.

Some strategies to help residents vulnerable to natural hazards include:

- Reducing Risk of Flooding
- Protecting from Extreme Heat
- Improving Air Quality

The scale of housing challenges related to potential severe weather events are exacerbated by the age of the housing stock in Detroit. More than 58% of the housing stock in Detroit was built prior to 1950 and 90% was built prior to 1980. Housing units of this age were generally not built with disaster/weather related resiliency design considerations. Further, the infrastructure built/installed at the time of housing construction has aged and is prone to failure when stressed by extreme weather events. As this housing stock faces high incidences of deferred maintenance, investments are needed to prevent new vacancies and reduce unsafe living conditions for residents.

The City of Detroit proposed CDBG- Disaster Recovery activities that will improve access to safe and healthy housing for low-to moderate (LMI) people who otherwise do not have access to the resources to prevent the impacts of disasters such as these. LMI Detroit residents can face unique challenges and have more difficulty responding to disaster events than the general population due to physical and financial capabilities, health concerns, and location and quality of their housing, among other factors.

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

DHSEM focuses on the five mission areas – prevention, protection, mitigation, response, and recovery by preparing comprehensive emergency response plans. These include the Citywide Evacuation and Mass Sheltering Plan, Hazard Mitigation Plan, and Adverse Weather Response Team Plan.

DHSEM is also responsible for a wide range of critical emergency management activities.

The impact on Detroit's aging stormwater systems could lead to flooded basements and streets and sewage overflows into the Detroit River and Lake Erie.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

Generally, in the case of disruption stemming from a natural disaster such as a flood, residents most vulnerable are those that depend on hourly wage employment, including low-mod households, as they do not receive wages if they cannot work in the wake of a disaster. Low- and moderate- income

households may also have more difficulty recovering from storm related housing damage and may require additional community resources and support, such as rehabilitation and home repair programs.

The City of Detroit released its Sustainability Action Agenda, through its Office of Sustainability, which includes 43 action items *“to address the city’s numerous sustainability issues and outlines ways to improve the health, environment, and resiliency of Detroit and its residents.”* The Sustainability Action Agenda is divided into four buckets. Click on the links below.

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

[Detroit releases Sustainability Action Agenda to address city’s sustainability issues - Curbed Detroit Detroit-Sustainability-Action-Agenda-Web.pdf \(detroitmi.gov\)](#)

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

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

As Detroit grows, the City must ensure that all residents can afford efficient, quality homes free of hazardous materials. The City works to minimize the involuntary displacement of longtime Detroiters, who have been central to the city’s growth, and to maintain affordable housing options throughout the city. The city can bolster existing affordability strategies by reducing utility costs and eliminating exposure to toxic materials in homes. Detroit residents will not only have affordable housing options, but also quality ones. Increased housing investment and demand places pressure on the existing affordable housing stock. This sharply increases rents and property values, which is problematic for many Detroiters. The following strategies were used to address the vulnerability of housing occupied by low- and moderate-income households:

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

Strategic Plan

SP-05 Overview

City of Detroit 2025–2029 Consolidated Plan Strategic Overview

The City of Detroit’s 2025–2029 Consolidated Plan outlines a bold, data-driven vision to advance neighborhood revitalization, affordable housing, and economic opportunity, while addressing public health, homelessness, and infrastructure needs. Anchored by a five-year projection of \$223.4 million in HUD entitlement funds, the plan combines federal, local, and private resources to implement a coordinated strategy of inclusive community development.

Over the five-year period, the City of Detroit anticipates receiving approximately \$161.1 million in Community Development Block Grant (CDBG) funding, \$29.9 million from the HOME Investment Partnerships Program, \$14.3 million through the Emergency Solutions Grant (ESG) program, and \$17.7 million from the Housing Opportunities for Persons With AIDS (HOPWA) program. These resources will be directed to a range of eligible activities, including housing rehabilitation, homelessness prevention, job creation, public services, and infrastructure development. Supplementing these funds are major private-sector contributions, including the Strategic Neighborhood Fund and Detroit Housing for the Future Fund.

Geographically, the City will prioritize investments across three distinct areas: citywide initiatives (receiving 79% of funds), Neighborhood Revitalization Strategy Areas (18%), and designated Slum and Blight Areas (3%). Five NRSAs, renewed for the new plan cycle, were selected based on criteria such as income levels and neighborhood continuity. These areas serve as focal points for flexible use of CDBG funds, allowing Detroit to implement tailored strategies that stabilize housing stock, enhance property values, stimulate small business growth, and foster youth employment and family wealth-building.

The City’s strategic plan places homelessness prevention and intervention at the center of its efforts, in alignment with its partnership with the local Continuum of Care (CoC). Detroit’s Coordinated Assessment Model (CAM) has emerged as a robust system for intake and referral, connecting thousands of individuals annually to shelter and housing resources. Notable expansions include an increase in emergency shelter beds from 924 to 1,414, Detroit’s highest ever, alongside the launch of Immediate Shelter Drop-In Centers in late 2024. CAM integrates standardized assessments to route individuals and families to programs such as Rapid Rehousing (891 beds) and Permanent Supportive Housing (2,947 beds), ensuring equitable and timely access to housing.

The City has also expanded targeted homelessness services for veterans, families, and unaccompanied youth. Programs like HUD-VASH, SSVF, and ESG-funded Rapid Rehousing provide housing subsidies and supportive services. Additionally, coordination with the Department of Veterans Affairs and local youth shelters ensures that vulnerable populations have access to transitional and long-term housing options. Prevention efforts extend to individuals exiting institutions like foster care, hospitals, or prisons. Through coordinated discharge protocols and wraparound services—such as rental assistance, SOAR applications,

and mental health referrals—the City aims to reduce first-time homelessness and support long-term housing stability.

Public housing strategies under the Detroit Housing Commission (DHC) emphasize self-sufficiency, homeownership, and civic participation. The DHC facilitates resident engagement through its Resident Advisory Board and Resident Councils across public housing communities. Support programs help residents transition from renting to owning by offering financial literacy training, home maintenance education, and access to down payment assistance. Employment pathways are also central, with job training and placement services delivered through programs like Resident Opportunities and Self-Sufficiency (ROSS) and Family Self-Sufficiency (FSS).

Detroit continues to address environmental health risks through aggressive lead-based paint hazard remediation. In partnership with HUD’s Office of Lead Hazard Control and Healthy Homes, the City targets households with young children and pregnant women through federally funded programs and the 0% Interest Home Repair Loan Program. Four active HUD grants are expected to assist over 500 units during the plan period, complemented by local health department initiatives such as blood lead testing, home inspections, and case management. The Detroit Lead Reduction Task Force is actively working toward a 50% reduction in elevated blood lead levels by 2027, while recent citywide legislation has strengthened rental inspection enforcement to prioritize lead safety and housing quality.

The plan also identifies a broad array of strategic goals that respond directly to community needs, as identified through public surveys and stakeholder input. High-priority areas include homelessness reduction, housing rehabilitation, economic development, and infrastructure improvement. Public services—especially for seniors, youth, and persons with disabilities—are slated for expanded investment. Public input heavily emphasized the need for mental health services, homeless outreach, transportation, childcare, and fair housing education. Simultaneously, economic development initiatives will provide support for small businesses, job training, and commercial corridor enhancements.

Through a comprehensive, neighborhood-focused, and activities and actions that do not violate any applicable Federal anti-discrimination laws, including Title VI of the Civil Rights Act of 1964, the 2025–2029 Consolidated Plan positions Detroit to strengthen its housing ecosystem, elevate public health, and create pathways to opportunity for its residents. Guided by public engagement and performance data, this plan represents the City’s commitment to ensuring that every neighborhood and every resident has a fair chance at long-term prosperity and stability.

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

Geographic Area

Table 49 - Geographic Priority Areas-Warren

Target Area	Percentage of Funds
Citywide	85
Slum and blight areas	2
NRAs	13

General Allocation Priorities

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

The Consolidated Plan regulations require the City to describe the geographic areas of the city in which it will direct assistance during the ensuing program year. Although it is not mandatory to establish locally designated target areas where efforts will be concentrated, HUD strongly encourages grantees to do so. The City of Detroit identified Neighborhood Revitalization Strategy Areas (NRSAs) and Slum and Blight Areas (SBAs) to focus its investments. Also, public facilities and infrastructure activities meet the CDBG National Objectives through the use of an “area benefit” where at least 51% of the population served must be low to moderate-income individuals and households.

Neighborhood Revitalization Strategy Areas Renewal

The City is applying to HUD for the renewal of five areas as Neighborhood Strategy Areas (NRSAs) to focus its investment on neighborhoods that meet the NRSA criteria. The City received HUD approval of five NRSAs in 2014-2015 and renewed the areas with some variation in the 2020-2024 Consolidated Plan period. In both periods, the HRD successfully implemented the strategies, met its benchmarks, attracted significant investment in the areas, and benefited low-to-moderate income households through the NRSA strategies and activities.

For the proposed 2025-2029 NRSA application, the City’s HRD conducted a structured and inclusive consultation process to ensure that local needs and priorities shape the revitalization strategy. This process involves active engagement of residents, neighborhood groups, nonprofits, and businesses in shaping NRSA boundaries and priorities through tools such as surveys, public meetings, and focus groups, including targeted public and agency stakeholder surveys. A draft NRSA plan was then be made publicly available for review, allowing a formal comment period of 15 days, during which the City collected and considered feedback and made revisions, as needed. Finally, collaborative planning with housing agencies, service providers, and partners ensures the strategy aligns with wider community development goals.

The public consultation process helped identify housing and economic development opportunities and the leveraging public and private sector investment for the new NRSAs. The map below represents the new NRSAs which were determined by at least 70% of the population being low- and very low-income

households, over 60 percent primarily residential, and all areas within the NRSA are contiguous.

The NRSA Plan leverages Community Development Block Grant funds to boost market confidence in Detroit neighborhoods by stabilizing housing, raising home values, supporting small businesses, preparing youth for employment, and building family wealth. It offers greater flexibility in using CDBG funds, enabling the City to assist a wider range of residents and business owners who might not otherwise qualify. The strategy comprises several interrelated initiatives:

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

Slum and Blight Designation

The issue of vacant or substandard homes contributes significantly to the broader problem of slum and blight. To address this, the City will continue using the slum and blight area designation as outlined in 24 CFR 570.208(b)(1). This designation supports activities aimed at preventing or eliminating slums or blight within designated areas. The City will maintain its blight reduction efforts both citywide and within the three designated slum and blight areas adjacent to the NRSA, as previously described.

Map # ___ 2025 NRSA

2025 Neighborhood Revitalization Strategy Areas (NRSA)

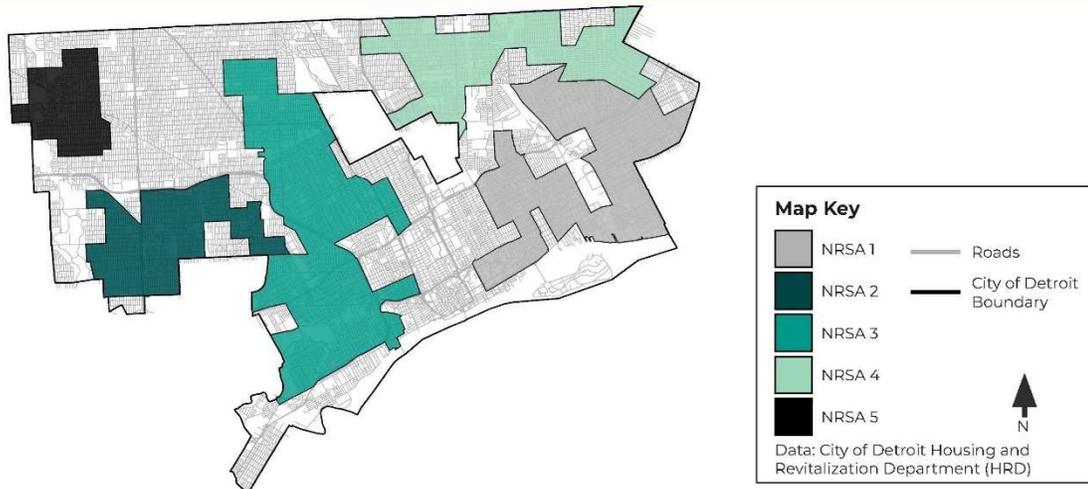


Table 50 - Geographic Priority Areas

1	Target Area Name:	NRSA Areas
	Target Area Type:	Strategy area
	Other Target Area Description:	
	HUD Approval Date:	To be determined by HUD approval date
	% of Low/ Mod:	70% of population is low- to moderate-income
	Identify the neighborhood boundaries for this target area.	<p>There are five new NRSA areas based on 2020 ACS data.</p> <p>NRSA 1: The boundaries are as far west as Saint Aubin Street, and spans encompasses areas to the east as far as Calvin Avenue. The southern boundary is Jefferson Avenue as well as the Detroit River, while the northern boundary is as far north as E. McNichols Road.</p> <p>NRSA 2: The boundaries are as far west as Trinity Street, as far south as Paul Street, as far east as Livernois Avenue, and as far north as Interstate 96.</p> <p>NRSA 3: The southern boundary is Interstate 75, the western boundary abuts the City of Detroit’s boundary, the northern boundary is W 7 Mile Road, and the most eastern portion follows Woodward Avenue.</p> <p>NRSA 4: The boundaries are as far north as 8 Mile Road, as far west as Interstate 75, as far east as Interstate 94, and as far south as Brockton Street.</p> <p>NRSA 5: The southern boundary is Lyndon Street, the western boundary is the Detroit city line, the eastern boundary is Outer Dr. W, and the northern boundary is Pembroke Avenue</p>
	Include specific housing and commercial characteristics of this target area.	<p>NRSA 1</p> <p>NRSA 1 exhibits high levels of housing vacancy and aging residential structures, with 81% of its homes built before 1940. Only 46% of units are owner-occupied, below the citywide average. The area has the highest percentage of elderly residents (15%) and a significant share of households with incomes below \$15,000 annually. Commercially, it has 4% of its land designated as vacant commercial property and</p>

		<p>43% as vacant residential, the highest among all NRSA's. These conditions highlight the need for substantial investment in housing stabilization and neighborhood revitalization.</p> <p>NRSA 2</p> <p>Housing in NRSA 2 is moderately older, with 36% of homes built between 1940 and 1969 and 53% built before 1940. It has slightly higher than average homeownership at 50% and the largest youth population, with 29% under the age of 18. Economically, 19% of local employment is in healthcare, providing a comparative industry advantage. The area has 27% of land classified as vacant residential and 3% as vacant commercial, offering redevelopment opportunities with less vacancy pressure than NRSA 1.</p> <p>NRSA 3</p> <p>NRSA 3 is the most populous and ethnically diverse area, containing neighborhoods like Mexicantown with a 28% Hispanic/Latino population and a significant Asian community. Only 1% of homes were built after 2010, and 74% were built before 1940, indicating an aging housing stock. Homeownership is around 49%, close to the city average. Although the area has 34% vacant residential land and 4% vacant commercial land, it also has one of the lowest median home values and rents, which may offer affordability but signals disinvestment.</p> <p>NRSA 4</p> <p>NRSA 4 has the highest concentration of manufacturing employment (18%), and the second-highest percentage of homes built before 1940 (55%). It has relatively low homeownership at 46% and the smallest elderly population (10%). This NRSA exhibits better income metrics than others and has the lowest share of vacant residential land (22%). With its industrial base and lower vacancy, NRSA 4 stands out for economic potential, although aging housing still poses a challenge.</p> <p>NRSA 5</p>
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		<p>NRSA 5 has the fewest residents and a relatively balanced housing tenure, with 53% owner-occupied housing, the highest among the NRSA's. Its housing stock includes 46% built before 1940 and 8% between 1970 and 1989, making it slightly newer than other areas. It has a low percentage of elderly residents and relatively strong educational attainment. Commercially, 33% of land is vacant residential and 3% is vacant commercial, suggesting moderate redevelopment pressure.</p>
	<p>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</p>	<p>HRD staff used a comprehensive citizen participation process that educated the resident about the target areas and the NRSA benefits and the community gave feedback on continuing to use the strategy. Over 1,100 persons participated in the process.</p>
	<p>Identify the needs in this target area.</p>	<p>NRSA 1</p> <p>NRSA 1 faces significant housing distress, with 81% of homes built before 1940 and a vacancy rate higher than the city average. The area has the highest elderly population among all NRSA's and the largest share of extremely low-income households. Educational attainment is low, with only 14% holding a bachelor's degree or higher. Median home values and rents are also below citywide averages. Vacant residential land comprises 43% of the area, the highest of any NRSA. These conditions highlight the need for targeted investment in housing rehabilitation, senior services, and economic development.</p> <p>NRSA 2</p> <p>NRSA 2 has the largest percentage of children under 18, indicating a strong need for youth services, education, and family support programs. It also faces income challenges, with over 40% of households earning below the poverty line. A significant share of the housing stock was built before 1940, and 27% of residential land is vacant. Healthcare represents a key local employment sector, providing opportunities for workforce development. Educational attainment is slightly below average, and improving access to quality schools and economic opportunities remains a priority.</p>

		<p>NRSA 3</p> <p>NRSA 3 is Detroit’s most populous and ethnically diverse NRSA, with significant Hispanic/Latino and Asian populations, particularly in areas like Mexicantown. It has the oldest housing stock, with 74% built before 1940, and the second-highest residential vacancy rate. Median home values and rents are among the lowest in the city, highlighting disinvestment. The area also reports the highest share of residents without a high school diploma. These indicators underscore the need for language-accessible services, affordable housing investments, and education-focused initiatives.</p> <p>NRSA 4</p> <p>NRSA 4 has the highest concentration of manufacturing jobs (18%) but also low homeownership (46%) and the lowest share of older adults. The housing stock is aging, with 93% built before 1970. It has the lowest residential vacancy rate (22%), suggesting a more stable housing market. Median household income is slightly higher than other NRSA, though still below citywide levels. There is strong potential for workforce development tied to its manufacturing base, but support is needed to preserve housing and improve educational outcomes.</p> <p>NRSA 5</p> <p>NRSA 5 is the smallest NRSA by population but has the highest rate of homeownership (53%) and a more balanced age distribution. About 33% of the land is classified as vacant residential, and the housing stock, while still old, includes a slightly higher share of newer structures. Educational attainment is relatively strong, with the highest share of residents holding some college education. Nonetheless, the area still faces challenges related to low income, vacant properties, and aging infrastructure. Investment is needed to support home repairs, infill development, and youth services.</p>
	<p>What are the opportunities for improvement in this target area?</p>	<p>NRSA 1</p> <p>NRSA 1 has strong potential for improvement through targeted housing rehabilitation and senior support services,</p>

	<p>given its large share of aging homes and elderly residents. Its high volume of vacant residential land creates opportunities for infill development, affordable housing construction, and strategic greening initiatives. Public-private partnerships could revitalize key corridors, and investments in education and workforce development could improve economic mobility.</p> <p>NRSA 2</p> <p>With its large youth population, NRSA 2 is well-positioned for investment in education, youth programming, and family services. The healthcare sector’s strong presence offers a foundation for career pathway development. Vacant parcels present opportunities for new housing or mixed-use development. Enhancing school quality and leveraging neighborhood anchors could catalyze long-term growth.</p> <p>NRSA 3</p> <p>NRSA 3’s cultural diversity and central location make it ideal for targeted economic development, culturally relevant services, and inclusive housing strategies. The presence of active community organizations and anchor institutions offers partnership opportunities for bilingual outreach, workforce training, and small business development. Revitalization efforts could focus on improving housing quality and promoting homeownership, especially among low-income families.</p> <p>NRSA 4</p> <p>NRSA 4’s stable housing market and industrial base provide a strong platform for revitalization. Opportunities exist to expand homeownership through repair programs and down payment assistance. Workforce development efforts can align with local manufacturing employers. Additional investments in education and infrastructure could further support growth.</p> <p>NRSA 5</p> <p>With the highest homeownership rate and strong educational attainment, NRSA 5 can be strengthened through home repair and infill development programs. The</p>
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		<p>area’s moderate vacancy provides room for targeted new housing without large-scale displacement. Enhanced youth services and small business support could leverage community stability and promote equitable growth.</p>
	<p>Are there barriers to improvement in this target area?</p>	<p>NRSA 1</p> <p>Barriers to improvement in NRSA 1 include significant housing deterioration, limited financial capacity among residents, and a high volume of vacant land requiring large-scale investment. Low educational attainment and a large senior population further constrain workforce development efforts. These challenges make it difficult to attract private investment without coordinated public support.</p> <p>NRSA 2</p> <p>NRSA 2 faces barriers related to concentrated poverty, aging infrastructure, and underperforming schools. Although the area has a strong youth presence, limited access to quality education and job training hinders long-term advancement. Vacant properties and fragmented ownership present additional challenges for redevelopment.</p> <p>NRSA 3</p> <p>In NRSA 3, linguistic and cultural barriers can limit resident engagement and access to services. The area also suffers from deep disinvestment, with aging housing, low property values, and persistent poverty. Challenges in building trust and ensuring inclusive outreach may impede implementation unless culturally sensitive strategies are prioritized.</p> <p>NRSA 4</p> <p>Barriers in NRSA 4 include a limited supply of quality affordable housing and lower homeownership rates, despite its industrial base. Environmental concerns linked to past manufacturing uses may also complicate redevelopment. Workforce development must also address skill mismatches and accessibility for residents.</p> <p>NRSA 5</p>

		Though NRSA 5 is relatively stable, barriers include insufficient investment in infrastructure and persistent pockets of vacant land. The small population base may limit economies of scale for service delivery. Maintaining affordability while pursuing new development also poses a challenge for long-term equitable growth.
2	Area Name:	Slums and Blight Designation
	Area Type:	City approved Slum and Blight Areas
	Other Target Area Description:	City approved Slum and Blight Areas
	HUD Approval Date:	Not applicable. City designation based on State requirements
	% of Low/ Mod:	
	Revitalization Type:	Slum and blight removal and redevelopment of substandard structures
	Other Revitalization Description:	<p>There are three designated Slum and Blight Areas.</p> <ol style="list-style-type: none"> 1. Cody Rouge and Warrendale - Bounded roughly by Rouge Park to the West, Fullerton/I-96 to the North, Southfield Freeway to the east (includes east of Southfield freeway at Tireman), and the City boundaries to the South. 2. Delray - Generally bounded by I-75 to the North, Grand Blvd to the East, Jefferson to the South, and Rouge River to the West. 3. Conant-Davison - Bounded generally by Davison and McNichols to the North, Mount Elliot to the East, and the City boundary with Hamtramck/Highland Park to the South and West.
Include specific housing and commercial characteristics of this target area.	<p>Cody Rouge and Warrendale</p> <p>As of 2025, Cody Rouge and Warrendale continue to face challenges related to property conditions. Despite a \$7.4 million investment through the Strategic Neighborhood Fund to revitalize commercial corridors and green spaces, a significant portion of properties remain in poor condition.</p>	

		<p>Efforts are ongoing to address blight and improve housing stability.</p> <p>Delray</p> <p>Delray remains one of Detroit's most industrialized and depopulated neighborhoods. The area continues to struggle with high vacancy, deteriorated housing stock, and the effects of industrial encroachment and infrastructure development. These conditions pose ongoing challenges to residential revitalization and environmental health.</p> <p>Conant-Davison (Banglatown)</p> <p>Banglatown has seen positive community-driven investments, including gardens, art spaces, and home renovations. However, many properties remain in poor condition. Numerous vacant lots are owned by the Detroit Land Bank Authority, and while redevelopment efforts are underway, continued investment is needed to fully address the blight and stabilize the area.</p>
	<p>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</p>	<p>HRD staff used a comprehensive citizen participation process that educated the resident about the target areas and the NRSA benefits and the community gave feedback on continuing to use the strategy. Over 1,100 persons participated in the process.</p>
	<p>Identify the needs in this target area.</p>	<p>"Blighted Area" means a portion of a municipality, developed or undeveloped, improved or unimproved, with business or residential uses, marked by a demonstrated pattern of deterioration in physical, economic, or social conditions, and characterized by such conditions as functional or economic obsolescence of buildings or the area as a whole, physical deterioration of structures, substandard building or facility conditions, improper or inefficient division or arrangement of lots and ownerships and streets and other open spaces, inappropriate mixed character and uses of the structures, deterioration in the condition of public facilities or services, or any other similar characteristics which may include any buildings or improvements not in themselves obsolescent, and any real property, residential or nonresidential, whether improved or unimproved, the acquisition of which is considered necessary for the rehabilitation of the area. It is</p>

		expressly recognized that blight is observable at different stages of severity, and that moderate blight untreated creates a strong probability that severe blight will follow. Therefore, the conditions that constitute blight are to be broadly construed to permit a municipality to make an early identification of problems and to take early remedial action to correct a demonstrated pattern of deterioration and to prevent worsening of blight conditions.
	What are the opportunities for improvement in this target area?	The 0% interest home loan program and the senior home repair programs will be extended to the three designated Slum and Blight Areas. The rehabilitation of substandard housing can improve housing conditions and inspire neighbors to improve their property.
	Are there barriers to improvement in this target area?	Continued housing foreclosures and population loss can exacerbate a demonstrated pattern of deterioration and conditions.
3	Area Name:	City-Wide
	Area Type:	City-Wide
	Other Target Area Description:	City-Wide
	HUD Approval Date:	
	% of Low/ Mod:	
	Revitalization Type:	Not applicable
	Other Revitalization Description:	
	Identify the neighborhood boundaries for this target area.	City-wide projects can be established in any eligible area within the City of Detroit.
	Include specific housing and commercial characteristics of this target area.	Through citizen input, areas in need of intervention have been identified and assigned various levels of assistance according to area housing, blight, and service needs.
How did your consultation and citizen participation process help you to identify	HRD staff used a comprehensive citizen participation process that educated the resident about the target areas and the NRSA benefits and the community gave feedback on	

	this neighborhood as a target area?	continuing to use the strategy. Over 1,100 persons participated in the process.
	Identify the needs in this target area.	Public Services, demolition, and other programs are done on a City-wide basis.
	What are the opportunities for improvement in this target area?	As strategic areas are identified by Detroit Future City and Investment Strategy initiatives HRD can assign more funding to target areas within the City.
	Are there barriers to improvement in this target area?	City-wide projects can be spread thin making it difficult to show impact.

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

Priority Needs

Table 50 – Priority Needs Summary

1	Priority Need Name	Rehabilitation of existing owner-occupied units
	Priority Level	High
	Population	Extremely Low Income Low Income Moderate Large Families, Families with Children Elderly Veterans
	Geographic Areas Affected	City-Wide HUD approved NRSAs City designated Slum and Blight Areas
	Associated Goals	Safe and affordable owner-occupied housing Expand supply of owner-occupied housing
	Description	The City will use CDBG funds in the form of zero interest loans for non-elderly households and grants for elderly households leveraged with private capital to keep residents in their homes. The City also uses CDBG funds to address related emergencies in houses receiving funding through the Lead abatement programs.
	Basis for Relative Priority	Rehabilitation of owner-occupied homes was prioritized based on resident and agency surveys and public meetings, where 73% of participants identified home repair as a top need. The community feedback was supported by demographic and housing data, which shows that 90% of the city's housing stock was built before 1980, and 39% of homes have at least one notable deficiency/repair need. Construction costs have outpaced home value gains, making repairs unaffordable for many homeowners.
2	Priority Need Name	Increase in affordable rental housing options
	Priority Level	High

	Population	Extremely Low Income Low Income Moderate Large Families, Families with Children Elderly Public Housing Residents Individuals Elderly Frail Elderly
	Geographic Areas Affected	City-Wide
	Associated Goals	New construction or acquisition/rehab of affordable rental housing Help those with special needs (non-homeless) Reduce homeless citizens in the City of Detroit
	Description	Increase the availability of new, as well as the preservation of existing, single family and multi-family rental housing for low- to-moderate-income households.
	Basis for Relative Priority	Affordable rental housing is a top priority due to a shortage of low-cost options, a 15% rent increase since 2009 in some census tracts and higher in others, and a median income of \$32,498. With 57% of renters cost burdened (spending more than 30% of income on housing costs), affordability is especially limited for African American households, who earn 25% less than White households. The risk of losing affordable units to disrepair, market conversion, and limited subsidies adds to the challenge. Extremely low-income renter households are vulnerable to substandard housing issues. Survey results show 69% of respondents ranked rental housing as a high need.
3	Priority Need Name	Increased homeownership opportunities
	Priority Level	High
	Population	Extremely Low Income Low Income Moderate Large Families, Families with Children Elderly Public Housing Residents Individuals Veterans
	Geographic Areas Affected	City-Wide HUD approved NRSAs

	Associated Goals	Expand supply of homebuyer housing – financial assistance Expand supply of homebuyer housing – HOME CHDO or CDBG CBDO
	Description	The City will use CDBG and HOME funds to create affordable homeownership opportunities for low- to moderate-income households. These will be in the form of down payment and closing costs assistance to purchase existing homes and development subsidies to develop single family houses through certified HOME Community Housing Development Organizations (CHDOs) or CDBG Community Based Development Organizations (CBDOs).
	Basis for Relative Priority	The homeownership rate in the city is 47% and the median income impacts affordability as homeowners are also cost-burdened. The data on high need priority of increased homeownership opportunities was supported by a 59% response rate on surveys and public meetings.
4	Priority Need Name	Expanding economic development opportunities
	Priority Level	Low
	Population	Extremely Low Income Low Income Moderate Income Middle Income Large Families, Families with Children Elderly Public housing residents Non-housing Community Development Other
	Geographic Areas Affected	City-Wide HUD approved NRSAs
	Associated Goals	Creation or retention of jobs for LMI individuals Assistance for small businesses and microenterprises
	Description	These programs support local businesses that create jobs and provide vital goods and services that strengthen the surrounding community. These programs also enhance the appearance and historical character of individual buildings in commercial districts. Direct financial assistance to small businesses.
	Basis for Relative Priority	Surveys and public meetings showed residents and stakeholders prioritized economic development, with 52% citing job creation and 51% supporting small business assistance. With a median income of \$31,000, job growth is key to reducing poverty and boosting neighborhood resilience.

5	Priority Need Name	Increased employment training - Economic Development & Public Services
	Priority Level	High
	Population	Extremely Low Income Low Income Moderate Income Middle Income Large Families, Families with Children Elderly Public housing residents Non-housing Community Development Other
	Geographic Areas Affected	City-Wide HUD approved NRSAs
	Associated Goals	Creation or retention of jobs for LMI individuals Increased public services
	Description	The city will use public services funding to provide employment training for the increasing job market in the City's downtown and neighborhoods to build technical and soft skills to qualify for new jobs.
	Basis for Relative Priority	The prioritization of employment training was determined through residents and other stakeholder surveys, and data shows there is a need for skills to meet the workforce needs in the city. Surveys and public meetings showed residents and stakeholders prioritized economic development, with 51% supporting small business assistance
6	Priority Need Name	Increase Public Improvement & Infrastructure
	Priority Level	High

	Population	Extremely Low Income Low Income Moderate Large Families, Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	City-Wide
	Associated Goals	Sustain Infrastructure and Public Improvements CDBG Declared Disaster Recovery Grant
	Description	Improvements to and the expansion of public facilities and infrastructure within the City of Detroit
	Basis for Relative Priority	Improvements to and expansion of public facilities and infrastructure were selected as High Need with Water/Sewer Improvements (73%), Streets and sidewalks (61%), from the online surveys. The City's Master Plan of Policies, Detroit Capital Agenda, and Detroit Future City Strategic Framework identify gaps in infrastructure and capital priorities. The city assessed needs and planned the use of CDBG-DR, ARPA, and Choice Neighborhood Planning grants.
7	Priority Need Name	Increased Community and Public Facilities
	Priority Level	High

	Population	Extremely Low Income Low Income Moderate Large Families, Families with Children Elderly Public Housing Residents Individuals Families with Children Elderly Frail Elderly
	Geographic Areas Affected	City-Wide
	Associated Goals	Improved public facilities
	Description	The city will provide CDBG funding to improve public facilities in neighborhoods where at least 51% of the population are low-to- moderate -income households
	Basis for Relative Priority	The prioritization of public facility improvements was determined through an online survey. Community youth centers, childcare centers, and community centers were ranked with an average of 54% of survey respondents scoring them as high need. The City's Master Plan of Policies, and Detroit Capital Agenda identified gaps in the improvement of public facilities.
8	Priority Need Name	Increased Public Services
	Priority Level	High

	Population	Extremely Low Income Low Moderate Income Middle Income Large Families, and Families with Children Public Housing Residents Individuals Families with Children Chronic Substance Abuse Veterans Elderly and Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	City-Wide HUD approved NRSAs
	Associated Goals	Public services to low-to -moderate-income households and individuals
	Description	A variety of public services including labor, supplies, and materials eligible under 24 CFR part 570.201 (e) will be provided to residents based on a new service or an increase in an existing service up to 15% of CDBG grant. NRSAs allow the city to exceed the 15% cap on public services.
	Basis for Relative Priority	Public input from meetings and surveys prioritized services like mental health (72%), homeless support (67%), fair housing (65%), health care (58%), transportation (57%), youth services, literacy, and childcare (54%). These priorities are backed by funding, demand, and related needs from increased housing activity, such as homebuyer counseling. Data also shows Detroit has 97,000 seniors, 43% with disabilities, underscoring the need for elderly services.
9	Priority Need Name	Demolition and Clearance
	Priority Level	Low
	Population	Extremely Low Income Low Income Moderate Large Families and Families with Children Elderly Public Housing Residents Individuals Families with Children

	Geographic Areas Affected	City-Wide HUD approved NRSAs City designated Slum and Blight Areas
	Associated Goals	Blight removal and demolition
	Description	Demolition and clearing of existing housing structures within the City of Detroit
	Basis for Relative Priority	Despite 56% of survey respondents rating demolition of substandard structures as a high need, it was not prioritized for CDBG funding. Deferred demolition continues to hinder redevelopment due to blight, though other funding sources have supported these efforts.
10	Priority Need Name	Homeless Prevention
	Priority Level	High
	Population	Extremely Low Income Families and Families with Children Elderly At risk for homelessness Individuals Veterans Persons with disabilities
	Geographic Areas Affected	City-Wide
	Associated Goals	Reduce homeless citizens in City of Detroit
	Description	The City of Detroit will use CDBG and ESG funds towards meeting the needs of persons and households who are homeless or at risk of homelessness.
	Basis for Relative Priority	Homeless prevention was prioritized as a high need based on survey results showing strong support for prevention (65%) and emergency services (64%). The Detroit Continuum of Care confirmed the high priority. Agencies cited gaps in funding, transportation, and service awareness, highlighting the need for wraparound support like case management, mental health referrals, food, and crisis services.
11	Priority Need Name	Emergency Shelter
	Priority Level	High

	Population	Extremely Low Income Families & Families with Children Elderly Chronic Homelessness Individuals Veterans
	Geographic Areas Affected	City-Wide
	Associated Goals	Reduce homeless citizens in City of Detroit
	Description	The City of Detroit will use CDBG and ESG funds towards meeting the needs of persons and households for Emergency Shelter and Street Outreach to prevent homelessness..
	Basis for Relative Priority	Emergency shelter (69%) and transitional housing (51%) were prioritized as a high need based on survey results showing strong support for both but less for the latter. The Detroit Continuum of Care confirmed the high priority. Agencies cited gaps in funding, transportation, and service awareness, highlighting the need for wraparound support and services especially for youth and domestic violence survivors.
12	Priority Need Name	Rapid Re-housing
	Priority Level	High
	Population	Extremely Low-Income Families and Families with Children Elderly Chronic Homelessness Individuals Veterans
	Geographic Areas Affected	City-Wide
	Associated Goals	Reduce homeless citizens in City of Detroit
	Description	The city will provide CDBG and ESG funding for Rapid Re-housing and related activities to ensure that residents are able to move <u>out of emergency shelter and into permanent housing</u>
	Basis for Relative Priority	Need to rapidly re-house households to decrease the amount of time spent homeless. The prioritization of Rapid Rehousing as a need was determined through citizen participation in an online survey. The Detroit Continuum of Care confirmed the priority of Rapid Rehousing.
13	Priority Need Name	Street Outreach

	Priority Level	High
	Population	Extremely Low Income Families and Families with Children Elderly At risk for homelessness Individuals Veterans Persons with disabilities
	Geographic Areas Affected	City-Wide
	Associated Goals	Reduce homeless citizens in City of Detroit
	Description	The City will provide CDBG and ESG funds to conduct street outreach that focuses on directly engaging individuals and families experiencing homelessness, identifying their needs and connecting them to housing and support services.
	Basis for Relative Priority	Homeless prevention was prioritized as a high need based on survey results showing strong support for prevention (65%) and emergency services (64%). Since street outreach is a part of homeless prevention, it is considered a high priority for use of federal funding.
14	Priority Need Name	Permanent Supportive Housing
	Priority Level	High
	Population	Extremely Low Income Large Families Families and Families with Children Chronic Homelessness Individuals Veterans
	Geographic Areas Affected	City-Wide NRSA Areas
	Associated Goals	Reduce homeless citizens in City of Detroit New construction and acquisition of affordable rental housing with supportive services.
	Description	The city will provide CDBG funding for permanent supportive housing construction and related activities to ensure that households experiencing homelessness are able to end their homelessness by moving into permanent housing with the necessary supports to remain housed.

	Basis for Relative Priority	Permanent housing (72%) was prioritized as a high need based on survey results. The Detroit Continuum of Care (CoC) continues to prioritize permanent housing solutions to reduce homelessness duration and recurrence. Agencies cited gaps in permanent housing especially for youth and domestic violence survivors.
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SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
<p>Tenant Based Rental Assistance (TBRA)</p>	<p>The City of Detroit faces an urgent need to support individuals and families experiencing homelessness through flexible rental assistance options. The Market Analysis in the 2025–2029 Consolidated Plan reveals a persistent lack of affordable housing units available to the lowest-income residents, which continues to drive housing instability and homelessness. With long waitlists for Housing Choice Vouchers (Section 8) and limited shelter space, many individuals are left without viable housing options.</p> <p>Tenant-Based Rental Assistance (TBRA) for homeless persons provides a flexible, rapid response housing solution. Administered through programs like the Continuum of Care (CoC) and Emergency Solutions Grant (ESG), TBRA can quickly move households from shelters or the streets into safe, stable housing. It also allows for individualized wraparound services that support housing retention, such as case management and employment assistance. In a city with over 9,700 annual CAM contacts and chronic shortages of emergency and permanent supportive housing beds, TBRA is a necessary intervention to prevent prolonged homelessness and promote long-term stability.</p> <p>Many individuals and families experiencing homelessness in Detroit are at extreme risk of cost burden, with those transitioning from shelters or the streets often unable to afford even the most basic rental housing without assistance. According to HUD standards, a household paying more than 30% of its income on housing is considered cost-burdened; those paying more than 50% are severely cost-burdened. Among formerly homeless individuals attempting to re-enter the housing market, these thresholds are routinely exceeded due to minimal income and rising rents.</p>

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
TBRA for Non-Homeless Special Needs	<p>The Market Analysis also identifies a significant demand for TBRA among non-homeless populations with special needs, including seniors, persons with disabilities, and individuals with chronic health conditions such as HIV/AIDS or mental illness. These groups often live on fixed incomes and face discrimination and barriers in the private rental market. Although they may not meet the HUD definition of homelessness, they are at high risk for housing instability and displacement.</p> <p>TBRA for non-homeless special needs households serves as a vital bridge to maintain housing stability and support independent living in the community. It ensures these residents can afford safe and accessible housing while continuing to receive health and supportive services. The analysis further highlights that the aging population and households with mobility challenges require adaptable and affordable units, which are in limited supply. TBRA allows these vulnerable residents to remain housed and avoid entering the homelessness system, reducing strain on emergency services, and promoting equity in housing access.</p> <p>In addition, survivors of domestic violence—often not immediately classified as homeless—benefit from TBRA that provides confidential and stable housing during periods of transition and recovery.</p> <hr/> <p>Non-homeless special needs populations, such as seniors, persons with disabilities, and those with chronic health conditions, face a high prevalence of cost burden in Detroit. Many of these households subsist on fixed incomes, making them particularly vulnerable to housing instability. Data from recent housing assessments indicate that a large proportion of this group pays more than 30% — and often more than 50% — of their monthly income on rent and utilities, qualifying them as cost-burdened or severely cost-burdened under HUD definitions.</p>

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
New Unit Production	<p>The City of Detroit faces persistent challenges that justify the strategic use of funds for new unit production. A significant driver is the high rate of cost burden among renters—particularly extremely low-income households—over 80% of whom spend more than 50% of their income on housing. This severe affordability gap, combined with rising rents and stagnant incomes, underscores the urgent need for deeply affordable new housing options. Detroit’s housing stock is also among the oldest in the country, with many structures built before 1960. A large number of these homes are no longer viable for rehabilitation and have been removed from the rental market due to structural or environmental hazards. Although Detroit has a high rate of vacant properties, many are not habitable, which limits the available rental supply.</p> <p>Moreover, the city's efforts to revitalize targeted neighborhoods through strategic development make new unit construction an essential tool for both housing and economic development. Producing new affordable housing units in areas with market potential and existing infrastructure also helps to stabilize communities, attract investment, and provide housing options that align with demand across income levels.</p>
Rehabilitation	<p>Owner-occupied housing rehabilitation is equally critical in Detroit due to the widespread presence of low- to moderate-income homeowners living in aging or deteriorating housing stock. Many of these residents lack the resources for upkeep or major repairs, placing their homes—and often their generational wealth—at risk. Rehabilitation funds enable these homeowners to address critical repairs, eliminate health and safety hazards, and avoid displacement. These efforts are particularly important in neighborhoods where homeownership rates remain strong, but housing quality is in decline.</p> <p>Rehabilitation also supports the city’s broader goals of preserving naturally occurring affordable housing, reducing neighborhood blight, and improving energy efficiency. Many homes still pose environmental health risks, such as lead-based paint, and lack modern insulation or storm resilience. By investing in owner-occupied rehabilitation, Detroit can maintain the affordability of its existing housing, extend the life of older homes, and enhance community stability while improving quality of life for residents.</p> <p>The City will continue its Zero Percent Home Repair Loan Program but will assess it for any changes.</p>

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Acquisition, including preservation	<p data-bbox="456 226 1430 409">Detroit’s housing market includes a high percentage of aging housing stock, with over 80% built before 1980, much of which shows signs of deterioration. Combined with significant vacancy and disinvestment, these conditions highlight the need for preservation to maintain affordable housing and prevent further neighborhood decline.</p> <p data-bbox="456 430 1430 613">Acquiring and rehabilitating vacant units is often more cost-effective than new construction and helps retain the city’s architectural character. Preservation also ensures continued housing for cost-burdened renters—nearly 55% of whom spend over 30% of their income on housing—and supports anti-displacement and neighborhood stabilization goals.</p> <p data-bbox="456 634 1430 768">Targeted acquisition in high-vacancy areas can revitalize communities, expand affordable rental options, and align with Detroit’s broader goals for equitable redevelopment and long-term affordability.</p>

Table 51 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c) (1,2)

Introduction

The City of Detroit receives annual federal block grant funds from HUD as an entitlement participant in its Community Planning and Development programs. The anticipated expected federal resources to carry out projects and activities during the program year are from the Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME), Housing Opportunities for Person with Aids Program (HOPWA) and Emergency Solutions Grant (ESG) funds. The first-year funding for the Consolidated Plan is usually confirmed by HUD and used as a basis to estimate the available federal resources for the five-year period by multiplying the first-year allocation by five.

HUD informed the City of Detroit a letter dated May 14, 2025, of its FY 2025-2026 grant allocations of \$32,283,682 in CDBG funds, \$5,984,902.09 in HOME funds, \$2,879,131 in ESG funds, and \$3,542,718 in HOPWA funds. Based on the FY 2025-2026, the City anticipates receiving a total of 223,452,265.45 in HUD entitlement funds over the five-year planning period, including:

Program	1 Year Actual Award FY 2025-2026	5 Year Estimate FY 2025 - 2029
CDBG	\$ 32,283,682	\$161,148,410
HOME	\$5,984,902.09	\$29,924,510.45
ESG	\$2,879,131	\$14,395,655
HOPWA	\$3,542,718	\$17,713,590
Total	\$44,690,433	\$223,452,165.45

The City adjusts goals, activities, and allocations in each Annual Action Plan to reflect actual funding. For FY 2025–2026, estimated program income is \$1.4m for CDBG and \$4.2m for HOME.

Leveraged and supplemental resources will also vary depending on project needs, financing structures, and market conditions throughout the Consolidated Plan period.

All entitlement grants and program income funds, as applicable, will be allocated to meet the housing, homeless, public service and community development needs and goals identified in the Consolidated Plan. The City of Detroit plans to use these resources for the following eligible activities:

Eligible CDBG activities include Property acquisition, owner-occupied home repair, affordable rental housing, downpayment, blight removal, neighborhood redevelopment, public service, homelessness prevention, public services, public facility rehabilitation and infrastructure, and staffing costs

Eligible HOME activities include New construction and acquisition/rehabilitation of multifamily and single

rental housing, new construction and acquisition/rehabilitation of homebuyer housing, homebuyer down payment and closing costs assistance, and tenant based rental assistance.

Eligible HOPWA activities include permanent and transitional housing, supportive services, and information/referral services

Eligible ESG activities include rapid re-housing, transitional housing, financial assistance, overnight shelter, rental assistance and outreach, permanent housing.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services Historic Preservation	32,283,682	0	1,400,000	33,683,682	129,134,728	The CDBG funds will be used to benefit low-and-moderate income persons through various social and economic programs, assisting with housing needs and eliminating slums and blight in targeted areas. The funds will assist in restoring and restructuring distressed areas while improving population growth throughout the city. Also, funds may be designated to perform relocation activities

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	5,984,902.09	0	4,200,000	10,184,902.09	23,939,608.36	HOME funds will be used to provide affordable housing including multifamily, rental, new construction, rehabilitation, and homebuyer activities to families whose household income is at 80% of the Area Median Income or less. Assistance will be provided in the form of grants and/or loans to for-profit and non-profit developers as gap financing. HOME funds will be leveraged with private and public funding sources to support the development of single and multifamily units through Low Income Tax Credits, equity from Federal Historic Tax Credits, developer equity, and from other banks and lending programs.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	2,879,131	0		2,879,131	11,516,524	The HOPWA funds will be used to serve homeless and non-homeless persons who meet income guidelines and are infected/and or affected by HIV/AIDS through Tenant Based Rental Assistance (TBRA) and Community Residential Programs while providing information and supportive services.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	3,542,718	0		3,542,718	14,170,872	ESG funds will provide a 1 to 1 match with the CDBG Program. Funds will be used for Emergency Shelters, Warming Centers, Homeless Prevention, Rapid Re-Housing and Street Outreach with the primary goal of eliminating homelessness

Table 52 - Anticipated Resources

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

Federal grant funding alone is insufficient to meet the housing and community development needs of Detroit’s low- and moderate-income households. To address this gap, the City has actively pursued public and private partnerships to leverage federal funds with additional private, state, and local resources. This collaborative funding approach increases the scope and effectiveness of eligible activities, ensuring broader community benefit and greater return on investment.

Where required, the City will meet matching requirements through a combination of local funds and in-kind contributions. These may include general fund allocations, tax increment financing, donated land, waived fees, or staff time. The initiatives and funding sources outlined below demonstrate how these efforts support the City’s housing and community development goals during the five-year Consolidated Plan period.

- **Historic Tax Credits**

The federal Historic Rehabilitation Tax Credit (HTC) offers a 20% credit for qualified expenses to restore historic buildings. Before the 2017 tax reform, a 10% credit was also available for pre-1936 non-historic buildings. These incentives promote private investment in preserving and reusing historic structures.

- **The Michigan Low-Income Housing Tax Credit Program (LIHTC)**

The Low-Income Housing Tax Credit (LIHTC) Program, created by the 1986 Tax Reform Act, supports the development and preservation of affordable rental housing. Administered by MSHDA, it offers investors annual tax credits over 10 years to attract private capital. The City funds projects that receive MSHDA-awarded LIHTCs, including HOME-assisted developments with 9% competitive or 4% non-competitive credits.

- **Detroit Housing for the Future Fund**

The Detroit Housing for the Future Fund is a joint initiative between the City of Detroit and the Local Initiatives Support Corporation (LISC) to support affordable housing development and preservation. Funded by corporate and philanthropic grants and loans, it offers locally tailored financing tools such as predevelopment grants, low-interest senior and subordinate loans, and preferred equity. The initial \$58 million will be fully deployed by 2025, and additional capital is being raised to extend the fund into 2026.

- **DEGC & EDC**

The DEGC works closely with the City of Detroit and other partners to support existing businesses and to bring new companies and investments to the City of Detroit. The professionals who work for DEGC act as staff to several public authorities, whose board members are typically appointed by the Mayor and approved by Detroit City Council, and each public authority has a distinct responsibility based upon state enabling legislation. DEGC also works directly for the City of Detroit under contract and manages economic development efforts funded by private and foundation contributions, grants, and contracts.

- **Choice Neighborhoods Implementation & Planning Grants**

In May 2021, the City of Detroit was awarded a \$30 million Choice Neighborhoods Implementation (CNI) Grant to support a Transformation Plan focused on revitalizing target neighborhoods. In response to rising construction and financing costs, the City secured an additional \$5 million in 2023. By the end of the grant term in September 2028, the City will facilitate the development of new affordable and mixed-income housing and implement community improvements that support neighborhood revitalization.

The City has also expanded supportive services for residents in the target housing site, focusing on health, education, and economic self-sufficiency. Career coaching, resident engagement, and outcome evaluation efforts are underway to ensure residents benefit from the investments made through the grant.

Separately, in 2024, the City and Detroit Housing Commission (DHC) were awarded a \$500,000 Choice Neighborhoods Planning Grant to develop a comprehensive Transformation Plan for another public housing site and surrounding neighborhood. Additional funding has been leveraged to support planning, staffing, and community engagement activities. The final Transformation Plan, due by September 2026, will outline strategies for improving housing, increasing mixed-income options, enhancing neighborhood conditions, and connecting residents to services and opportunities.

- **Pathways to Removing Obstacles to Housing grant (PRO Housing)**

The City of Detroit was awarded a \$4.2 million Pathways to Removing Obstacles to Housing grant (PRO Housing) from HUD to advance policies and programs that accelerate the development and preservation of affordable housing. These funds will specifically be used to update the City's zoning code, develop a pre-permitted pattern home program, launch a small project rehabilitation program, and launch a pre-development program to support multifamily housing development in Detroit neighborhoods.

- **Section 108 Loan**

Aligned with its goal to create and preserve more affordable housing, the City has applied for \$75 million in Section 108 Loan Pool Authority to finance affordable housing projects. Eligible uses include acquisition, rehabilitation, and soft costs under CDBG and Section 108 guidelines. All loans will be secured with property or other collateral to avoid using CDBG funds for repayment. **How would Detroit's Section 108 program be designed?**

- Loans are designed to work for affordable and mixed-income housing
- The City will only loan funds to projects that have the ability to repay the loans, to avoid relying on CDBG to repay HUD. This will be accomplished by:
 - Strong underwriting standards
 - Review by multiple internal/external stakeholders
 - Multiple layers of collateral
 - Shorter term loans (< 20 yr max)
- If approved, the loan pool would open in 2026
- Developers could apply for one of four low-interest loan products

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

The City of Detroit owns public libraries, community parks and recreation centers located within the City which may be used for public service activities funded under the various HUD programs.

The City of Detroit has a land bank authority that is responsible for returning the city's many blighted and vacant properties to productive and valuable use. The land bank maintains the City's publicly owned parcels and acquires additional foreclosed/abandoned property and vacant lots. The City then addresses these properties through demolition, rehabilitation, and disposition to help stabilize neighborhood decline. For eligible properties, the land bank authority utilizes a variety of sales programs to offer homes to residents, such as the Community Partner Program, Auctions, Own-It-Now, Rehabbed & Ready and the Residential Side Lot program. Additionally, the City has some select land parcels, owned by the City of Detroit, that will be sold for new housing construction projects.

Since 2015, several large philanthropic organizations, including The Bank of America Charitable Foundation, The Erb Family Foundation, and The Kresge Foundation have awarded over \$3.7 million in much needed funding to Detroit Future City (DFC) in support of its efforts to promote the advancement of land use and sustainability, and community and economic development, including its Working With Lots program. This program provides technical assistance and grants to community-based organizations working to sustainably repurpose vacant land in Detroit residential neighborhoods. Since 2016, DFC has awarded more than \$330,000 to community groups, faith-based institutions, non-profits, and businesses to install one of 38 lot designs to activate community spaces, address stormwater concerns, and create more attractive neighborhoods. Adaptive reuse projects through this program make use of DFC vacant land transformation designs published in the [DFC Field Guide to Working With Vacant Lots](#).

SP-40 Institutional Delivery Structure – 91.215(k)

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Planning & Development Department (P&DD)	Dept and Agencies	Historic designation advisory, historic review clearances, planning studies, site plan review, city master plan, zoning district boundaries approvals, and development plans.	Jurisdiction
Detroit Building Authority (DBA)	Dept and Agencies	Demolition of residential and commercial building and elimination of blight within the 7 districts in Detroit.	Jurisdiction
Detroit Land Bank Authority (DLBA)	Dept and Agencies	Demolition of residential and commercial building and elimination of blight within the 7 districts in Detroit.	Jurisdiction

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Department of Neighborhoods (DON)	Dept and Agencies	Help residents form block clubs and community associations; drive community engagement on neighborhood planning projects and other initiatives; resolve citizens' complaints; and educate residents on a broad range of City programs and policies.	Jurisdiction
Detroit Health Department	Dept and Agencies	Provide programs/services. Lead Prevention Program, Lead Safe Detroit, Lead Abatement Grant, Lead Education, Healthy Homes Detroit Program, The Housing Opportunities for Persons with AIDS (HOPWA) grant programs; and Tenant Based Rental Assistance (TBRA), Community Residential/Transitional, and Housing Supportive Services.	Jurisdiction
Building Safety Engineering and Environmental Department (BSEED)	Dept and Agencies	Lead hazard inspection for a rental property; rental housing compliance	Jurisdiction
Detroit Department of Transportation (DDOT)	Dept and Agencies	Public transportation operator of city bus service in Detroit	Jurisdiction
Detroit Housing Commission (DHC).	Public Housing Authority (PHA)	Public Housing: The DHC manages the following program: Section 8 - Low-income public housing.	Jurisdiction
Wayne Metropolitan Community Action Agency (WMCAA)	Dept and Agency	Homeless Programs and services: WMCAA provide essential services, and community resources to low- and moderate-income individuals and families throughout all of Wayne County. The services include the following: Housing placement, moving, utility assistance, health care, weatherization, transportation, and food	Jurisdiction
Detroit Economic Growth Corp	Redevelopment Authority	The DEGC serves as the economic driver for development initiatives for the City. In addition to this, the DEGC's role through the Motor City Match program is to create jobs by giving technical assistance to entrepreneurs and assist with business expansion within the City.	Jurisdiction

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Detroit Employment Solutions Corporation (DESC)	Dept and Agencies	DESC is one of the State's Michigan Works! Association and is the lead for the City's Detroit at Work, which provides job placement, training, and career advisement.	Jurisdiction
Local Initiatives Support Corporation (LISC)	Private Industry	Zero Percent Home Repair Loan (homeowners' rehab program) through a subrecipient agreement. We invest in affordable housing, growing businesses, safer streets, high-quality education, and programs that connect people with financial opportunity.	Jurisdiction
Homeless Action Network of Detroit (HAND)	Continuum of Care	Homelessness, Non-homeless special needs, Public Housing, Rental, public services	Jurisdiction
DAAA - Detroit Area of Aging Agency	Non-profit organizations	public services	Jurisdiction
Detroit Housing Coalition (DHC)	Non-profit organizations	public services, homelessness	Jurisdiction
Fair Housing Center of Metropolitan Detroit	Non-profit organizations	public services	Jurisdiction

Table 53 - Institutional Delivery Structure

Assessment of Strengths and Gaps in the Institutional Delivery System

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

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

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

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

A partnership-based structure requires communication, information sharing, planning, and in many instances joint implementation and evaluation. These are all strengths in the partnership structure. The

partnership structure also uses the expertise of contractors, subrecipients and others with the specialized knowledge needed to carry out functions and projects. The process and environment are controlled through contracts with subrecipients, agreements with other City departments and entities as well as other governmental agencies.

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

In the 2025-26 fiscal year, HOME, CDBG, CDBG-CV, and HOME-ARP funds will be targeted to strategic areas in the City through a Notice of Funding Availability (NOFA) process. These funds will be prioritized to create or maintain affordability for projects in areas with lower vacancies, strong real estate markets and areas located near local employment districts or transit. New construction will be limited to areas where there is clear demand and long-term housing viability.

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

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

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

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

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	X
Mortgage Assistance	X	X	X
Rental Assistance	X	X	X
Utilities Assistance	X	X	X

Street Outreach Services			
Law Enforcement			
Mobile Clinics	X	X	X
Other Street Outreach Services	X	X	X
Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X	X	
Employment and Employment Training	X	X	
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X
Other			
Other			

Table - Homeless Prevention Services Summary

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

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

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

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

The Continuum of Care has developed written performance standards and evaluation techniques for the use of ESG and other funds as well as a Performance and Evaluation Committee which oversees

implementation and a collaborative monitoring process for all recipients of homeless funding. HAND assists HRD with the CDBG and ESG Request for Proposals process to find high-capacity providers which is often challenging as well as ensuring that the allocation and use of funds meets the needs of persons with special needs and those experiencing homelessness.

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

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

The Administration, through HRD, presents a proposed CDBG budget for City Council review. Also, the City Planning Commission (CPC) staff, working with the Citizens Review Committee and the CPC develop recommendations for Council consideration. While HRD is tasked with planning and program implementation, the City Council makes the final funding decisions. In consultation with HUD, HRD works more closely with the CPC and the City Council to establish a more strategic and collaborative process for allocating limited resources in the budget cycle.

The City of Detroit has continued its relationship with the Detroit Economic Growth Corporation (DEGC) to reduce redundant function and increase collaboration for real estate and economic development activities. The City has also established various task forces (such as the Housing Task Force and the Detroit Lead Partnership) and local collaborative meetings between housing stakeholders, social service stakeholders and citizens to maintain communication and coordination. The Mayor's office has also established a faith-based liaison as a point of contact with the faith-based community.

The Administration has also evaluated elements of the HRD organizational chart to identify opportunities to enhance efficiency, improve effectiveness, and clarify responsibilities to strengthen accountability. For example, the City enhanced its Request For Proposal (RFP) system in Oracle to make it easier for community organizations to apply online. Additionally, beginning next year, we will implement the Neighborly software platform to support the RFP and Notice of Funding Availability (NOFA) processes, including intake, application submission, award management, performance tracking and reporting.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Reduce homeless citizens in City of Detroit	2025	2029	Homeless	City-Wide	Increase in affordable rental housing option Homeless Prevention Rental Assistance Homeless Street Outreach Emergency Shelter and Transitional Housing Rapid Re-housing	CDBG: \$ <u>11,977,585</u> ESG: \$ <u>14,395,655</u> Coc: \$ <u>200,915,485</u>	Tenant-based rental assistance / Rapid Rehousing: <u>7,775</u> Households Assisted All "Extremely Low" income benefit Homeless Person Overnight Shelter: <u>20,040</u> Persons Assisted All "Extremely Low" income benefit Overnight/Emergency Shelter/Transitional Housing Beds added: <u>0</u> Beds All "Extremely Low" income benefit Homelessness Prevention: <u>370</u> Persons Assisted All "Extremely Low" income benefit Homeless Outreach: <u>8,230</u> Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Rehabilitation of Existing Housing Units	2025	2029	Affordable Housing rehabilitation of existing housing units	City-Wide NRSA	Rental Assistance Production of new housing units Rehabilitation of existing units Acquisition Rehabilitation of Existing Units incl 0% loan and Sr. Home Repair programs and Lead Remediation Development of Permanent Supportive Housing	HOME: <u>\$29,924,510.45</u> CDBG: <u>\$18,350,350</u> CDBG: <u>\$19,785,950</u> CDBG: <u>\$7,500,000</u>	Rental units constructed: <u>425</u> Household Housing units <u>100%</u> low/mod Rental Units rehabilitated: <u>400</u> Household Housing Unit <u>20%</u> extremely low; <u>40%</u> low; <u>35%</u> low/mod; <u>5%</u> middle Acquisition of existing units: <u>TBD</u> Household Housing Units Permanent Supportive Housing units constructed: <u>75</u> Household Housing Units (see above income %) Homeowner Housing Rehabilitated: Household Housing <u>1,000</u> Units 55% extremely low; 30% low; 10% low/mod; 5% middle income Lead Remediation: <u>750</u> Household Housing Units <u>50%</u> of extremely low; <u>30%</u> of low; <u>20%</u> of low/mod; <u>0%</u> middle income

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Homeownership Program	2025	2029	Affordable Housing	City-Wide NRSA	Down Payment Assistance	CDBG: <u>\$10,800,00</u>	Loans Provided: <u>325</u> 20% low; 75% low/mod; 5% middle income
4	Public Services Activities for Citizens of Detroit	2025	2029	Public Service Summer Youth Employment	City-Wide NRSA	Public Services Activities Job/Job Training	CDBG: <u>\$12,235,175</u> CDBG: <u>\$ 7,500,000</u>	Public Service activities: <u>844,065</u> Persons assisted <u>2,500</u> Youth assisted 20% low; 75% low/mod; 5% middle income
5	Econ Dev (Creation/Retainage of Jobs/Small Businesses)	2025	2029	Non-Housing Community Development	City-Wide NRSA Areas	Economic Development Jobs/Small Business	CDBG: \$ <u>__0__</u>	Businesses assisted: <u>__TBD__</u> Jobs created and/or retained
6	Sustain Infrastructure and Public Improvements	2025	2029	Non-Housing Community Development	City-Wide	Public Improvement & Infrastructure	CDBG: <u>\$ 2,500,000</u>	Other: <u>10,000</u> residents of LMA served
7	Public Facilities and Improvements- Public facilities rehabilitation	2025	2029	Non-Housing Community Development	City-Wide	Public Facilities	CDBG: <u>\$ 5,000,000</u>	Other: <u>14</u> Public Facilities <u>56,434</u> residents of LMA served <u>56,434</u> community benefit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Blight removal and demolition	2025	2029	Demolition	City-Wide	Demolition Clearing Acquisition of Existing Units	CDBG: \$TBD_____	Buildings Demolished: <u>TBD</u> Structures (includes schools, commercial and residential properties)
9	Section 108 Repayment	2025	2029	Non-Housing Community Development	City-Wide	Economic Development	CDBG: \$TBD_____	Businesses assisted: <u>TBD</u> Other
10	Help those with special needs (non-homeless)	2025	2029	Non-Homeless Special Needs	City-Wide	Public Services Rental assistance	HOPWA: \$17,713,590	HIV/AIDS Housing Operations <u>275</u> Tenant-based rental assistance: <u>1,200</u> Household Housing Units
11	Other: Relocation	2025	2029	Non-Housing Community Development	City-Wide	Relocation of displaced residents	CDBG: \$ <u>TBD</u> _____	Number of individuals or households <u>TBD</u> Persons or Households Assisted
12	Other: Residential Historic Preservation	2025	2029	Housing Rehabilitation	City-Wide	Rehabilitation of Existing Units	CDBG: \$0	Number of individuals or households <u>TBD</u> Persons or Households Assisted
13	Other: Provide interim assistance to address emergencies	2025	2029	Non-Housing Community Development	City-Wide		CDBG: \$0	Number of individuals or households <u>TBD</u> Persons or Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
14	CDBG Planning and Administration	2025	2029	Affordable Housing		CDBG Planning and Administration	CDBG: \$32,283,680	Other
15	CDBG Housing Rehabilitation Activity Delivery Cost	2025	2029	Affordable Housing	City-Wide	Rehabilitation of existing owner-occupied units	CDBG: \$27,863,240	Other

Table xx – Goals Summary

Goal Descriptions

1	Goal Name	Reduce homeless citizens in City of Detroit
	Goal Description	Homeless outreach, emergency shelter, transitional housing, and homeless prevention, and based rental assistance.
2	Goal Name	Rehabilitation of Existing Housing Units
	Goal Description	Affordable Housing units; rehabilitation of existing units, rental assistance, production of new units. Rehabilitation of existing units, rapid re-housing. Zero interest loan program, SEHR, Lead, permanent supportive housing
3	Goal Name	Homeownership Program
	Goal Description	Down Payment Assistance and increased homeownership opportunities
4	Goal Name	Public Services Activities for Citizens of Detroit
	Goal Description	Public services activities to benefit Citizens of City of Detroit including summer youth employment
5	Goal Name	Econ Dev (Creation of Jobs/Small Businesses)
	Goal Description	Small businesses help and retain and create jobs, provide goods and services to low-income neighborhoods. Small business assistance
6	Goal Name	Sustain Infrastructure and Public Improvements
	Goal Description	Public Improvement & Infrastructure such as infrastructure
7	Goal Name	Public Facilities and Improvements
	Goal Description	Public facilities rehabilitation to benefit the citizens of the City of Detroit.
8	Goal Name	Blight removal and demolition
	Goal Description	Blight removal within the City of Detroit. Demolition of abandoned and dangerous structures. Funding will focus on commercial structures and residential structures.
9	Goal Name	Section 108 Repayment
	Goal Description	Set-aside repayment guarantee for Section 108 loans on development projects
10	Goal Name	Help those with special needs (non-homeless)
	Goal Description	Help those with special needs through housing operations and tenant based rental assistance for persons with HIV/AIDS
11	Goal Name	Relocation
	Goal Description	Relocation of displaced residents
12	Goal Name	Residential Historic Preservation
	Goal Description	Rehabilitation of existing historical residential units
13	Goal Name	Provide interim assistance to address emergency conditions
	Goal Description	The City will provide funding for interim assistance to address emergency conditions that threaten public health and safety or to stop physical deterioration when immediate action is necessary
14	Goal Name	CDBG planning and administration of CDBG program activities
	Goal Description	Planning, implementation, monitoring, and reporting of CDBG funded activities
15	Goal Name	CDBG Housing Rehabilitation Activity Delivery
	Goal Description	Staff and other costs of delivering CDBG-funded rehab as a part of that cost

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

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

Not applicable. The Detroit Housing Commission (DHC) is not currently under a Section 504 Voluntary Compliance Agreement, and therefore no additional accessible unit targets are mandated under such an agreement at this time.

Activities to Increase Resident Involvement in management and participation in homeownership

Resident Engagement and Advisory Structures

The Detroit Housing Commission (DHC) facilitates resident involvement in its decision-making processes. In compliance with Section 511 of the U.S. Housing Act and 24 CFR Part 903, DHC established a Resident Advisory Board (RAB) comprising representatives from all sixteen DHC-managed public housing communities. The RAB plays a pivotal role in helping the DHC with key activities, including:

- Annual and Five-Year Public Housing Agency (PHA) Plans
- Capital improvement strategies
- New development projects
- Policy revisions for Public Housing and Housing Choice Voucher programs

Additionally, Resident Councils are active in 11 of the 16 public housing communities, serving as grassroots platforms for community engagement, two-way communication, and information sharing between residents and DHC. These councils provide essential input into strategic planning and program modifications.

Homeownership Preparation and Support Programs

For those with an interest, DHC facilitates the transition of its residents from renting to homeownership. Through partnerships with HUD-certified nonprofit agencies, DHC offers a continuum of services, including:

- Credit repair and financial literacy education
- Basic home maintenance training
- Access to down payment and financial assistance programs

In addition to the above, the Housing Choice Voucher (HCV) Homeownership Program, allows eligible voucher holders to apply their vouchers toward mortgage payments instead of rent. To qualify, participants must meet DHC's income requirements, have at least one year of full-time employment,

possess a minimum of \$1,000 in savings, and be able to secure a mortgage through a conventional lender. For elderly and disabled residents, the employment requirement is waived. [DHCMI](#)

Employment as a Pathway to Homeownership

Recognizing the critical link between employment and self-sufficiency, DHC's Resident Services Department (RSD) plays a central role in enhancing economic mobility among residents. Through programs such as:

- Resident Opportunities and Self-Sufficiency (ROSS)
- Family Self-Sufficiency (FSS)
- Comprehensive Self-Sufficiency Program (CSSP)

The RSD connects public housing residents to job training, career development, and placement services with local employers. These initiatives equip residents with the skills and financial tools necessary to progress toward homeownership.

Strategic Goals for 2025–2029

Over the five-year term of the Consolidated Plan, DHC aims to:

- Expand its network of service providers to enhance resident services and economic advancement opportunities.
- Secure additional funding sources to support and grow resident programs.
- Increase participation in homeownership programs among eligible residents.
- Strengthen resident engagement through the continued support and development of Resident Councils and the Resident Advisory Board.

Through these concerted efforts, DHC demonstrates its commitment to empowering residents, promoting self-sufficiency, and facilitating pathways to homeownership.

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

No, the Detroit Housing Commission is **not designated as a troubled agency** under 24 CFR Part 902

Plan to remove the ‘troubled’ designation

N/A

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

Detroit continues to face a number of challenges that affect the availability and development of affordable housing. This section outlines the barriers to affordable housing identified in the City of Detroit's 2022 Master Plan which is being updated. The Housing Market Study of the Consolidated Plan also provided additional analysis. These challenges stem from a mix of financial constraints, physical infrastructure limitations, and regulatory complexities. Understanding these barriers helps the City design effective strategies to support housing that meets the needs of residents across different income levels.

One of the key barriers is the complex and fragmented financing structure required to build and maintain affordable housing. Projects often rely on a combination of public, private, and philanthropic resources, which increases administrative complexity and can slow development timelines. There are also insufficient private sector financial resources geared to affordable housing and decreased CDBG and HOME and other federal funding for housing.

Another challenge lies in the condition and availability of rental housing. Over the years, the supply has been affected by public housing demolition, aging infrastructure, and limited investment. Tenant-landlord disputes and limited voucher availability further exacerbate rental instability.

Land use and zoning present additional complications. In many neighborhoods, residential areas are situated near industrial zones, which leads to concerns about noise, pollution, and traffic. There are also policies that promote urban sprawl. Crime or perceived crime in some neighborhoods are a deterrent to investments in those areas.

Certain populations—such as seniors, individuals with disabilities, and those experiencing homelessness—often need housing that offers services or accommodations tailored to their situations.

Access to homeownership is another area where barriers exist. Historically, some lending practices have made it more difficult for lower-income households to purchase and maintain homes. Predatory lending practices also disproportionality impact low and very low income households.

Finally, in some areas, affordable housing is located far from important community resources such as public transportation, schools, healthcare, and parks. This lack of nearby amenities can undermine the long-term viability of housing. Higher home insurance rates in certain neighborhoods negatively impacts affordable housing.

Strategies to Remove or Ameliorate Barriers

1. Streamlined Financing & Developer Support

To address the fragmented and complex structure of affordable housing financing, the City works to simplify the financing process and provide targeted support to developers, including technical assistance and financial incentives.

2. Investment in Rental Housing

To respond to rental disinvestment, the City partners with landlords and housing agencies to rehabilitate existing properties and improve the quality and stability of rental housing for residents. CDBG and HOME funds are leveraged with state, county, and private sector funding to invest in rental housing.

3. Zoning Reform & Industrial Buffering

The City updates land use rules to minimize conflicts between housing and industrial activity, including designated routes for heavy vehicle traffic and buffer zones.

4. Supportive and Senior Housing Initiatives

The City of Detroit collaborates with organizations to provide more options and expand opportunities for transitional and long-term housing that includes services for seniors and others with specific needs.

5. Fair Lending and Homebuyer Assistance

The City encourages lending practices that give households a better chance to purchase a home and offers programs to support first-time homebuyers.

6. Coordinated Neighborhood Development

Housing efforts are planned alongside improvements to transportation, education, business, and public spaces to strengthen communities.

7. Use of Federal and Local Funds

The above efforts are supported through the strategic use of federal, state, and local funds—including CDBG, HOME, ESG, and HOPWA programs—which enable the City to invest in new housing construction, the rehabilitation of existing units, and services that help residents maintain stable housing. Together, these strategies aim to build stronger neighborhoods and provide more residents with the opportunity to live in safe, stable housing.

SP-60 Homelessness Strategy – 91.215(d)

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

The Detroit Continuum of Care (CoC) utilizes the Coordinated Assessment Model (CAM) to streamline access to housing and services for individuals experiencing homelessness in Detroit, Hamtramck, and Highland Park. CAM assesses all clients seeking services with standardized assessment tools and ensures coordinated entry into shelter programs and prioritization of clients for housing and services on the basis of their assessment score. CAM serves as a centralized entry point, coordinating with service providers to assess and address housing needs. Individuals can access CAM through various means, including a dedicated call center and in-person visits to access points. In 2024, CAM recorded over 9,700 combined contacts, averaging 108 per day, demonstrating its critical role in connecting individuals to appropriate resources.

Households experiencing homelessness can either call the CAM call center or go to one of three in person access sites. Households experiencing homelessness can access in-person CAM services at the NOAH Project, 23 E. Adams, Detroit MI 48226 and Cass Community Social Services, 11850 Woodrow Wilson St. Veterans experiencing homelessness can go to the Detroit Veterans Administration, 4646 John R, Blue Tower, 7th Floor, Room A7175 Detroit, MI 48201. In addition to the in-person access points, households can call 1-866-313-2520 to be connected with CAM. This call center combines multiple funding sources in order to offer a plethora of housing related resources to the community in addition to CAM.

CAM uses standardized assessment tools, such as the Service Prioritization Decision Assistance Tool (SPDAT), to evaluate the needs of individuals and families, ensuring equitable and efficient referrals to suitable housing interventions. These assessments are conducted both in emergency shelters and through street outreach efforts, ensuring comprehensive coverage of both sheltered and unsheltered populations. Based on assessment results and availability of resources, individuals and families are referred to appropriate service providers within the CoC for interventions like Rapid Rehousing Assistance (RRH) or Permanent Supportive Housing Assistance (PSH).

Addressing the emergency and transitional housing needs of homeless persons

The City of Detroit, in collaboration with the Detroit Continuum of Care (CoC), has significantly expanded its emergency shelter services to better address the needs of individuals experiencing homelessness.

Emergency Shelters: The number of emergency shelter beds increased from 924 in the year 2023 to 1,202 in 2024. These beds, combined with drop-in centers and warming centers beds further detailed below, bring the total to over 1,400 beds, the highest capacity the city has ever had.

Drop-In Centers: In December 2024, two new Immediate Shelter drop-in centers opened, providing 110 beds that accept all unsheltered individuals without requiring prior assessment through the Coordinated Assessment Model (CAM). Cass Community Social Services and Detroit Rescue Mission Ministries operate these centers.

Seasonal Warming Centers: During colder months, the city activates additional warming centers to provide refuge for individuals experiencing homelessness. These centers offer overnight shelter, meals, showers, and housing assistance services. These beds come online in November and ramp down in March each year.

All these facilities are integrated into the CAM system, ensuring coordinated access and efficient utilization of available resources.

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

The Detroit Continuum of Care (CoC) continues to prioritize permanent housing solutions to reduce homelessness duration and recurrence.

Rapid Re-Housing (RRH): According to the 2024 Homeless Inventory Count (HIC) the CoC, including both CoC and ESG funded programs, provided 561 RRH beds in 2024, offering short- to medium-term rental assistance and supportive services to quickly transition individuals and families into permanent housing.

Permanent Supportive Housing (PSH): According to the 2024 Homeless Inventory Count (HIC) the CoC provided 3,115 PSH beds in 2024, offering long-term rental assistance with supportive services for individuals with disabilities and those experiencing chronic homelessness.

These programs are prioritized through Coordinated Assessment Model (CAM) assessments, ensuring that resources are allocated based on individual needs and vulnerabilities.

Veterans: The CoC collaborates with the Department of Veterans Affairs to provide targeted programs for veterans:

- **Supportive Services for Veteran Families (SSVF):** Offers both RRH and homelessness prevention assistance.
- **HUD-Veterans Affairs Supportive Housing (HUD-VASH):** Provides permanent housing subsidies and case management services.
- **Grant and Per Diem (GPD) Programs:** Offer transitional housing and supportive services to help veterans achieve residential stability.

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

- A portion of the emergency shelter and transitional housing beds in Detroit are specifically targeted to families with children.

- The Detroit CoC reallocated a CoC-funded Supportive Services Only (SSO) grant to a new Rapid Re-Housing program for families, providing \$880,000 in funding for 60 units of RRH for homeless families. The project began operations in calendar year 2015 and has been fully operational since.
- Emergency Solutions Grant (ESG) and Community Development Block Grant (CDBG) funding are also used to support RRH efforts in Detroit.
- Families with children are also served through the City's existing prevention assistance programs.

Unaccompanied Youth:

In July 2021, Detroit applied for a grant opportunity known as the Youth Homelessness Demonstration Program (YHDP). YHDP is a federal funding opportunity made available to communities through the Department of Housing and Urban Development (HUD). The ultimate goal of the YHDP is to reduce youth homelessness.

In 2022, a community planning process was carried out, culminating in the completion of Detroit's Coordinated Community Plan (CCP) to end youth homelessness. The CCP acts as a guiding and organizing document in the youth space. The hope is that the awarded communities will build momentum around youth work and then share that experience to help mobilize communities around the country towards the same end – already in Michigan, we have seen several other communities apply for YHDP and look to Detroit for guidance.

The population served by YHDP is youth experiencing homelessness up to age 24. In April of 2023, Detroit's Youth Homelessness Demonstration Program (YHDP) grant period began. The following project types were funded and launched: Permanent Supportive Housing (PSH), Joint Component Transitional Housing Rapid Rehousing (TH-RRH), Rapid Rehousing (RRH) portion of the joint component program, and Crisis Mental Health. This initial round of YHDP funding goes through March of 2025. Three organizations that best represented our collective vision and had extensive experience serving youth are now implementing these new projects. The recipients are Ruth Ellis Center, Permanent Supportive Housing (PSH); MCHS Family of Services and Detroit Phoenix Center, Joint Component Transitional Housing Rapid Rehousing (TH-RRH); and MCHS Family of Services, Crisis Mental Health.

Additionally, improvements have been made to the CAM system for young people, with the addition of YHDP-funded youth-specific navigation services. This team, led by f Community and Home Supports (CHS), has helped our community to better meet youth where they are and get them connected to appropriate and necessary services. They also facilitate Detroit's new Youth Case Conferencing space, where providers can share resources and consult on client cases in real-time. Through these efforts, we are confident that we are improving outcomes for young people in our community. Detroit looks forward to evaluating these new projects to get a more complete picture of the impact they are having.

With the YHDP-funded projects off the ground, Detroit has been able to shift focus to the CCP and system-level work to address youth homelessness in our community. This work is being led by the CoC's Committee on Youth Homelessness (CYH). Seated committee members include a representative from the City of Detroit and other stakeholders in the youth space from MDHHS, the education system, the juvenile justice system, the Youth Action Board, the CoC Board, youth service agencies, and more. The CYH is

working to make system improvements for youth and has begun exploring the possibility of Direct Cash Transfer programming through both private and public funding channels.

In addition to YHDP-funded projects discussed above, the following funded resources will be available to youth in Detroit:

- There will be at least one emergency shelter specifically for youth.
- There will be an organization that specifically provides drop-in services, counseling, and housing services to homeless youth who identify as LGBTQ.
- There will be two funded project-based Permanent Supportive Housing programs that are open to all but targeted to youth.

These efforts reflect the CoC's commitment to providing comprehensive support to diverse populations experiencing homelessness in Detroit. **Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education, or youth needs**

Preventing Homelessness in Detroit: A Coordinated Approach

The Detroit Continuum of Care (CoC) continues to prioritize permanent housing solutions to reduce homelessness duration and recurrence.

Rapid Re-Housing (RRH): According to the 2024 Homeless Inventory Count (HIC) the CoC, including both CoC and ESG funded programs, provided 561 RRH beds in 2024, offering short- to medium-term rental assistance and supportive services to quickly transition individuals and families into permanent housing.

Permanent Supportive Housing (PSH): According to the 2024 Homeless Inventory Count (HIC) the CoC provided 3,115 PSH beds in 2024, offering long-term rental assistance with supportive services for individuals with disabilities and those experiencing chronic homelessness.

These programs are prioritized through Coordinated Assessment Model (CAM) assessments, ensuring that resources are allocated based on individual needs and vulnerabilities.

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- **Supportive Services for Veteran Families (SSVF):** Offers both RRH and homelessness prevention assistance.
- **HUD-Veterans Affairs Supportive Housing (HUD-VASH):** Provides permanent housing subsidies and case management services.
- **Grant and Per Diem (GPD) Programs:** Offer transitional housing and supportive services to help veterans achieve residential stability.

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- A portion of the emergency shelter and transitional housing beds in Detroit are specifically targeted to families with children.
- The Detroit CoC reallocated a CoC-funded Supportive Services Only (SSO) grant to a new Rapid Re-Housing program for families, providing \$880,000 in funding for 60 units of RRH for homeless families. The project began operations in calendar year 2015 and has been fully operational since.
- Emergency Solutions Grant (ESG) and Community Development Block Grant (CDBG) funding are also used to support RRH efforts in Detroit.
- Families with children are also served through the City's existing prevention assistance programs.

Unaccompanied Youth:

In July 2021, Detroit applied for a grant opportunity known as the Youth Homelessness Demonstration Program (YHDP). YHDP is a federal funding opportunity made available to communities through the Department of Housing and Urban Development (HUD). The ultimate goal of the YHDP is to reduce youth homelessness.

In 2022, a community planning process was carried out, culminating in the completion of Detroit's Coordinated Community Plan (CCP) to end youth homelessness. The CCP acts as a guiding and organizing document in the youth space. The hope is that the awarded communities will build momentum around youth work and then share that experience to help mobilize communities around the country towards the same end – already in Michigan, we have seen several other communities apply for YHDP and look to Detroit for guidance.

The population served by YHDP is youth experiencing homelessness up to age 24. In April of 2023, Detroit's Youth Homelessness Demonstration Program (YHDP) grant period began. The following project types were funded and launched: Permanent Supportive Housing (PSH), Joint Component Transitional Housing Rapid Rehousing (TH-RRH), Rapid Rehousing (RRH) portion of the joint component program, and Crisis Mental Health. This initial round of YHDP funding goes through March of 2025. Three organizations that best represented our collective vision and had extensive experience serving youth are now implementing these new projects. The recipients are Ruth Ellis Center, Permanent Supportive Housing (PSH); MCHS Family of Services and Detroit Phoenix Center, Joint Component Transitional Housing Rapid Rehousing (TH-RRH); and MCHS Family of Services, Crisis Mental Health.

Additionally, improvements have been made to the CAM system for young people, with the addition of YHDP-funded youth-specific navigation services. This team, led by f Community and Home Supports (CHS), has helped our community to better meet youth where they are and get them connected to appropriate and necessary services. They also facilitate Detroit's new Youth Case Conferencing space, where providers can share resources and consult on client cases in real-time. Through these efforts, we are confident that we are improving outcomes for young people in our community. Detroit looks forward to evaluating these new projects to get a more complete picture of the impact they are having.

With the YHDP-funded projects off the ground, Detroit has been able to shift focus to the CCP and system-level work to address youth homelessness in our community. This work is being led by the CoC's Committee on Youth Homelessness (CYH). Seated committee members include a representative from the City of Detroit and other stakeholders in the youth space from MDHHS, the education system, the juvenile justice system, the Youth Action Board, the CoC Board, youth service agencies, and more. The CYH is working to make system improvements for youth and has begun exploring the possibility of Direct Cash Transfer programming through both private and public funding channels.

In addition to YHDP-funded projects discussed above, the following funded resources will be available to youth in Detroit:

- There will be at least one emergency shelter specifically for youth.
- There will be an organization that specifically provides drop-in services, counseling, and housing services to homeless youth who identify as LGBTQ.
- There will be two funded project-based Permanent Supportive Housing programs that are open to all but targeted to youth.

These efforts reflect the CoC's commitment to providing comprehensive support to diverse populations experiencing homelessness in Detroit.

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

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

With the assistance of funding from HUD's Office of Lead Hazard Control and Healthy Homes, as well as CDBG entitlement funding, Detroit LeadSafe provides lead-based paint hazard remediation to income eligible households with a child under the age of 6 or a pregnant woman. The City's 0% Interest Home Repair Loan Program (0%IHRLP) which is administered by the Detroit Local Initiatives Support Corporation (LISC) also includes federal CDBG and private loan capital that addresses lead-based paint hazards in homes where projects meet the requirements.

The target population for lead hazard reduction services is households with children under the age of six (6) years or where a pregnant woman resides. The eligible properties are single family structures and rental properties. The grant will also identify and address, if possible, other existing health and safety issues through the Healthy Homes Supplemental funding. CDBG funds provide the necessary matching funds for HUD LHR grants, as well as address non-lead emergency repairs. The City expects to complete a total of 500 housing units through a combination of abatement and interim controls over the next five years in all its programs.

The Detroit Health Department (DHD) administers the Childhood Lead Poisoning Prevention Program (CLPPP). The program seeks to eliminate childhood lead poisoning by increasing awareness regarding the hazards and sources of lead, identifying, and caring for children from birth through six years of age and pregnant women who have elevated blood lead levels and identifying and eliminating sources of lead exposure. To program provides:

- Case management, including home visits from Community Lead Advocates and Nurse Case Managers
- Lead testing to children under six years of age and pregnant women
- Referrals to community and health care partners as well as referrals for lead abatement and inspection
- Education to health care providers, community groups and families

The Detroit Lead Reduction Task Force (Lead Task Force) aims to reduce toxic lead exposure among Detroiters, particularly children, by working collaboratively across city departments and with community partners. Specifically, the Task Force aims to achieve the following goals by 2027:

- Reduce annual cases of EBLLs by 50%, and
- Increase testing rate for EBLLs to 50% of children

To achieve its goals, the Lead Task Force has adopted the following strategies:

- 1) Increasing testing for EBLLs for children across Detroit

- 2) Increase outreach efforts to educate families about lead poisoning prevention
- 3) Improve housing and infrastructure quality through increased inspections and repairs
- 4) Strengthen data practices to target outreach and resources most effectively
- 5) Coordinate temporary or permanent housing for children with EBLLs
- 6) Coordinate public funding and pursue philanthropic support

Since 2018, Detroit Water and Sewerage Department (DWSD) has replaced 13,812 lead service lines, with 2,114 of those being replaced from January to April 2025. In May 2023, DWSD started a neighborhood-by-neighborhood approach to replace lead service lines. Neighborhoods are prioritized based on density of housing built prior to 1945, significant number of children and seniors in the area and likely high number of low-income households based on Census tracts.

HRD has received several lead-based paint hazard reduction grants over the last several years and currently has four active grants. Through HUD's Office of Lead Hazard Control and Healthy Homes (OLHCHH), HRD has a FY19/High Impact Neighborhood LHR grant for \$9.7M that will end in May 2025 with close-out in August 2025. It is anticipated that more than 275 units will be assisted with those funds. HRD was awarded a FY22 LHR grant for \$5.65M to assist 150 households over 4 years and a FY24 LHR grant to assist 172 households over 4 years. In addition to the three active HUD LHR grants, HRD has received between \$1.2M and \$1.5M annually from the Michigan Department of Health and Human Services (MDHHS) and its Medicaid Child Health Insurance Plan (CHIP) program. CHIP assists between 20 and 30 units each year.

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

According to data from MDHHS, in 2022 there were 55,050 children in the City of Detroit, 13,456 were evaluated for lead, or 24.4% of children. Of those evaluated, 1,261 had elevated blood lead levels. Thirty percent of the City's housing stock was built prior to 1939, compared to the State at 13.8%. Ninety percent of the City's housing stock was built prior to 1980, and older homes pose a significant risk of lead exposure to Detroit children. According to 2022 data, 49.3% of children in Detroit 0-17 are in poverty, compared to 18.2% in the State. The percentage of babies born with low birth weight is 6.2% in Detroit and 3.1% Statewide. In addition, 2020 data show a crude rate of emergency department visits for asthma per 10,000 people to be 58.3 for Detroit and 29.1 in the State. This data points to a high need for both lead hazard reduction funding and healthy homes/emergency repair dollars to improve health outcomes in the City.

The actions listed above are all specifically designed to reduce elevated blood lead levels in the City and improve overall health outcomes for Detroiters. The Detroit Lead Reduction Task Force is tracking the EBLLs and testing rates to make sure that EBLL reduction is not due to lower testing/reporting rates.

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

In October 2024, Detroit City Council passed a major overhaul to rental inspections and oversight. The new system will streamline inspections to focus on the most serious safety issues, make it easy for landlords offering safe housing to comply and make sure that landlords offering unsafe housing – or

unwilling to comply – to get real penalties. The goal is to make it easy and inexpensive for landlords offering good quality housing to receive a certificate of compliance.

In October 2023, the Michigan Department of Health and Human Services (MDHHS) updated the requirements for lead testing in children, requiring physicians to test or order tests for all children at 12 and 24 months of age and at other intervals based on exposure risk.

HRD participates in the Michigan Alliance for Lead Safe Homes (MIALSH), a coalition of health professionals, environmental experts, contractors, and advocates, which aims to end lead-poisoning through policy change. HRD also participates in the Detroit Lead Partnership whose mission is to facilitate coordination, advocate for and monitor the progress of efforts to prevent and eliminate lead poisoning and other environmental health problems Detroit children face.

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

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

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

Many individuals and families at the poverty level face a significant housing cost burden in the Detroit area. A cost burden occurs whenever 30 percent or more of income is spent on housing. The most recent data lists the median family income in the Detroit-Warren-Livonia HUD Metro FMR Area at \$94,700 as of July 2023, meaning an affordable rent would be about \$2,367. The current Fair Market Rent (FMR) rate for a 2-bedroom unit in Wayne County is \$977, which is within the affordable range. However, there remains a critical need for additional affordable units to accommodate all income levels.

While the Detroit Housing Commission (DHC) provides approximately 4,000 public housing units and administers Section 8 vouchers, there remains a need for other housing resources to address this gap. The City of Detroit utilizes Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG) funds to prevent homelessness and assist those who are already homeless with shelter and supportive services. HOME Investment Partnerships Program (HOME) and CDBG funds are also used to construct affordable rental housing, assist with down payments to make homes affordable, and rehabilitate homes for low- and moderate-income persons in Detroit.

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

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

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

Detroit uses a combination of its CDBG, HOME, ESG, and Housing Opportunities for Persons With AIDS (HOPWA) funding, along with funding from the State of Michigan and local public and private sector funding, to provide a variety of affordable housing programs. CDBG funding is used to rehabilitate existing

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

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

Detroit is actively working to update its Master Plan of Policies, which serves as a roadmap for the city's future development. The updated plan aims to address current challenges and set forth policies and actions needed to achieve a shared vision for the city's future. The Master Plan Update process is anticipated to conclude in late 2025. Click on the following link for more information: [Master Plan of Policies | City of Detroit](#)

Furthermore, the City of Detroit's Housing and Revitalization Department (HRD) has implemented the **Inclusionary** Housing Ordinance, which requires annual reporting on **inclusionary** housing transactions and investments made through the Detroit Affordable Housing Development & Preservation Fund. This ordinance is part of the city's broader strategy to ensure that housing and neighborhoods are high quality, affordable, and accessible to all Detroiters.

In addition to these efforts, the City of Detroit has developed a 5-Year Strategic System Improvement Plan to prevent and end homelessness. This plan, established in collaboration with the Homeless Action Network of Detroit (HAND) and the Detroit Continuum of Care (CoC), outlines shared goals, priorities, and actions to address homelessness in the city. **More information on the October 2023 Interim Findings Report can be found on the City of Detroit's website: [BPA_DETInterimFindingsReport_FINAL.pdf](#)**

These initiatives, combined with the city's commitment to fiscal responsibility and economic development, reflect Detroit's comprehensive approach to reducing poverty and improving the quality of life for its residents.

SP-80 Monitoring – 91.230

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

Internal Monitoring

The Housing & Revitalization Department (HRD) is the responsible agency for ensuring compliance with all regulatory and statutory requirements relative to Community Planning and Development awards for the City of Detroit. Subrecipient agreements, service level agreements, or contracts are executed with partner agencies to facilitate activities. The agreements detail assigned responsibilities and performance measures to establish accountability standards. A monitoring strategy is used to assess Subrecipient performance and program effectiveness. Prior to entering into a subrecipient agreement, HRD and ODG perform a risk analysis to assess potential financial and performance risks. In the event that risks are identified the City has the ability to add grant conditions to subrecipient agreements. Risk analyses target attention to program activities and participants that represent the greatest risk and susceptibility to fraud, waste, and abuse. Once the level of risk is determined for each Subrecipient, the appropriate monitoring strategy is implemented to achieve the following objectives:

1. To determine if a subrecipient is carrying out the agreed upon scope.
2. To determine if a Subrecipient is carrying out its activities in a timely manner, in accordance with the schedule included in the Agreement.
3. To determine if a Subrecipient is charging eligible costs to the project.
4. To determine if a Subrecipient is conducting its activities with adequate control over program and financial performance, and in a way that minimizes opportunities for waste, mismanagement, fraud, and abuse.
5. To assess if the Subrecipient has a continuing capacity to carry out the approved project, as well as future grants for which it may apply.
6. To identify potential problem areas and to assist the Subrecipient in complying with applicable laws and regulations.
7. To assist Subrecipient's in resolving compliance problems through discussion, negotiation, and the provision of technical assistance and training.
8. To provide adequate follow-up measures to ensure that performance and compliance deficiencies are corrected by Subrecipient's and not repeated.
9. To ensure that required records are maintained to demonstrate compliance with applicable regulations.

HRD's monitoring plan involves a collaborative approach of programmatic and financial monitoring. HRD's program staff is responsible for monitoring the programmatic efforts of our Subrecipient's and service

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

Emergency Solutions Grant (ESG)

The Housing & Revitalization Department (HRD) is the City of Detroit department responsible for ensuring compliance with all regulatory and statutory requirements relative to ESG and CDBG Homeless Public Service funding. Therefore, it is incumbent upon the HRD staff to ensure Emergency Solutions Grant funds or those specifically delineated as match are spent on time and in compliance with all regulatory, statutory, and mandates outlined in the subrecipient agreements. HRD staff also ensure adherence to the Continuum of Care's written standards and City of Detroit Policies and Programmatic monitoring is an essential part of ensuring the effectiveness of programs funded to meet the basic needs of those at risk of or experiencing homelessness and ensuring the policies and procedures outlined by the City of Detroit are being adhered to. HRD developed the following policy and procedures to ensure that subrecipient monitoring is an effective ongoing process:

The risk assessment tool is a comprehensive tool that reviews the past programmatic and financial performance of subrecipients. Completed risk assessments target attention to program activities and participants that represent the greatest risk of poor programmatic performance and/or susceptibility to fraud, waste, and mismanagement. Once the level of risk is determined for each subrecipient, the appropriate monitoring level is determined. The risk assessment is shared with financial auditing staff in the Office of the Controller, and their monitoring documents are integrated into the risk assessment score. To ensure compliance, all subrecipients will receive annual risk assessments prior to any program expenditure. In addition, programs scoring for "high" risk will have annual programmatic site monitoring. Those who receive "medium" will receive, at minimum, quarterly desk audits and a bi "low" score will, at minimum, receive a bi-annual site visit and an annual site visit.

The City of Detroit may elect, at any time, to complete chart reviews to assess the quality of services offered to program participants or address regulatory concerns. The City of Detroit will issue a formal finding letter within 60 days following any desk or site monitoring. Any areas of concern will require a corrective action plan from the subrecipient. Failure to submit an acceptable plan of correction within the timeline outlined in the finding letter can result in additional action ranging from placing a hold on reimbursement requests to reallocation of funds awarded to the organization. These decisions will be made in concert with the Office of the Controller's monitoring staff and will be based on the seriousness of the original findings and the responsiveness of the subrecipient.

Programmatic monitoring for homeless service organizations encompasses the following:

Review of Policies and Procedures that outline client service provision

- File review of randomly selected client files, including review and comparison of information provided in the HMIS record with paper files
- For site-based projects, a physical inspection of the facility
- Staff Interviews

Housing Opportunities For Persons With HIV/AIDS (HOPWA)

The City of Detroit's Housing and Revitalization Department (HRD) is responsible for administering, monitoring and overall compliance of the HOPWA program, which is funded by formula grants from HUD. The Detroit Health Department (DHD) is responsible for the implementation of the grant, selecting project sponsors and contractors to assist in the administration of the program. Monitoring of those providers are the responsibility of DHD, with HRD oversight. Staff complete and monitor all leases of HOPWA assisted units to ensure compliance and conforms to the Housing Quality Standards (HQS) procedures for properties funded through HOPWA. Recertification occurs once per year on client's anniversary date, with staff monitoring households 3 times per year based on individualized housing plans.

Community Development Block Grant (CDBG)

The City of Detroit's Housing and Revitalization Department (HRD) is responsible for administering and ensuring compliance with all regulatory and statutory requirements for Community Development Block Grant (CDBG) funds. The City supports nonprofit and neighborhood service organizations through construction and non-construction grants with CDBG dollars. The Neighborhood Opportunity Fund (NOF) provides grants for public service activities under the scope of five priority areas – health, public safety, education, seniors, and recreation—that improve the quality of life for low-income residents. The Public Facility Rehabilitation program offers construction-based grants to nonprofit organizations delivering public service activities, enabling them to rehabilitate the facilities where services are provided.

Programmatic monitoring is an essential part of ensuring the effectiveness of programs funded to ensure the policies and procedures outlined by the City of Detroit are being adhered to. HRD developed the following policy and procedures to ensure that subrecipient monitoring is an effective ongoing process:

Neighborhood Opportunity Fund Scheduled Program Monitoring: If a subrecipient is identified through a Risk Assessment for an on-site or remote program monitoring, a monitoring date is established with the subrecipient. A formal letter is sent to the organization at least two (2) weeks prior to the scheduled visit (where possible), confirming the meeting date, purpose, as well as advising of specific documents, processes, and areas subject to review. During this visit, staff will verify that the programs outlined in the contract scope are being carried out as described in the agreement, as well as review documentation, conduct interviews with staff, and complete site inspections. The HRD staff conducting the program

monitoring shall inform the Subrecipient of any program findings and/or concerns within thirty (30) days after the conclusion of the monitoring visit.

Unscheduled/Scheduled Program Site Visit(s): **Unscheduled Site Visit:** Staff performing an unscheduled site visit shall consult the Subrecipient's agreement to confirm the location and operating hours of the program. During this visit, staff will verify that the programs outlined in the Subrecipient scope are being carried out as described in the Subrecipient agreement. Program staff will review client and staff sign in sheets and confirm the program is operating within the Subrecipient's scope and budget. During any declared health emergency, pandemic or stay home/stay safe orders issued by the County, State, City or Federal Government all unscheduled site visits will be deferred until the orders are lifted. **Scheduled Site Visit:** Staff performing a scheduled site visit shall arrange a mutual date and time, by formal communication (letter or email), with the Subrecipient at their program location. An entrance letter shall be sent by the project manager at least two weeks prior to the site visit outlining the documents and issues, and areas that will be reviewed. This visit will be scheduled during the normal operating hours of the Subrecipient to ensure the program is conducted during the hours as outlined in their proposal/scope of services. During any declared health emergency, pandemic or stay home/stay safe orders issued by the County, State, City or Federal Government all scheduled visits will be conducted in accordance with those orders taking all health care precautions.

Desk Monitoring: Desk Monitoring is performed on each contract award to ensure the standards and requirements are met according to the Subrecipient agreement, department policy, and regulatory requirements. Assigned HRD program managers complete a Desk Monitoring Review Checklist that includes reviews of support and reimbursement documentation, as well as Subrecipient's scope of work outlined in the Subrecipient agreement. Feedback regarding Subrecipient operations are communicated through deficiency letters and other documentation, as needed. During any declared health emergency, pandemic or stay home/stay safe orders issued by the County, State, City or Federal Government the primary monitoring of Subrecipients shall be a desk monitoring.

Public Facility Rehabilitation (PFR) Program:

The PFR grant allows subrecipients to rehabilitate physical structures in which public service activities take place and bring locations up to local, state, and federal codes. After an award is granted, the HRD staff administers the award as follows:

1. Monitoring is performed to ensure procurement is completed per federal procurement regulations.
2. HRD staff, including the HRD Construction team, review each payment request to ensure construction work has been completed per the approved project plan. Draw requests include the following documentation:
 - Partial and conditional lien waivers, sworn statements, AIA forms signed by the architect and general contractor, invoices, and any additional source documentation that accompanies the payment request package.

3. Prior to beginning construction, a five-year lien is placed on the property to notify the City of any ownership or indebtedness changes to the property that could potentially impact the federal use of real property requirement.
4. Project closeout procedures include the submission of final unconditional lien waivers, sworn statements, beneficiary data, confirmation of compliance with all City regulations, and before and after pictures.
5. During the five-year lien period, annual desktop monitoring is completed by HRD staff to ensure ongoing subrecipient services are consistent with a CDBG national objective and eligible activity.

HOME Investment Partnerships Program (HOME)

The City of Detroit Housing and Revitalization Department's Asset Management Team oversees the monitoring of all projects currently in their HOME Investment Partnership Program compliance period. Subrecipient agreements are not typically used for HOME funds, instead, HRD utilizes Development and Loan Agreements. The Asset Management Team has approved and implemented policies and procedures that include monitoring and reviewing the HOME portfolio on an annual basis. This includes support from third party contractors with HOME subject matter expertise on eligibility and income verification, loan servicing, and compliance inspections. The Contractor conducts the verification of the household incomes by collecting proof of income from a sample size of the households from each property management company that manages a HOME-assisted project. The Contractor informs the City of Detroit's Asset Management Team if each HOME-assisted project is leasing all units at the rental rates required per the regulations as stated in 24 CFR 92 and that each unit is occupied by an income-eligible household.

HRD's Construction Management Team schedules and performs on-site inspections of rental housing projects that are in their HOME compliance period. The Construction Management Team makes sure the HOME-assisted projects meet all National Standards for the Physical Inspection of Real Estate (NSPIRE). During these on-site inspections, the member of the City's Construction Management Team that is conducting the inspection follows all health and safety requirements as approved by the City of Detroit's Health Department; this includes following safety protocols designed to prevent the spread of COVID-19. The Construction Management Team and the Asset Management Team both review the NSPIRE reports and notify owners of compliance or non-compliance. The Construction Management Team and Asset Management Team continue to communicate with the property managers and property owners until their HOME-assisted projects meet all compliance requirements for each compliance year.

The Asset Management Team conducts regular monitoring of the loans funded through the HOME Investment Partnership Program. The goal of the City of Detroit's Asset Management Team is to complete a comprehensive review of each HOME Loan on an annual basis. Monitoring includes the identification and review of each multi-family or scattered-site real estate project secured as collateral for each HOME Loan. Performance of the subject property (used to secure the HOME Loan) is measured upon review of

audited or unaudited financials, payment history, certified rent rolls, and photographs of the subject property.

The majority of the City of Detroit's HOME Loans are secured by a Mortgage on the land and all improvements fixed to the land. Additionally, HOME Loans are typically secured by an Assignment of Leases and Rents on the property and a uniform commercial code filing on all personal property associated with the project and owned by the HOME Loan borrowing entity. The land and all improvements fixed to the land are also typically encumbered with an Affordable Housing Restriction. The terms of an existing HOME Loan can be modified upon agreement between the City of Detroit and the current HOME Loan borrower. A comprehensive write-up is completed by the Asset Manager for each modification. That same Asset Manager will work on that specific loan until the modification is closed.

Financial Monitoring

The Office of Development and Grants (ODG)-Compliance Division is obligated by 2 CFR 200 Subpart D, to conduct financial monitoring of all Subrecipients receiving pass-through grant funding. The primary purpose is to ensure Subrecipients use funds for authorized purposes and are in compliance with the terms of their subaward, and federal, state and local regulations. Financial monitoring also serves to identify potential issues, and deficiencies to ensure that corrective action is taken.

The Financial Monitoring process consists of the following key phases: Risk Assessment, Monitoring and Corrective Action Management. The Risk Assessment determines whether the Subrecipient will receive desk or on-site monitoring. During both reviews, a request is made for specific current documentation which includes but is not limited to: Financial Statements and as applicable Single Audit; Certificates of Insurance; Accounting policies and procedures, including internal controls; Organizational documents; Payroll items; Bank Reconciliations and if applicable, Program Income, Indirect Costs and Davis-Bacon information.

The monitoring process verifies that organizations expending more than \$750,000 (\$1M threshold effective for fiscal years that begin on or after October 1, 2024) in federal funds have undergone a Single Audit and have satisfied federal clearinghouse filing requirements. The Single Audit serves as an additional monitoring tool used to evaluate the fiscal accountability of Subrecipients and is required to be submitted. If the Single Audit is not applicable the Subrecipient must ensure that Audited Financial Statements and/or IRS FORM 990 are submitted and reviewed.

Through the key phases of Financial Monitoring, the audit staff evaluates risks, ensures regulatory and contractual compliance and evaluates risks for the potential of fraud, waste, mismanagement, and/or abuse. The audit staff also works with Subrecipients to provide guidance in correcting deficiencies identified through discussion and/or technical assistance. If unreconcilable issues are identified the monitoring process provides for escalation measures.

NRSA Monitoring

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

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

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

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

Action Plan

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

The anticipated expected federal resources to carry out activities and projects during the program year are from the Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME), Emergency Solutions Grant (ESG) and Housing Opportunities for Person with Aids Program (HOPWA). This coming fiscal year, the HOME Program Income is estimated at \$4.2m that will be available in the 2025-26 fiscal year, due to repayments anticipated as part of preservation transactions. Also, in addition, the city is expected to receive approximately \$1.4m from loan proceeds through the 0% Interest Home Repair Loan Program. These funds are used to pay back the private lender for their loan capital investment. The 2025-26 Fiscal Year awards are shown below:

Program	2024 Award
CDBG	\$32,283,682
HOME	\$ 5,984,902.09
ESG	\$2,879,131
HOPWA	\$ 3,542,718
Total	\$44,690,433.09

Based on the above allocations, the City of Detroit is expected to receive a total of \$44,690,433.09 from all HUD entitlement grant sources for the Action Plan. All funds have been allocated to meet the housing, homeless, public service and community development needs and goals identified in the Consolidated Plan. The City of Detroit plans to use these resources for the following eligible activities:

Eligible CDBG activities include: Property Acquisition, Blight Removal and Demolition, Community Development, Economic Development, Public Service, Homeless Public Services, Public Facilities and Improvement, Owner-occupied Home Repair, Homebuyer Assistance, Rehabilitation of rental housing, Relocation, Street Improvements, Flood Drainage Improvements, Privately Owned Utilities, Construction of Housing, Parks and Recreational Facilities and Administrative and Planning

Eligible HOME projects include: New Construction and Acquisition/Rehabilitation of multi-family and single-family rental housing, new construction and acquisition/rehabilitation of homebuyer housing.

Eligible HOPWA activities include: Permanent and transitional housing, supportive services, and

information/referral services

Eligible ESG activities include: Rapid Re-housing, Transitional Housing, Financial Assistance, Overnight Shelter, Rental Assistance and Outreach, permanent housing

Expected Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services Historic Preservation	32,283,682	0	1,400,000	33,683,682	129,134,728	The CDBG funds will be used to benefit low-and-moderate income persons through various social and economic programs, assisting with housing needs and eliminating slums and blight in targeted areas. The funds will assist in restoring and restructuring distressed areas while improving population growth throughout the city. Also, funds may be designated to perform relocation activities

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	5,984,902.09	0	4,200,000	10,184,902.09	23,939,608.36	HOME funds will be used to provide affordable housing including multifamily, rental, new construction, rehabilitation, and homebuyer activities to families whose household income is at 80% of the Area Median Income or less. Assistance will be provided in the form of grants and/or loans to for-profit and non-profit developers as gap financing. HOME funds will be leveraged with private and public funding sources to support the development of single and multifamily units through Low Income Tax Credits, equity from Federal Historic Tax Credits, developer equity, and from other banks and lending programs.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	2,879,131	0		2,879,131	11,516,524	The HOPWA funds will be used to serve homeless and non-homeless persons who meet income guidelines and are infected/and or affected by HIV/AIDS through Tenant Based Rental Assistance (TBRA) and Community Residential Programs while providing information and supportive services.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	3,542,718	0		3,542,718	14,170,872	The HOPWA funds will be used to serve homeless and non-homeless persons who meet income guidelines and are infected/and or affected by HIV/AIDS through Tenant Based Rental Assistance (TBRA) and Community Residential Programs while providing information and supportive services.

Table - Expected Resources

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

Federal grant funding alone is insufficient to meet the housing and community development needs of Detroit's low- and moderate-income households. To address this gap, the City has actively pursued public and private partnerships to leverage federal funds with additional private, state, and local resources. This collaborative funding approach increases the scope and effectiveness of eligible activities, ensuring broader community benefit and greater return on investment.

Where required, the City will meet matching requirements through a combination of local funds and in-kind contributions. These may include general fund allocations, tax increment financing, donated land, waived fees, or staff time. The initiatives and funding sources outlined below demonstrate how these efforts support the City's housing and community development goals during the five-year Consolidated Plan period.

- **Historic Tax Credits**

The federal Historic Rehabilitation Tax Credit (HTC) offers a 20% credit for qualified expenses to restore historic buildings. Before the 2017 tax reform, a 10% credit was also available for pre-1936 non-historic buildings. These incentives promote private investment in preserving and reusing historic structures.

- **The Michigan Low-Income Housing Tax Credit Program (LIHTC)**

The Low-Income Housing Tax Credit (LIHTC) Program, created by the 1986 Tax Reform Act, supports the development and preservation of affordable rental housing. Administered by MSHDA, it offers investors annual tax credits over 10 years to attract private capital. The City funds projects that receive MSHDA-awarded LIHTCs, including HOME-assisted developments with 9% competitive or 4% non-competitive credits.

- **Detroit Housing for the Future Fund**

The Detroit Housing for the Future Fund is a joint initiative between the City of Detroit and the Local Initiatives Support Corporation (LISC) to support affordable housing development and preservation. Funded by corporate and philanthropic grants and loans, it offers locally tailored financing tools such as predevelopment grants, low-interest senior and subordinate loans, and preferred equity. The initial \$58 million will be fully deployed by 2025, and additional capital is being raised to extend the fund into 2026.

- **Section 108**

The City plans to apply for \$75 million in Section 108 Loan Pool Authority to finance affordable housing projects. Eligible uses include acquisition, rehabilitation, and soft costs under CDBG and Section 108 guidelines. All loans will be secured with property or other collateral to avoid using CDBG funds for repayment. As of June 2025, the City has submitted a draft application to HUD and is preparing the final submission for July 1.

- **DEGC & EDC**

The DEGC works closely with the City of Detroit and other partners to support existing businesses and to bring new companies and investments to the City of Detroit. The professionals who work for DEGC act as

staff to several public authorities, whose board members are typically appointed by the Mayor and approved by Detroit City Council, and each public authority has a distinct responsibility based upon state enabling legislation. DEGC also works directly for the City of Detroit under contract and manages economic development efforts funded by private and foundation contributions, grants, and contracts.

- **Choice Neighborhoods Implementation & Planning Grants**

In May 2021, the City of Detroit was awarded a \$30 million Choice Neighborhoods Implementation (CNI) Grant to support a Transformation Plan focused on revitalizing target neighborhoods. In response to rising construction and financing costs, the City secured an additional \$5 million in 2023. By the end of the grant term in September 2028, the City will facilitate the development of new affordable and mixed-income housing and implement community improvements that support neighborhood revitalization.

The City has also expanded supportive services for residents in the target housing site, focusing on health, education, and economic self-sufficiency. Career coaching, resident engagement, and outcome evaluation efforts are underway to ensure residents benefit from the investments made through the grant.

Separately, in 2024, the City and Detroit Housing Commission (DHC) were awarded a \$500,000 Choice Neighborhoods Planning Grant to develop a comprehensive Transformation Plan for another public housing site and surrounding neighborhood. Additional funding has been leveraged to support planning, staffing, and community engagement activities. The final Transformation Plan, due by September 2026, will outline strategies for improving housing, increasing mixed-income options, enhancing neighborhood conditions, and connecting residents to services and opportunities.

- **Pathways to Removing Obstacles to Housing grant (PRO Housing)**

The City of Detroit was awarded a \$4.2 million Pathways to Removing Obstacles to Housing grant (PRO Housing) from HUD to advance policies and programs that accelerate the development and preservation of affordable housing. These funds will specifically be used to update the City's zoning code, develop a pre-permitted pattern home program, launch a small project rehabilitation program, and launch a pre-development program to support multifamily housing development in Detroit neighborhoods.

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

The City of Detroit owns public libraries, community parks and recreation centers located within the City which may be used for public service activities funded under the various HUD programs.

The City of Detroit has a land bank authority that is responsible for returning the city's many blighted and vacant properties to productive and valuable use. The land bank maintains the City's publicly owned parcels and acquires additional foreclosed/abandoned property and vacant lots. The City then addresses these properties through demolition, rehabilitation, and disposition to help stabilize neighborhood decline. For eligible properties, the land bank authority utilizes a variety of sales programs to offer homes to residents, such as the Community Partner Program, Auctions, Own-It-Now, Rehabbed & Ready and the

Residential Side Lot program. Additionally, the City has some select land parcels, owned by the City of Detroit, that will be sold for new housing construction projects.

Since 2015, several large philanthropic organizations, including The Bank of America Charitable Foundation, The Erb Family Foundation, and The Kresge Foundation have awarded over \$3.7 million in much needed funding to Detroit Future City (DFC) in support of its efforts to promote the advancement of land use and sustainability, and community and economic development, including its Working With Lots program. This program provides technical assistance and grants to community-based organizations working to sustainably repurpose vacant land in Detroit residential neighborhoods. Since 2016, DFC has awarded more than \$330,000 to community groups, faith-based institutions, non-profits, and businesses to install one of 38 lot designs to activate community spaces, address stormwater concerns, and create more attractive neighborhoods. Adaptive reuse projects through this program make use of DFC vacant land transformation designs published in the DFC Field Guide to Working With Vacant Lots.

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Reduce homeless citizens in City of Detroit	2025	2026	Homeless	City-Wide	<p>Increase in affordable rental housing option</p> <p>Homeless Prevention Rental Assistance Homeless Street Outreach Emergency Shelter and Transitional Housing Rapid Re-housing</p>	<p>CDBG: <u>\$2,395,517</u> ESG: <u>\$2,879,131</u> Coc: <u>\$ 40,183,097</u></p>	<p>Tenant-based rental assistance / Rapid Rehousing: <u>1,555</u> Households Assisted All "Extremely Low" income benefit Homeless Person Overnight Shelter: <u>4,008</u> Persons Assisted All "Extremely Low" income benefit Overnight/Emergency Shelter/Transitional Housing Beds added: <u>0</u> Beds All "Extremely Low" income benefit Homelessness Prevention: <u>74</u> Persons Assisted All "Extremely Low" income benefit Homeless Outreach: <u>1,646</u> Persons Assisted</p>

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Rehabilitation of Existing Housing Units	2025	2026	Affordable Housing rehabilitation of existing housing units	City-Wide NRSA	Rental Assistance Production of new housing units Rehabilitation of existing units Acquisition Rehabilitation of Existing Units incl 0% loan and Sr. Home Repair programs and Lead Remediation Development of Permanent Supportive Housing	HOME: <u>\$5,984,902.09</u> CDBG: <u>\$3,670,070</u> CDBG: <u>\$3,957,190</u> CDBG: <u>\$1,500,000</u>	Rental units constructed: <u>85</u> Household Housing units <u>100%</u> low/mod Rental Units rehabilitated: <u>80</u> Household Housing Unit <u>20%</u> extremely low; <u>40%</u> low; <u>35%</u> low/mod; <u>5%</u> middle Acquisition of existing units: <u>TBD</u> Household Housing Units Permanent Supportive Housing units constructed: <u>15</u> Household Housing Units (see above income %) Homeowner Housing Rehabilitated: Household Housing <u>200</u> Units 55% extremely low; 30% low; 10% low/mod; 5% middle income Lead Remediation: <u>150</u> Household Housing Units <u>50%</u> of extremely low; <u>30%</u> of low; <u>20%</u> of low/mod; <u>0%</u> middle income

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Homeownership Program	2025	2026	Affordable Housing	City-Wide NRSA	Down Payment Assistance	CDBG: <u>\$2,160,000</u>	Loans Provided: <u>325</u> 20% low; 75% low/mod; 5% middle income
4	Public Services Activities for Citizens of Detroit	2025	2026	Public Service Summer Youth Employment	City-Wide NRSA	Public Services Activities Job/Job Training	CDBG: \$2,447,035 CDBG: <u>\$ 1,500,000</u>	Public Service activities: <u>168,813</u> Persons assisted <u>500</u> Youth assisted 20% low; 75% low/mod; 5% middle income
5	Econ Dev (Creation/Retainage of Jobs/Small Businesses)	2025	2026	Non-Housing Community Development	City-Wide NRSA Areas	Economic Development Jobs/Small Business	CDBG: \$ <u>__0__</u>	Businesses assisted: <u>__TBD__</u> Jobs created and/or retained
6	Sustain Infrastructure and Public Improvements	2025	2026	Non-Housing Community Development	City-Wide	Public Improvement & Infrastructure	CDBG: <u>\$ 500,000</u>	Other: <u>10,000</u> residents of LMA served
7	Public Facilities and Improvements- Public facilities rehabilitation	2025	2026	Non-Housing Community Development	City-Wide	Public Facilities	CDBG: <u>\$ 1,000,000</u>	Other: <u>14</u> Public Facilities <u>56,434</u> residents of LMA served <u>56,434</u> community benefit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Blight removal and demolition	2025	2026	Demolition	City-Wide	Demolition Clearing Acquisition of Existing Units	CDBG: \$TBD	Buildings Demolished: <u>TBD</u> Structures (includes schools, commercial and residential properties)
9	Section 108 Repayment	2025	2026	Non-Housing Community Development	City-Wide	Economic Development	CDBG: \$TBD	Businesses assisted: <u>TBD</u> Other
10	Help those with special needs (non-homeless)	2025	2026	Non-Homeless Special Needs	City-Wide	Public Services Rental assistance	HOPWA: \$3,542,718	HIV/AIDS Housing Operations <u>55</u> Tenant-based rental assistance: <u>240</u> Household Housing Units
11	Other: Relocation	2025	2026	Non-Housing Community Development	City-Wide	Relocation of displaced residents	CDBG: \$ <u>TBD</u>	Number of individuals or households <u>TBD</u> Persons or Households Assisted
12	Other: Residential Historic Preservation	2025	2026	Housing Rehabilitation	City-Wide	Rehabilitation of Existing Units	CDBG: \$0	Number of individuals or households <u>TBD</u> Persons or Households Assisted
13	Other: Provide interim assistance to address emergencies	2025	2026	Non-Housing Community Development	City-Wide	Emergency conditions threatening health and safety	CDBG: \$0	Number of individuals or households <u>TBD</u> Persons or Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
14	CDBG Planning and Administration	2025	2026	Affordable Housing		CDBG Planning and Administration	CDBG: <u>\$6,456,736</u>	Other
15	CDBG Housing Rehabilitation Activity Delivery Cost	2025	2026	Affordable Housing	City-Wide	Rehabilitation of existing owner-occupied units	CDBG: <u>\$5,572,648</u>	Other

Goal Descriptions

<p>1</p>	<p>Goal Name</p>	<p>Reduce homeless citizens in City of Detroit</p>
<p>2</p>	<p>Goal Name</p>	<p>Rehabilitation of Existing Affordable Housing</p>
<p>3</p>	<p>Goal Name</p>	<p>Homeownership Program</p>

	Goal Description	Homeownership Down Payment Assistance Loans Provided: 325 20% low; 75% low/mod; 5% middle income
4	Goal Name	Public Services Activities for Citizens of Detroit
	Goal Description	Public services activities to benefit Citizens of City of Detroit Public Service activities: 168,813 Persons assisted 20% low; 75% low/mod; 5% middle income 500 Youth assisted 20% low; 75% low/mod; 5% middle income
5	Goal Name	Econ Dev (Creation of Jobs/Small Businesses)
	Goal Description	Small businesses help and retain/creation of jobs and provide necessary goods and services to low-income neighborhoods Business Assisted: TBD Jobs created and/or retained
6	Goal Name	Sustain Infrastructure and Public Improvements
	Goal Description	Public Improvement & Infrastructure Other: 10,000 residents of LMA served Area Benefit: Low/Moderate Income
7	Goal Name	Public Facilities and Improvements
	Goal Description	Public facilities and improvements for citizens of the City of Detroit. Other: 14 Public Facilities 56,434 residents of LMA served 56,434 community benefit
8	Goal Name	Blight removal and demolition
	Goal Description	Blight removal within the City of Detroit. Demolition of abandoned and dangerous structures including commercial and residential structures. Buildings Demolished: TBD Structures (includes schools, commercial and residential properties)
9	Goal Name	Section 108 Repayment
	Goal Description	Repayment of Section 108 loans on development Projects Other: Rehabilitation of Units

10	Goal Name	Help those with special needs (non-homeless)
	Goal Description	Help those with special needs HIV/AIDS Housing Operations <u>55</u> Tenant-based rental assistance: <u>240</u> Household Housing Units
11	Goal Name	Address relocation of displaced residents
	Goal Description	Relocation of displaced residents Number of individuals or households <u>TBD</u> Persons or Households Assisted
12	Goal Name	Residential Historic Preservation
	Goal Description	Rehabilitation of Existing Units <u>TBD</u> Persons or Households Assisted
13	Goal Name	Provide interim assistance to address emergencies
	Goal Description	Federal funds will be used to provide interim assistance to address emergency conditions that threaten public health and safety or to stop physical deterioration when immediate action is necessary. The amounts are to be determined.
14	Goal Name	CDBG Planning and Administration
	Goal Description	Planning and Administration for staff costs related to the implementation of CDBG activities
15	Goal Name	CDBG Housing Rehabilitation Activity Delivery Cost
	Goal Description	CDBG Housing Rehabilitation Activity Delivery Cost for staff costs related to Housing rehabilitation activities

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

Affordable housing services are provided to extremely low-income, low-income, and moderate-income families living in the City of Detroit, with priority given to strategic areas and other Investment Strategy initiatives (see Annual Goals and Objective chart above for percentages). These initiatives draw on market information and physical conditions analysis embedded to help guide investment of limited resources and identify areas with the greatest potential for sustainability and reinvestment.

AP-35 Projects – 91.220(d)

Introduction

The activities described in the 2025 Action Plan, reflect the City’s highest priorities and goals. Housing Development, including Single-Family Home Rehabilitation, Public Facility Rehabilitation, Public Services and Non-Housing Special Needs are critical community needs that will be addressed by investing HUD funds wisely and strategically. The plan is a culmination of data analysis, prioritization of resources, collaboration between the Mayor and City Council, and partnerships with community groups and other stakeholders to revitalize Detroit neighborhoods.

Over seventy percent of HUD funds are targeted in geographic locations that aligns with other investments, taking advantage of community assets and advancing the restoration of distressed communities. It is a strategy born of necessity. In Detroit, the demand for services far exceeds available funding levels, and almost all Census tracts in Detroit are over 51 percent low to moderate income. Accordingly, the Action Plan and Public Housing Assistance used geographic targeting to be more strategic in making investments that will benefit low- and moderate-income people throughout the city. For Fiscal Year 2025-26, the projects are listed below:

Projects

#	Project Name
1	ADMINISTRATION AND PLANNING (ADM/PLN)
2	HOUSING REHABILITATION HOME REPAIR (HR) HOUSING COUNSELING & LEAD REMEDIATION
3	HOUSING PRE-DEVELOPMENT COSTS (AFFORDABLE HOUSING) AND DIRECT HOMEOWNER ASSISTANCE
4	PUBLIC FACILITY REHABILITATION AND PUBLIC IMPROVEMENT (PFR)
5	PARK IMPROVEMENTS AND NEIGHBORHOOD FACILITIES (PRK/NEIGH)
6	PUBLIC SERVICE (PS)
7	HOMELESS PUBLIC SERVICE (HPS)
8	SECTION 108 LOANS (REPAY)
9	CONSTRUCTION OF HOUSING
10	RELOCATION

#	Project Name
11	CLEANUP OF CONTAMINATED SITES
12	HOME Assisted Housing (HOME) (2025)
13	ESG25 Detroit (2025)
14	HOPWA 2025 City of Detroit MIH25F001
15	CDBG HOUSING ACTIVITY DELIVERY

Table - Project Information

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

Analysis of consultations, plans, studies, and surveys were used to establish priorities. These priorities were also based on projects submitted during the City's CDBG proposal process, department recommendations, on-going and new development activities in the City, as well as priorities developed and considered during the review process. In addition, other Consolidated Plan programs (HOME, ESG and HOPWA) prioritized investment based on a combination of needs, development activities, and the ability to carry out projects. For fiscal year 2025-26, priorities are listed below:

* Housing Rehabilitation

- 0% interest Home Repair loan program
- Home Repair
- Housing Counseling
- Lead Hazard Reduction Programs

*Public Service

- Education
- Seniors
- Health
- Public Safety
- Recreation

* Homeless Public Service

- Street Outreach

- Emergency Shelter Services
 - Rapid Re-housing
 - Homelessness Prevention
- * Public Facility Rehabilitation
 - * Economic Development
 - * Section 108
 - * Administration/Planning
 - * Residential Historic Preservation
 - * Homeownership Assistance
 - * Relocation
 - * Cleanup of Contaminated Sites

(A complete list of the City's priorities is indicated in 2025-29 Consolidated Plan, SP-25 Priority Needs)

As discussed in the 2025-2029 Consolidated Plan, lack of resources is a primary obstacle to meeting underserved needs in the City of Detroit. The City has used federal grants to address the obstacle of decreasing resources and will continue seeking grant funds to meet underserved needs. The City has also committed its grant funds to areas with active, effective community organizations and community development corporations in the belief that local community efforts will increase the effectiveness of City activities in improving neighborhoods.

In addition, there were other challenges addressing underserved needs due to vacant and abandoned structures, and the increased costs of providing services to the city's residents.

AP-38 Project Summary

Project Summary Information

1	Project Name	ADMINISTRATION AND PLANNING (ADM/PLN)
	Target Area	City-Wide
	Goals Supported	CDBG Planning and Administration
	Needs Addressed	Rehabilitation of existing owner-occupied units Increase in affordable rental housing options Increased homeownership opportunities Expand economic development opportunities Increased employment training - public services Increase Public Improvement & Infrastructure Increased Community and Public Facilities Increased Public Services Homeless Prevention Emergency Shelter and Transitional Housing Rapid Re-housing Permanent Housing
	Funding	CDBG: \$ 6,456,736.00
	Description	Planning and Administration for staff costs related to the implementation of CDBG activities
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	N/A
2	Project Name	HOUSING REHABILITATION HOME REPAIR (HR) HOUSING COUNSELING & LEAD REMEDIATION

	Target Area	City-Wide NRSA Areas Slums and Blight Designation
	Goals Supported	Rehabilitation of Existing Affordable Housing
	Needs Addressed	Rehabilitation of existing owner-occupied units
	Funding	CDBG: \$10,315,223 + \$1,400,000(P.I.) totaling \$11,715,223
	Description	Zero interest loans to eligible low- and moderate-income homeowners including service delivery staff cost for housing rehabilitation that will be leveraged with other sources of funds to create greater impact and leveraging. It includes emergency home repair grants for seniors, housing counseling and lead remediation. May also include Acquisition Rehabilitation. The amount includes P.I. from 0% interest loan in the amt of \$1,400,000 that will be invested back into the program
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	275 low and low-moderate families
	Location Description	City Wide, NRSA and Slums and Blighted
	Planned Activities	see above
3	Project Name	HOUSING PRE-DEVELOPMENT COSTS (AFFORDABLE HOUSING) AND DIRECT HOMEOWNER ASSISTANCE
	Target Area	City-Wide
	Goals Supported	Rehabilitation of Existing Affordable Housing Homeownership Program CDBG Housing Rehabilitation Activity Delivery Cost Construction of Housing Clean up of Contaminated Sites
	Needs Addressed	Rehabilitation of existing owner-occupied units Increase in affordable rental housing options Increased homeownership opportunities
	Funding	CDBG: \$ 5,830,070

	Description	Pre-development cost for the rehabilitation and new construction of publicly/privately owned properties for Detroit low and moderate income residents, including affordable housing direct homeownership assistance
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	325 Low and moderate families
	Location Description	City-wide
	Planned Activities	see above
4	Project Name	PUBLIC FACILITY REHABILITATION AND PUBLIC IMPROVEMENT (PFR)
	Target Area	City-Wide
	Goals Supported	Increase in Public Facilities and Improvements Residential Historic Preservation
	Needs Addressed	Increase Public Improvement & Infrastructure
	Funding	CDBG: \$1,000,000
	Description	Public Facility Rehabilitation of Public Facilities buildings that operates Public Service activities and adding capacity for homeless shelter facilities. Also, includes Public Improvements to sustain infrastructure
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	City-wide
	Planned Activities	see above
5	Project Name	PARK IMPROVEMENTS AND NEIGHBORHOOD FACILITIES (PRK/NEIGH)
	Target Area	City-Wide
	Goals Supported	Sustain Infrastructure and Public Improvements Increase in Public Facilities and Improvements

	Needs Addressed	Increase Public Improvement & Infrastructure
	Funding	CDBG: \$500,000
	Description	Public Improvements to rehabilitate parks, tree canopy, open space and to build greenways
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	10,000
	Location Description	TBD
	Planned Activities	see above
6	Project Name	PUBLIC SERVICE (PS)
	Target Area	City-Wide NRSA Areas
	Goals Supported	Public Services Activities for Citizens of Detroit
	Needs Addressed	Increased employment training - public services Increased Public Services
	Funding	CDBG: \$3,947,035
	Description	Public Service activities including NRSA Summer Youth Employment and Training
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	169,313 individuals
	Location Description	City-wide and NRSA
	Planned Activities	see above
7	Project Name	HOMELESS PUBLIC SERVICE (HPS)
	Target Area	City-Wide

	Goals Supported	Reduce homeless citizens in City of Detroit Provide interim assistance to address emergency
	Needs Addressed	Homeless Prevention Emergency Shelter and Transitional Housing Rapid Re-housing Permanent Housing
	Funding	CDBG: \$2,395,517 ESG: \$2,879,131 Continuum of Care: \$36,540,978
	Description	Public Service programs for the homeless
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	7,283 low and extremely low families
	Location Description	City-Wide
	Planned Activities	see above
8	Project Name	SECTION 108 REPAYMENT
	Target Area	City-Wide
	Goals Supported	Section 108 Repayment
	Needs Addressed	Expand economic development opportunities
	Funding	CDBG: \$0
	Description	Repayment of Section 108 Loans
	Target Date	TBD
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	city-wide
	Planned Activities	see above

9	Project Name	CONSTRUCTION OF HOUSING
	Target Area	City-Wide
	Goals Supported	Construction of housing
	Needs Addressed	Increase in affordable rental housing options Increased homeownership opportunities
	Funding	CDBG: \$0
	Description	Construction of Housing affordable housing units
	Target Date	N/A
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	see description
10	Project Name	RELOCATION
	Target Area	City-Wide
	Goals Supported	Address relocation of displaced residents
	Needs Addressed	Homeless Prevention
	Funding	CDBG: \$0
	Description	Address relocation of displaced residents
	Target Date	N/A
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	CITY-WIDE
	Planned Activities	see description above
11	Project Name	CLEANUP OF CONTAMINATED SITES
	Target Area	City-Wide

	Goals Supported	Blight removal and demolition Cleanup of Contaminated Sites
	Needs Addressed	Rehabilitation of existing owner-occupied units Increase in affordable rental housing options
	Funding	CDBG: \$0
	Description	Cleanup of contaminated sites for rehabilitation projects
	Target Date	N/A
	Estimate the number and type of families that will benefit from the proposed activities	TBD
	Location Description	City-Wide
	Planned Activities	see above
12	Project Name	HOME Assisted Housing (HOME) (2025)
	Target Area	City-Wide
	Goals Supported	Rehabilitation of Existing Affordable Housing
	Needs Addressed	Rehabilitation of existing owner-occupied units Increase in affordable rental housing options Increased homeownership opportunities
	Funding	CDBG: \$5,984,902.09
	Description	Affordable housing rehabilitation including rental units constructed. The amount includes estimated Home Program Income for FY 2025-26 \$4,200,000.
	Target Date	N/A
	Estimate the number and type of families that will benefit from the proposed activities	TBD
	Location Description	City-Wide
	Planned Activities	see above description
13	Project Name	ESG25-Detroit (2025)
	Target Area	City-Wide
	Goals Supported	Reduce homeless citizens in the City of Detroit

	Needs Addressed	Homeless Prevention Emergency Shelter and Transitional Housing Rapid Re-housing Permanent Housing
	Funding	CDBG: \$2,879,131
	Description	ESG Activities includes Administration, Emergency Shelter, Outreach, Rapid Re-housing, Homeless Prevention and Data Collection.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	TBD
	Location Description	City-Wide
	Planned Activities	see above
14	Project Name	HOPWA 2025 City of Detroit MIH25F001
	Target Area	City-Wide
	Goals Supported	Assist special needs (non-homeless) populations
	Needs Addressed	Homeless Prevention
	Funding	CDBG: \$3,542,718
	Description	HOPWA administration and short-term emergency/transitional housing including rental assistance, supportive/informational services for clients who may or may not be medically fragile but who have and HIV/AIDS diagnosis.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	295
	Location Description	City-Wide
	Planned Activities	see above
15	Project Name	CDBG HOUSING ACTIVITY DELIVERY
	Target Area	City-Wide NRSA Areas Slums and Blight Designation

Goals Supported	Rehabilitation of Existing Affordable Housing CDBG Housing Rehabilitation Activity Delivery Cost
Needs Addressed	Rehabilitation of existing owner-occupied units Increase in affordable rental housing options
Funding	\$5,572,648
Description	CDBG housing rehabilitation activity delivery staffing costs
Target Date	6/30/2026
Estimate the number and type of families that will benefit from the proposed activities	N/A
Location Description	City-Wide
Planned Activities	see above description

Affordable Housing

AP-50 Geographic Distribution – 91.220(f)

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

The City of Detroit received approval from HUD for the renewal of five areas as Neighborhood Revitalization Strategy Areas (NRSAs) to focus its investment on neighborhoods that meet the NRSA criteria. The NRSA Plan is designed to use Community Development Block Grant funds in new ways. The plan includes strategies intended to build market confidence in Detroit neighborhoods by stabilizing housing stock, increasing home values, growing small businesses, preparing our youth for future employment, and building wealth for Detroit families. The following is a description of the five NRSAs within the City of Detroit:

NRSA 1:

The boundaries are as far west as Saint Aubin Street, and spans encompasses areas to the east as far as Calvin Avenue. The southern boundary is Jefferson Avenue as well as the Detroit River, while the northern boundary is as far north as E. McNichols Road. NRSA 1 exhibits high levels of housing vacancy and aging residential structures, with 81% of its homes built before 1940. Only 46% of units are owner-occupied, below the citywide average. The area has the highest percentage of elderly residents (15%) and a significant share of households with incomes below \$15,000 annually. Commercially, it has 4% of its land designated as vacant commercial property and 43% as vacant residential, the highest among all NRSAs. These conditions highlight the need for substantial investment in housing stabilization and neighborhood revitalization.

NRSA 2:

The boundaries are as far west as Trinity Street, as far south as Paul Street, as far east as Livernois Avenue, and as far north as Interstate 96. Housing in NRSA 2 is moderately older, with 36% of homes built between 1940 and 1969 and 53% built before 1940. It is slightly higher than average homeownership at 50% and the largest youth population, with 29% under the age of 18. Economically, 19% of local employment is in healthcare, providing a comparative industry advantage. The area has 27% of land classified as vacant residential and 3% as vacant commercial, offering redevelopment opportunities with less vacancy pressure than NRSA 1.

NRSA 3:

The southern boundary is Interstate 75, the western boundary abuts the City of Detroit's boundary, the northern boundary is W 7 Mile Road, and the most eastern portion follows Woodward Avenue. NRSA 3 is the most populous and ethnically diverse area, containing neighborhoods like Mexicantown with a 28%

Hispanic/Latino population and a significant Asian community. Only 1% of homes were built after 2010, and 74% were built before 1940, indicating an aging housing stock. Homeownership is around 49%, close to the city average. Although the area has 34% vacant residential land and 4% vacant commercial land, it also has one of the lowest median home values and rents, which may offer affordability but signals disinvestment.

NRSA 4:

The boundaries are as far north as 8 Mile Road, as far west as Interstate 75, as far east as Interstate 94, and as far south as Brockton Street. NRSA 4 has the highest concentration of manufacturing employment (18%), and the second-highest percentage of homes built before 1940 (55%). It has relatively low homeownership at 46% and the smallest elderly population (10%). This NRSA exhibits better income metrics than others and has the lowest share of vacant residential land (22%). With its industrial base and lower vacancy, NRSA 4 stands out for economic potential, although aging housing still poses a challenge.

NRSA 5:

The southern boundary is Lyndon Street, the western boundary is the Detroit city line, the eastern boundary is Outer Dr. W, and the northern boundary is Pembroke Avenue. NRSA 5 is the smallest NRSA by population but has the highest rate of homeownership (53%) and a more balanced age distribution. About 33% of the land is classified as vacant residential, and the housing stock, while still old, includes a slightly higher share of newer structures. Educational attainment is relatively strong, with the highest share of residents holding some college education. Nonetheless, the area still faces challenges related to low income, vacant properties, and aging infrastructure. Investment is needed to support home repairs, infill development, and youth services.

Slum and Blight Designation

The issue of vacant or substandard homes contributes significantly to the broader problem of slum and blight. To address this, the City will continue using the slum and blight area designation as outlined in 24 CFR 570.208(b)(1). This designation supports activities aimed at preventing or eliminating slums or blight within designated areas. The City will maintain its blight reduction efforts both citywide and within the three designated slum and blight areas adjacent to the NRSA, as previously described.

There are three (3) slum and blighted areas that meets HUD criteria.

Area 1:

Cody Rouge and Warrendale - Bounded roughly by Rouge Park to the West, Fullerton/I-96 to the North, Southfield Freeway to the east (includes east of Southfield freeway at Tireman), and the City boundaries to the South.

Area 2:

Delray - Generally bounded by I-75 to the North, Grand Blvd to the East, Jefferson to the South, and Rouge River to the West.

Area 3:

Conant-Davison - Bounded generally by Davison and McNichols to the North, Mount Elliot to the East, and the City boundary with Hamtramck/Highland Park to the South and West.

Geographic Distribution :

Target Area	Percentage of Funds
City-Wide	85
NRSA's	13
Slum and Blight Areas	2

Table - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Most Detroit's targeted investments will benefit low- and moderate-income people or low- and moderate-income areas. City-wide targeting considers that 83 percent of the City's block groups have 51 percent or more low- and moderate-income residents. Renewal of the NRSA's are complete. Benefits include:

- Job Creation/Retention and as Low/Moderate Income Area Benefit: Job creation/retention and training activities undertaken pursuant to the strategy may be qualified as meeting area benefit requirements, thus eliminating the need for a business to track the income of persons that take, or are considered for, such jobs (24 CFR 570.208 (a)(1)(vii) and (d)(5)(i));
- Aggregation of Housing Units: Housing units can be part of a single structure for the purposes of applying the low-and moderate- income national objective criteria. If 51% or more of all the assisted units provide a LMI benefit, all units are considered as meeting a national objective; therefore, allowing assistance to housing occupied by non-LMI households. All eligible housing assistance such as home repair, new construction through a CBDO and home purchase assistance are allowed. (24 CFR 570.208(a)(3) and (d)(5)(ii)).

- Aggregate Public Benefit Standard Exemption: Economic development activities carried out under the strategy may, at the grantee's option, may be exempt from the aggregate public benefit standards, thus increasing a grantee's flexibility for program design as well as reducing its record-keeping requirements (24 CFR 570.209 (b) (2)(v)(L) and (M)); and
- Public Service Cap Exemption: Public services carried out in the NRSA by a Community Based Development Organization (CBDO) are exempt from the 15% public service cap allowing more services in the NRSA and better leveraging of public service funding. (24 CFR 570.204(b)(2)(ii)).

Major NRSA projects include the following:

- Youth Employment: This year the City will invest CDBG funds totaling \$1.5 million for Summer Jobs training program for Detroit youth. The program will provide job training, skill building, and employment opportunities for “at risk” and low-income youth to help them gain valuable workplace experience. Funds will be leveraged with a corporate match.
- Zero Interest Loan Program: Grant funds of 1 million will be leveraged with other sources of funds to create greater impact & leveraging. In addition to loan funds available City-wide, CDBG funds is available for housing rehabilitation loans in NRSA's
- Motor City Match/Restore program is vital to Detroit small businesses with funds over 1.5 million (funded from the City’s general fund). The program assists businesses with technical assistance, improving facade exteriors/landscaping. It is increased economic opportunities with job growth within the city and NRSA's

The City of Detroit launched Investment Strategy Initiatives designed to revitalize declining areas within the City. Three areas meet the CDBG slum and blight “area basis” description. These areas met the following requirements:

1. The definition of a slum, blighted, deteriorating or deteriorated area under state or local law or ordinance. The area met one or both conditions of "a" or "b" below:

a) At least 25% of the properties in the area experience one or more of the following conditions: physical deterioration of buildings or improvements; abandonment of properties; chronic high occupancy turnover rates or chronic high vacancy rates in commercial/industrial buildings; significant declines in property values or abnormally low property values relative to other areas in the community; known or suspected environmental contamination, b) The public improvements in the area are in a general state of deterioration.

Discussion

Target area activities will primarily benefit low/moderate income citizens or areas within the city where at least 51 percent or more Detroit residents are low/moderate income. This year at least 82 percent of investments will benefit low- and moderate-income citizens or low- and moderate-income areas within the City (exceeding the minimum threshold for the primary objective [1]).

Geographic allocations will be targeted using a plan based on the Detroit Future Cities strategic plan, NRSA plan, and Slum and Blight designations. 83 percent of Detroit block groups have 51 percent or more low/moderate income residents. Accordingly, resources available in this Action Plan, DHC, Detroit Housing for the Future Fund (DHFF), and Strategic Neighborhood Fund (SNF) were geographically targeted to benefit as many low- and moderate-income residents as possible. HOME projects also target low- and moderate-income residents and targets specific geographic areas according to the HOME Notice of Funding Availability (NOFA). The HOME NOFA is scheduled for completion later this year.

City-wide activities provide services to the entire City, overlapping NRSA and Slum and Blight areas. City-wide allocations include CDBG and ESG organizations providing shelter, outreach, and services for the homeless and those at risk for homelessness. In addition, many housing programs such as HOPWA and CDBG (housing rehabilitation activities) are available city-wide. See Maps (in the Appendices) for NRSA and Slum & Blight areas.

AP-55 Affordable Housing – 91.220(g)

Introduction

Providing decent, safe, and affordable housing is a critical step to revitalizing many of Detroit's neighborhoods. It is also an important anti-poverty strategy. The City is committed to ensuring that existing housing is in good condition and new housing is built in areas targeted for growth, and that a path to housing is available for individuals and families who are homeless or at risk of homelessness or are low to moderate income. By doing so, the City can help keep at-risk populations from becoming homeless and prevent housing costs from becoming an overwhelming burden to low- and moderate-income households.

The City uses a combination of Community Development Block Grant (CDBG), Community Development Block Grant CARES Act (CDBG-CV), *Community Development Block Grant Disaster Recovery* (CDBG-DR), HOME Investment Partnership Program (HOME), HOME Investment Partnerships American Rescue Plan Program (HOME-ARP), Emergency Solutions Grants (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) funds to assist the most vulnerable populations in our community including homeless and low/moderate income housing needs. CDBG, CDBG-CV, HOME-ARP and ESG funds help prevent homelessness and assist those that are already homeless with shelter and supportive services. HOPWA funding addresses affordable housing needs faced by those struggling with an HIV/AIDS diagnosis. HOME, CDBG, CDBG-CV, CDBG-DR and 108 Loan funds are used to build rental housing, help with down payments and rehabilitate homes for low- and moderate-income persons/families in Detroit. HOME funds will be used primarily for Rental Housing projects. Additionally, the City received in FY20, a \$30M Choice Neighborhoods Implementation grant to support a neighborhood transformation plan in the Greater Corktown, as well as a supplemental \$5M grant to address increased costs. The majority of this grant will go towards the development of affordable and mixed income housing in this target area.

HRD funds the 0% Interest Home Repair Loan Program with CDBG funds, providing loans up to \$25,000 to assist Detroit homeowners with home repairs, these funds leverage private investment that provides 50% of the loan capital on each project. HRD also funds the Senior Emergency Home Repair Program with CDBG. This program serves low income seniors who own and occupy their home with emergency repair needs such as roofs, furnaces and hot water heaters. In addition, the City of Detroit provides matching funds from CDBG for multiple Lead Hazard Reduction Programs serving low-to-moderate income households with children under the age of 6. CDBG is also used to provide emergency type repairs on the properties receiving lead hazard reduction services in order to protect the investment made to make the homes lead safe.

In 2018, the City began receiving between \$1.2 and \$1.5 million annually from the Michigan Department of Health and Human Services (MDHHS) through the Medicaid Children's Health Insurance Program (CHIP). The goal of the program is to serve between 20 and 30 units annually with lead-based paint hazard reduction in sixteen of the City's zip codes.

In January 2020, the City of Detroit was awarded \$9.7 million from HUD's Office of Lead Hazard Control and Healthy Homes (OLHCHH) High Impact Neighborhood Grant to target 4 contiguous census tracts in Southwest Detroit (48209 zip code), this program has since expanded to 3 zip codes in Southwest Detroit (48209, 48210 and 48217). The goal is to eliminate lead-based paint hazards in single family and multi-family units, both owner- and tenant-occupied. The City has completed 266 units to date and expects to assist a total of 277 units prior to grant close-out in August 2025.

The City was awarded a Healthy Home Production (HHP) grant from the OLHCHH in April 2022 for \$2M. The funding is primarily used to address lead hazards in the homes of eligible 0% Interest Home Repair Loan Program participants or to address deferral reasons for otherwise eligible weatherization clients. To date, 89 of the 125 unit goal have been completed, remaining units will be completed prior to grant close-out in January 2026.

The City received \$5.65M from OLHCHH in December 2022 to address lead hazards and healthy homes hazards in 150 units across 16 target zip codes. To date 40 units have been completed, with an additional 85 units approved and, in the pipeline, to be completed.

A FY24 Lead Hazard Reduction grant was awarded to Detroit, with a Period of Performance beginning March 1, 2025 and going through March 1, 2029. The goal of the grant is to assist 172 units across 16 target zip codes with the highest rate of elevated blood lead levels. Staff are working on start-up activities including environmental review, budget set-up, drafting policies and procedures, workplan and benchmarks therefore no units have been completed to date.

In FY 2025-2026 the City will use a clear and consistent application process to evaluate and select housing rehabilitation and new construction projects to meet the established goals for affordable housing development and preservation established in the forthcoming Affordable Housing Strategy. HRD will continue to utilize the Targeted Multifamily Housing Areas Map to assist in making 2025-2026 Affordable Housing NOFA investment decisions. The City will seek to leverage HOME, HOME-ARP, CDBG, CDBG-CV, CDBG-DR and other local funds with other funding sources such as Low-Income Housing Tax Credits, Historic Tax Credits, grants and federal and state affordable housing financing programs and support projects that will create and enhance stable communities where other services are provided.

Goals for investing in rehabilitated and newly constructed housing in 2025-2026 include:

Promoting and supporting sustainable, safe, and healthy homes and neighborhoods in the City of Detroit through housing rehabilitation and lead hazard control services

Reducing distressed housing conditions and supporting blight reduction in neighborhoods

Making informed, geographically targeted investment decisions to maximize leverage within developments and neighborhoods.

The preservation of existing multifamily affordable housing, the creation of new multifamily affordable housing for extremely low-income, very low-income, low-income and moderate income households and the renovation of homes for purchase by low-income and moderate income households.

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

One Year Goals for the Number of Households to be Supported	
Homeless	960
Non-Homeless	755
Special-Needs	240
Total	1,955

Table - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	950
The Production of New Units	555
Rehab of Existing Units	445
Acquisition of Existing Units	5
Total	1,955

Table - One Year Goals for Affordable Housing by Support Type

Discussion

1. HOME, CDBG, CDBG-CV, and HOME-ARP: In the 2025-26 fiscal year, HOME, CDBG, CDBG-CV, and HOME-ARP funds will be targeted to strategic areas in the City through a Notice of Funding Availability (NOFA) process. These funds will be prioritized to create or maintain affordability for projects in areas with lower vacancies, strong real estate markets and areas located near local employment districts or transit. New construction will be limited to areas where there is clear demand and long-term housing viability. Under the Housing Rehabilitation and Development Program HRD expects to complete the rehabilitation of 95 units and the construction of another 520 rental units for low-income, very low-income, extremely low-income, and moderate income households. HRD also expects 5 existing units will be acquired by low-income households. The completed projects will include funding from other sources such as Low-

Income Housing Tax Credits, Historic Tax Credits, private equity, grants and local, federal and state affordable housing financing programs to accomplish over 14 times the amount of development activity for each dollar of support provided by the Housing Rehabilitation and Development Program. Also, HRD expects the rehabilitation of an additional 540 units and construction of another 1060 rental units for low-income, very low-income, extremely low-income, and moderate income households will be in process during the 2025-26 fiscal year. These projects will also leverage the other funding sources indicated above to accomplish approximately 10 times the amount of development activity for each dollar of funds invested in supporting the projects.

Community Housing Development Organization (CHDO)

As per the 24 CFR Part 92.300, at least 15 percent of the city's HOME allocation will be reserved for investment only in housing to be owned, developed, or sponsored by a special type of nonprofit called a Community Housing Development Organization (CHDO). A CHDO is a private nonprofit, community-based organization that has staff with the capacity to develop affordable housing for the community it serves. In order to qualify for designation as a CHDO, the organization must meet certain requirements pertaining to their legal status, organizational structure, and capacity and experience.

In order to count towards the 15 percent set-aside, a CHDO must act as the owner, developer, or sponsor of a project that is an eligible set-aside activity. These eligible set-aside activities include: the acquisition and/or rehabilitation of rental housing; new construction of rental housing; acquisition and/or rehabilitation of homebuyer properties; new construction of homebuyer properties; and direct financial assistance to purchasers of HOME-assisted housing that has been developed with HOME funds by the CHDO.

Technical items from our HOME policy document that could be added if required:

When the City provides set-aside funds to a property ownership entity that includes a Community Housing Development Organization with a controlling interest in the general partnership, the written agreement specifies that the CHDO must own the property during development and for a period at least equal to the period of affordability as required per 24 CFR 92.504(c)(3)(x).

When the City is providing set-aside funds to a property ownership entity that includes a Community Housing Development Organization with a controlling interest in the general partnership, the written agreement specifies that the CHDO, or an experienced project manager hired by the CHDO, must oversee all aspects of the development process in accordance with 24 CFR 92.300.

When the CHDO is a "sponsor" and the limited partnership or limited liability company agreement permits removal of the CHDO as general partner or sole managing member of the organization, the written agreement specifies that the CHDO may only be removed as general partner or sole managing member for cause and must be replaced with another CHDO in accordance with 24 CFR 92.300(a)(4)(i).

When the owner, developer or sponsor is a Community Housing Development Organization (CHDO) and is receiving CHDO operating assistance in accordance with 24 CFR 92.208, the agreement includes 24 CFR 92.504(c)(3)(x) and 24 CFR 92.504(c)(6).

When applicable, a provision that the CHDO is expected to receive CHDO set-aside funds for a specific project within 24 months of the date of receiving CHDO operating funds.

When applicable, the terms and conditions upon which the expectation for receiving CHDO set-aside funds is based.

When the owner, developer or sponsor is a Community Housing Development Organization (CHDO) and is receiving project-specific technical assistance and site control loans in accordance with 24 CFR 92.301(a), the agreement should specify as required per 24 CFR 92.504(c)(3)(x) and 24 CFR 92.504(c)(7).

If the owner, developer, or sponsor is a Community Housing Development Organization (CHDO) and is receiving project-specific seed money loans in accordance with 24 CFR 92.301(b) the agreement should specify as required per 24 CFR 92.504(c)(3)(x) and 24 CFR 92.504(c)(7).

2. CDBG Rehabilitation: HRD's 2025-2026 Housing Rehabilitation Program will focus on the following:

- Eliminating lead-based paint hazards
- Repairing deteriorated building components affecting occupant's health and safety

Detroit is making progress against a deteriorating housing stock by repairing homes in both "NRSA" and "Slum and Blight" designated areas. In 2025-26, the City of Detroit's Senior Emergency Home Repair Program will end and a new program focusing on critical home repairs will be rolled out in its place. The new program will assist seniors, but also other residents in the City that are at or below 50% AMI and meet eligibility requirements. In addition to using CDBG funds, the City will leverage private capital investment to increase home repair dollars to residents of the City of Detroit through the 0% Interest Home Repair Loan Program which will end in December 2025. The following details how each program will serve low- and moderate-income homeowners:

- Senior Emergency Home Repair Grant (SEHR) – The program is being replaced with a TBD critical home repair program that is in the design phase. The CDBG funds will be used for emergency repairs in households that are at or below 50% AMI and meet the eligibility requirements. The funds will be used on 6 categories of repairs that affect the immediate health and safety of occupants. An estimated 200 homeowners will be assisted with an approximate expenditure of \$15,000 per home.

0% Interest Home Repair Loan Program (0%IHRLP) - These privately leveraged CDBG funds provide 0% interest home repair loans, to low- and moderate-income homeowners. In addition, those areas designated NRSA areas and Slum and Blight areas will allow residents who are above 80% of AMI to participate in the program. An estimated 30 homes will be assisted with an average CDBG expenditures of \$12,500, with a match of leveraged

private capital, per home. The program will end in December 2025 and HRD is in the early stages of determining what a future program may look like.

3. CDBG Direct Homeownership Assistance Program: Under this pilot program, 54 low-to-moderate income persons in four neighborhoods will be helped with down payment and closing costs assistance, also rehabilitation of 25 units of low- and moderate-income rental units.

4. Lead Hazard Reduction (LHR) Program Grant: HRD has multiple active LHR grants, with a total award of \$14.7M. The programs are at different stages of implementation, however across the three programs HRD anticipates assisting 120 units with lead hazard reduction over the next year. CDBG funds are used to match the two HUD OLHCHH grants as well as provide emergency repairs as needed to ensure the long-term integrity of the lead repairs.

5. Healthy Homes Production (HHP) Grant: HRD was awarded \$2M to address healthy homes hazards, including lead hazard reduction, in most cases these funds will be used in conjunction with the 0%IHLRP and to address weatherization deferral reasons in partnership with the local Community Action Agency. HRD anticipates assisting 25 units over the next year to reach the 125 unit goal through the life of the grant.

AP-60 Public Housing – 91.220(h)

Introduction

The basic need of public housing residents is for decent, safe, affordable housing. DHCs mission is to effectively and efficiently develop, manage, and preserve quality affordable housing. To meet this need, the Detroit Housing Commission (DHC) does the following:

- DHC manages a portfolio that includes Low Income Public Housing (LIPH), mixed-finance developments, Project Based Vouchers (PBV) and Tenant Based Vouchers (TBV).
 - DHC owns and operates 16 family and elderly public housing developments totaling approximately 3,400 units.
 - Administers over 6,000 Housing Choice Vouchers under the Rental Assistance Housing Program.
- Ensures that the resident experience and sustainability at the forefront of its operations and plans.
- Encourages homeownership and self-sufficiency through several different programs, including Jobs Plus, Family Self-Sufficiency and Youth Build.
- Develop opportunities and avenues to provide decent, safe, affordable housing.

1. Actions planned during the next year to address the needs of public housing residents

The DHC is implementing a multi-year plan to address the needs of public housing comprehensively. DHC will continue to execute its multi-pronged plan which includes but is not limited to the following:

Increase Affordable Housing Units. DHC will utilize multiple tools, regulations and relationships to increase the number of available affordable housing units. DHC will continue to fine tune and optimize the currently underway Comprehensive Portfolio Upgrade Plan (CPUP). The CPUP was developed based on the guidance received from Physical Needs Assessments (PNAs), real estate consultancy, HUD guidance, and input from DHC staff and residents. DHC shall under RAD, Section 18, and other repositioning programs, if applicable, consider all of DHC's portfolio including Mixed Finance Developments for financial repositioning. DHC plan to increase affordable housing includes, but is not limited to the following:

1.1.1. **The Faircloth Amendment.** DHC will identify sources of financing to leverage its ability to increase its housing inventory and the total Annual Contributions Contract (ACC) units by reclaiming units through The Faircloth Amendment.

1.1.2. **Project Based Voucher (PBV) Partnerships.** DHC has and will continue to form partnerships with developers to provide PBV rental assistance to further affordable housing in the City of Detroit.

1.1.3. **New Development and Redevelopments.** DHC will continue to reposition its assets under the RAD program. This includes the development of new properties and the redevelopment of existing properties. DHC has begun the first phase of the redevelopment of The Villages of Parkside (160 units) and the development of Gardenview200 (up to 200 units).

- 1.1.4. **Self-development.** DHC will seek self-development as well as new development opportunities to assist with affordable housing initiatives.
- 1.2. **Deconcentration of Poverty.** Continue to use its ability to project base vouchers and Small Area Fair Market Rents to deconcentrate poverty.
- 1.3. **Unit Modernization.** DHC will continue to actively pursue the modernization/rehabilitation of existing public housing units.
- 1.4. **Maintain Compliance with ADA Regulations.** DHC will maintain an emphasis on ADA compliance, ensure a minimum of 2% vision and hearing sensory units and 5% ADA (Sec. 504) units per AMP for both current and future developments.
- 1.5. **Safe and Secure Environments.** DHC will continue to improve security across its entire portfolio through the installation of cameras and the potential further enrollment of additional developments into the Green Light Program.
- 1.6. **Leverage CFP Fund to Improve and Preserve DHC Properties.** DHC will continue to expend and administer CFP funds received to improve and preserve DHC properties. DHC has been and will continue to re-negotiate existing contracts and negotiate new contracts to expediate capital improvement while ensuring high quality deliverables. Although DHC continues to implement a Capital Improvement Plan to improve the quality of life for DHC's residents, it is clear that DHC's annual appropriation of operating subsidy and capital grant funds cannot be relied upon to make significant improvements in the public housing portfolio.
- 1.7. **Foster Development Partnerships.** DHC will continue to explore opportunities to collaborate with governmental agencies, non-profit community organizations, and developers to further the acquisition, development and preservation of affordable housing in the City of Detroit.
 - 1.7.1. **Choice Neighborhood Grants.** DHC in conjunction with the City of Detroit, was awarded a Choice Neighborhood Initiative Planning grant at the Forest Park-Diggs Developments. DHC and its partners are employing this opportunity to secure a Choice Neighborhood Grant and improve the Forest Park-Diggs Development and its surrounding neighborhood.
 - 1.7.2. **Digital Equity.** Rocket Community Fund and the City of Detroit in partnership with DHC will continue to implement the pilot initiative of broadband expansion and digital equity initiative that would expand DHC residents' internet access through technology education and hardware donations as a tool for poverty eradication at Diggs Development.
- 1.8. **Facilitate Home Ownership.** The DHC will assist residents to become homeowners via the training program and vouchers.
- 1.9. **Workforce Development and Training.** DHC, through its HUD-awarded grants, will continue to expand workforce development and job training efforts (see section 2. Below).
- 1.10. **Promote Self-Sufficiency.** DHC, with HUD national staff, has opened and will be expanding the Envision Center to promote family self-sufficiency through educational and economic development.

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

2.1. Increasing Public Housing Residents Involvement in Management

DHC encourages public housing resident to become more involved in management via four main avenues: Resident Councils, Resident Advisory Board, Resident Advocates, and Operational Programs.

Resident Councils – The RSD, in partnership with the League of Women Voters, facilitated the organization of resident councils at each of its developments. This initiative resulted in the election of seven Resident Councils. These councils have drafted their by-laws and are conducting meeting for residents to review and vote on the by-laws. The RSD continues to facilitate the organization of resident councils in the remainder of the DHC developments.

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

Additionally, DHC encourages the public and all its residents to provide feedback on the PHA Annual Plan and the 5-Year Plan during a 45-day comment period and a public hearing. The public hearing is recorded and made available on the DHC website. DHC has created an email address where residents and the general public can email recommendations, questions and comments about the PHA Plan.

Resident Advocates - Resident Advocates are residents who assist the RSD to promote information sharing and provide the PHA and its residents with a forum to communicate, collaborate and participate in the DHC's operations and ongoing programming at each property.

Operational Programs – The DHC Resident Services Department (RSD) has year-round empowerment activities that help residents develop the skills that will tool them to become their own advocates. They encourage resident's self-advocacy and community participation.

2.2. Home Ownership

The DHC has partnered with several HUD certified non-profit organizations to assist in the preparation of residents to become Homeowners. These programs and services include, but are not limited to, credit counseling, basic home maintenance, financial assistance and education. The program used to be exclusive for Housing Choice Voucher holders, but it has been expanded to include LIPH residents.

3. PHA is designated as troubled, describe the way financial assistance will be provided or other assistance

The Detroit Housing Commission is designated as a standard performer in Housing Choice Voucher program, troubled in the public housing program. The public housing designation is tied directly to lowered rent collections, vacancies and late annual recertifications – all as a result of the pandemic. DHC has significantly

reduced both its public housing program and Housing Choice Voucher delinquent recertifications. As of the end of March 2025, HCV has a recertification rate over 97% and the LIPH rate is over 91%. DHC has also onboarded additional staff to assist with key tasks in the Housing Choice Voucher program. Furthermore, DHC has implemented a hybrid management system to leverage the assistance of an RFP sourced vendor with right sizing the mentioned issues. The relationship has resulted in reduced unit preparation times and increased on-time recertifications. DHC continues to move toward the goal of achieving better than standard performer status through concrete efforts in streamlining and improving its business systems, customer service delivery, performance and accountability measures.

AP-65 Homeless & Other Special Needs Activities – 91.220(i)

Introduction

The City of Detroit addresses the needs of its most vulnerable citizens by working with local partners to fund and/or implement CDBG, ESG, CDBG-CV, and other activities to prevent homelessness, provide shelter, and supportive services. Homelessness funding is also used to support the Coordinated Access Model (CAM) and the Homeless Management Information System (HMIS). The CAM system is Detroit's implementation of coordinated entry system, used to assess those experiencing homelessness and match them to resources. HMIS is the database which allows the CoC lead agency, the Homeless Action Network of Detroit, to track program and system performance.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City of Detroit is an active participant in an annual unsheltered Point in Time Count to assess progress toward ending homelessness. An unsheltered count was conducted in 2024. Point in Time data for the 2024 PIT can be found [here](#). Although HUD only requires a count of unsheltered residents experiencing homelessness every other year, Mayor Duggen has mandated that the activity be carried out annually. On January 29, 2025, the Detroit's Unsheltered Homelessness Census was conducted with 101 individuals counted that night and 114 individuals counted the next day. The 2025 count census was 215. Specific to the unsheltered populations, the provider network is focused on:

- Ensuring the safety of residents who are unsheltered during dangerous weather conditions through the funding of street outreach and seasonal warming centers.
- Coordinating access to permanent housing for those unsheltered as a high priority population.
- Connecting each unsheltered chronically homeless individual with a Housing Navigator to ensure individuals move as quickly as possible into permanent housing.
- Utilizing ARPA funding to expand street outreach hours to ensure as close to 24-7 coverage as possible.
- Coordinating with the Detroit Police Department when they encounter an unsheltered household to connect them with street outreach services

During the 2025-2026 year, Detroit will continue to implement the coordinated assessment process that has been in place since early 2014. This coordinated assessment process reaches out to and assesses persons experiencing homelessness and is required per the HEARTH Act. Locally, this system is referred to as the Coordinated Assessment Model (CAM). The intent of CAM is to provide a streamlined process by which people who are homeless or at-risk of homelessness are assessed for the most appropriate intervention to meet their needs, and to be able to access those resources.

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

The City of Detroit increased coordination among outreach providers that are both federally and private funded. This level of collaboration began in 2020 because of COVID-19 and has allowed outreach efforts to provide a more streamlined response to assist both the clients and the providers. In addition, the creation of a chronic by-name list has ensured outreach providers are focused on completing assessments on persons who are unsheltered. These street outreach teams canvass the streets and known locations where unsheltered persons reside. In addition to outreach and engagement, these teams “navigate” the unsheltered to supportive housing by helping them compile the necessary documents to qualify for and be matched to supportive housing.

An essential role of CAM is the referral of households to emergency shelter, Rapid Re-Housing (RRH), and Permanent Supportive Housing (PSH). In 2024, most emergency shelter and permanent supportive housing (PSH) referrals were for single adults. While single adults made up 71% of referrals to shelter, they comprised 73% of referrals to PSH. This is largely because PSH is prioritized for chronically homeless households, and single adults are more likely to be chronically homeless than other population types.

Addressing the emergency shelter and transitional housing needs of homeless persons

Addressing emergency shelter needs

In 2025-2026 Detroit will address the emergency housing needs of homeless persons in the following ways:

- Improving services to those in shelter. The City of Detroit published its Emergency Shelter Community Standards to create uniformed services and guidelines for clients.
- Utilize ARPA funding to allow for a limited number of shelters to operate during the daytime hours while providing increased case management as well as increase the number of shelter beds in the community.
- During the winter additional seasonal emergency shelter programs, referred to as warming centers, open to provide shelter space for persons during the cold weather months. It is estimated there will be three Warming Centers operating during the winter of 2025-2026.
- The City of Detroit will continue to support a highly successful shelter diversion program. This program, coordinated through the shelter access points, identifies persons seeking emergency shelter who could be diverted to an alternative housing setting with mediation support. In 2024, a total of **2,584 households were diverted including:**
 - 49% of total Single Adults

- 40% of adult families presenting
- 7% unaccompanied youth
- 4% parenting youth
- The City will continue placing greater emphasis on housing outcomes for shelter providers through a performance-based NOFA process which integrates performance metrics into scoring.
- Incorporate additional data metrics into future NOFAs

Addressing transitional housing needs

The Continuum of Care has reduced its inventory of transitional housing through strategic reallocations. In 2025-2026, the focus will be providing high quality transitional housing for individuals and families who express a desire to live in these settings and keeping side doors closed to entry to ensure referrals come through the coordinated entry system. The number of referrals (116 households) was similar in 2024; unaccompanied youth are the main population (36% of all referrals).

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

Chronically Homeless Individuals and Families - Permanent Supportive Housing (PSH) provides a permanent rental subsidy and wrap-around services for persons who have significant barriers to housing. The Detroit CoC currently has focused its recent efforts around ensuring that supportive housing is going to the households who need it most, through the creation of a by-name list of those experiencing chronic homelessness and the preferencing of those who are unsheltered, chronically homeless and have a high level of vulnerability as determined by the Full SPDAT for available units of supportive housing.

Veterans and Their Families – To end Veteran homelessness, in Detroit, the Detroit CoC participates in Community Solution’s Built for Zero campaign. The campaign works with communities across the world to reach functional zero. Function zero means the number of Veterans experiencing homelessness at any time does not exceed the number of Veterans Detroit is able to house each month. The Veteran Leadership Committee, a Detroit CoC committee, has targeted its efforts to try to reach functional zero by December 2025. The Detroit CoC uses a by-name list process in order to track Veteran inflow, outflow, and stages in the housing process. Through this process the Detroit CoC has successfully reduced the number of Veterans experiencing homelessness by 14.74% in 2024. In addition, 264 Veterans moved into permanent housing continue to monitor our progress through regular leadership team meetings and by name list meetings. As of March 2024, there were 133 Veterans experiencing homelessness in Detroit. In working on Veteran homelessness, we deploy the following tools to address Veteran needs:

- Supportive Services for Veteran Families (SSVF): SSVF provides both RRH and prevention assistance for veterans (both single veterans and families with Veteran head of households). RRH provides short- to medium-term rental assistance and services to quickly move people from a homeless situation back into housing. Prevention assistance helps persons at-risk of homelessness by using funds to pay

rental or utility arrearages, or security deposits and limited rental assistance going forward for persons who need to move to a new housing unit. There are currently three SSVF programs operating in Detroit.

- HUD-VASH: HUD-VASH is a permanent supportive housing program funded by both HUD and the Veterans Administration (VA). Veterans receive a voucher for housing that is partnered with case management to ensure a successful transition from homelessness to housed.
- Grant Per Diem Transitional Housing (GPDTH): GPDTH beds provide transitional housing assistance to veterans experiencing homelessness, the majority of whom are single males. The intent of the GPDTH programs is to move these individuals into permanent housing. There are 80 GPDTH beds in the City of Detroit.

Families with Children - The needs of families with children will be addressed by:

- A portion of the emergency shelter beds in Detroit will be specifically targeted to families with children
- Families with children will be eligible for ESG-funded RRH and prevention programs
- Linking families to Housing Choice Vouchers provided by Detroit Housing Commission or the Michigan State Housing Development Authority

Unaccompanied Youth - In July 2021, Detroit applied for a grant opportunity known as the Youth Homelessness Demonstration Program (YHDP). YHDP is a federal funding opportunity made available to communities through the Department of Housing and Urban Development (HUD). The ultimate goal of the YHDP is to reduce youth homelessness.

In 2022, a community planning process was carried out, culminating in the completion of Detroit's Coordinated Community Plan (CCP) to end youth homelessness. The CCP acts as a guiding and organizing document in the youth space. The hope is that the awarded communities will build momentum around youth work and then share that experience to help mobilize communities around the country towards the same end – already in Michigan, we have seen several other communities apply for YHDP and look to Detroit for guidance.

The population served by YHDP is youth experiencing homelessness up to age 24. In April of 2023, Detroit's Youth Homelessness Demonstration Program (YHDP) grant period began. The following project types were funded and launched: Permanent Supportive Housing (PSH), Joint Component Transitional Housing Rapid Rehousing (TH-RRH), Rapid Rehousing (RRH) portion of the joint component program, and Crisis Mental Health. This initial round of YHDP funding goes through March of 2025. Three organizations that best represented our collective vision and had extensive experience serving youth are now implementing these new projects. The recipients are Ruth Ellis Center, Permanent Supportive Housing (PSH); MCHS Family of Services and Detroit Phoenix Center, Joint Component Transitional Housing Rapid Rehousing (TH-RRH); and MCHS Family of Services, Crisis Mental Health.

Additionally, improvements have been made to our Coordinated Entry system for youth, with the addition of YHDP-funded youth-specific navigation services. This team, working out of Community and Home Supports (CHS), has helped our community to better meet youth where they are and get them connected to appropriate and necessary services. They also facilitate Detroit's new Youth Case Conferencing space, where providers can share resources and consult on client cases in real-time. Through these efforts, we are confident that we are improving outcomes for youth in our community. Detroit looks forward to evaluating these new projects to get a more complete picture of the impact they are having.

With the YHDP-funded projects off the ground, Detroit has been able to shift focus to the CCP and system-level work to address youth homelessness in our community. This work is being led by the CoC's Committee on Youth Homelessness (CYH). Seated committee members include a representative from the City of Detroit and other stakeholders in the youth space from MDHHS, the education system, the juvenile justice system, the Youth Action Board, the CoC Board, youth service agencies, and more. The CYH is working to make system improvements for youth and have begun exploring the possibility of Direct Cash Transfer programming through both private and public funding channels.

In addition to YHDP-funded projects discussed above, the following funded resources will be available to youth in Detroit:

- There will be at least two emergency shelters that are specifically for youth.
- There will be one transitional housing program specifically targeted to youth that can also serve pregnant/parenting teens.
- There will be an organization that specifically provide drop-in services, counseling, and housing services to homeless youth who identify as LGBTQ.
- There will be two funded project-based Permanent Supportive Housing programs that are open to all but targeted to youth.

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

Providing Financial Assistance - One key strategy for the 2025-2026 year will be to provide short-term leasing assistance and utility and/or rental arrears payments. Detroit will do this by using Emergency Solutions Grant (ESG) funds via RRH.

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

- Foster care
- Mental health care
- Correctional facilities

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

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

Expanding affordable housing opportunities and Landlord Engagement: Detroit works to increase the availability of rental subsidies for low-income individuals and families and expand the use of Housing Choice Vouchers for those at risk of homelessness. When these opportunities are unavailable case managers often attempt to negotiate with landlords to make rents affordable. In 2022, the City of Detroit's Housing and Revitalization Department launched a website called Detroit Home Connect Detroit, a new City service that centralizes available rental units based and can be tailored based on the household's affordability and needs. Households can understand eligibility for rental units by exploring options based on family size, age, and income. This work stemmed from previous landlord engagement initiatives with the ultimate goal of creating a standard landlord engagement and housing program that can significantly increase our landlord pool.

Increased coordination with the local workforce investment board: The City of Detroit is working to help connect programs such as homelessness prevention to provide "warm handoffs" for individuals seeking employment. The homeless system is increasing the level of collaboration through a formal partnership with Detroit at Work that includes a referral process connecting households experiencing homelessness with Detroit at Work at the time of entry into emergency shelter. This immediate referral allows families to quickly connect with employment services as it is often a critical component to ending a household's homelessness.

Discussion

For 2024-2025 year, CDBG funds totaling approximately \$2.5M will support the following homeless activities:

- Street Outreach
- Emergency Shelter Services (Shelter and Essential Services)
- Rapid Re-housing (Financial Assistance/Short Term Case Management, Housing Navigation, Housing Search and Placement & Housing Relocation Stabilization Services)
- Warming Centers
- Coordinated Entry

CDBG homeless funds are also used to meet the 2025-2026 ESG match. ESG regulations require a 100 percent match for every dollar received from HUD. During 2025-2026, CDBG funds will match approximately 90 percent of the 2024 ESG award. The remaining 10 percent match will be met by community organizations

receiving ESG funding. Community organizations traditionally meet the match through in-kind contributions and other award commitments. The match is documented in their contracts.

AP-70 HOPWA Goals – 91.220 (I)(3)

One-year goals for the number of households to be provided housing using HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	0
Tenant-based rental assistance	240
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Short Term Rental, Mortgage, and Utility Assistance	25
Permanent Housing Placement Activities	30
Total	295

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

Introduction:

The City of Detroit is committed to increasing affordable housing opportunities for low- and moderate income households. The City makes efforts to remove policy and market barriers to the development and preservation of affordable housing and to implement policies and programs to proactively encourage affordable housing. Key barriers to affordable housing in Detroit include tax policies, access to capital for affordable housing, and making land available for the development of affordable housing.

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

To ameliorate barriers to affordable housing, the City of Detroit is taking the following actions:

Tax Abatement Streamlining—Due to high tax rates within the City of Detroit, tax abatements including the Payment in Lieu of Taxes (PILOT) are necessary tools to make affordable and mixed income housing feasible. The process for securing tax abatements has been difficult for developers to navigate, so the City of Detroit is developing a tax abatement portal that will launch in 2025 to bring efficiency and transparency to the process.

Access to Capital—The City has collaborated with philanthropic investors and the Local Initiative Support Corporation to develop a private affordable housing loan and equity investment tool to complement and augment public investment in affordable housing. This tool was launched in fall the 2020 and has grown to \$58 million in fund capacity. Additional private funds are currently being sought to recapitalize this fund to continue providing predevelopment funds and low interest loans to affordable housing developers.

Technical Assistance for Preservation—The City has brought on staff to provide assistance to affordable housing owners and to facilitate access to technical assistance to affordable housing owners to assist in the navigation of public funding, private preservation tools, and incentives.

Inclusionary Housing Ordinance—The City continues to administer an inclusionary housing ordinance that requires affordable housing agreements to be executed in conjunction with certain public land sales, tax abatements, or public financing. The ordinance also creates the Affordable Housing Development and Preservation Fund to transfer 40% of public commercial land sale proceeds to affordable housing activities.

Access to Land in Prime Locations for Affordable Housing—The City utilizes several mechanisms to prioritize affordable housing in prime locations. The City is working with philanthropic and nonprofit partners to make significant public and private investments into comprehensive neighborhood and commercial corridor plans. As part of the site selection for catalytic development projects, the City is identifying sites that are conducive to affordable housing and prioritizing development proposals that include affordable units. The City also releases RFPs for publicly owned land and has prioritized parcels that would be competitive in the State of Michigan's Low Income Housing Tax Credit application process.

Streamlining Approval Processes for Affordable Housing—The City is pursuing process changes to reduce time and administrative costs of affordable housing approvals. The first major initiative was to launch a new fast-track affordable housing property tax abatement to eliminate legislative approvals of affordable housing tax reductions when certain affordable housing criteria are met.

Discussion: The City of Detroit consistently engages with affordable housing developers to identify needs and opportunities to improve the process of bringing affordable housing to market. The City of Detroit Housing and Revitalization Department has a Public Private Partnerships division that assists developers navigate city processes from site selection through construction completion including the navigation of permitting, public financing, incentives, site plan review.

AP-85 Other Actions – 91.220(k)

Introduction:

A variety of collaborations, programs and initiatives that encourage job growth and provide services to those in need take place within the City of Detroit. Detroit has been hit hard in past with the Coronavirus pandemic multiple Floods since 2021 and other challenges experienced by older industrial cities. As such, demand for services, programs, and activities supported by federal funds have increased significantly thus the need for coordination, leveraging funds, collaborating on projects, and strategically targeting funds is imperative.

The City of Detroit is focused on addressing obstacles to meet underserved needs by leveraging our funding with other government funding streams and private resources. The City of Detroit will continue to work with our federal, state, and local partners to develop new housing options for poverty level families through such programs as the Affordable Housing Leverage Fund or the Low-Income Housing Tax Credits (LIHTC). In addition, the City will continue to pursue opportunities presented on the federal level and will work with the Michigan State Housing Development Authority to fund LIHTC projects in target areas. The City of Detroit will continue to focus efforts on addressing the needs of households who are experiencing housing insecurity, whether they be homeowners or renters, through a variety of innovative programs.

Home-ARP: The American Rescue Plan (ARP) will provide approximately \$26.5 million and additional \$39K through the HOME Investment Partnerships Program to the City of Detroit. The funding will be used to make targeted, strategic investments in housing and other assistance for people experiencing homelessness. This funding was approved by HUD in late 2022. The City will use HOME-ARP to assist with the development of permanent supportive housing, creation of a non-congregate shelter, supportive services, and non-profit assistance to carry out HOME-ARP activities. As of May 2025, two PSH projects have been constructed using HOME-ARP funding. Benjamin O Davis Veteran Village and The Residences at St. Matthew. Both PSH projects are set to open later in 2025 and will consist of a combined 51 units of PSH.

ARPA Homelessness Prevention: Funding awarded to the City of Detroit through the American Rescue Plan Act (ARPA) supports two strategic initiatives. The first initiative, Prevention, targets households staying with friends or family, often referred to as “doubled up”, who need to leave their housing because it is either overcrowded or unstable. Prevention activities include limited case management which focuses on identifying a new housing unit while connecting clients to mainstream resources and client level financial assistance for security deposits and rental assistance. This funding is leveraged with federal Emergency Solutions Grant (ESG) Prevention program funding that can serve households doubled-up or facing eviction. The ARPA program ramped down in 2024, however prevention services are still supported under ESG funding.

ARPA Homelessness Diversion: The second initiative, Diversion, targets households that are in immediate

need of emergency shelter and contacts the front door of the homeless system, referred to as the Coordinated Assessment Model (CAM). Diversion activities include engagement and financial assistance. Engagement focuses on planning and problem solving to assist clients with either staying in their current unit or moving in with other family or friends (assistance could be monetary or in the form of mediation). The Diversion program may also assist clients with finding a new unit and first month's rent/security deposit.

ARPA Street Outreach: As a component of the larger Detroit Mental Health Co-Response Partnership, ARPA funding has been dedicated to providing individuals with wrap-around services through the deployment of Street Outreach teams. Services provided by these teams include but are not limited to: basic needs assistance (provision of basic needs items such as hygiene products, snacks, water and blankets), housing navigation assistance (connection to Coordinated Entry through CAM and other applicable resource navigation), connection to mental health services, assistance with obtaining vital documents, and transportation assistance to emergency shelter.

Due to COVID-19, Emergency Rental Assistance Program (ERAP) was made available through the U.S Department of Treasury to the State of Michigan through the Homeless Action Network of Detroit and directly to the City of Detroit. Emergency rental assistance was available to landlords and their renters who had been financially impacted by the pandemic. This grant provided another level of assistance for households that do not qualify for ESG prevention funds. The total award was approximately \$305 million dollars for program administration, case management and direct financial assistance for rent, utility and internet support. Between March 15, 2021-March 30, 2024, the ERA program approved just over 33,600 applications for a total of \$273.3 million dollars in direct rent and utility assistance.

In situations where renters were losing their home due to nonpayment of taxes, the Right of Refusal program, which was launched in 2018 in pilot form, could be used. Using funds raised by public-private partnership, the City acquires tax foreclosed homes through the City's right of first refusal from Wayne County. These homes are occupied by renters whose landlords failed to pay their property taxes, victims of property scams, those with solvable probate issues, and owners who would have qualified for property tax reductions. Then, the City passed these homes to a nonprofit partner (United Community Housing Coalition) at no additional cost, and UCHC worked with the individual renters and homeowners, allowing them to acquire the property with monthly payments set at an affordable rate. Funds collected will be held by UCHC for use in future purchases. Since the program's inception, 1,157 households have participated in Make it Home.

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

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

Housing Services

At the end of September 2022, no protections remained in place through state or federal interventions to assist renters still dealing with financial and health challenges related to housing emergencies. The City of Detroit aims to establish a program to prevent Detroiters from experiencing homelessness that were previously being served by Covid-19 resources. As part of the 7-point, 203 million dollar affordable housing plan, the American Rescue Plan (ARP) will provide approximately \$20 million to the new Detroit Housing Services Office (DHS) in the Housing & Revitalization Department. The Detroit Housing Services Office is structured to meet a range of housing relocation needs faced by residents and tenants through an internal continuum of services – as a participant’s housing needs change, so does the type of services available to them within the program.

A hotline will offer assistance for those looking to avoid housing displacement, emergency response for those facing immediate homelessness, and connections to additional housing resources. Residents eligible for case management services will receive 1:1 case management and housing navigation support to gain permanent housing. The target goal is to place 2,000 residents in permanent housing at the conclusion of ARP funding.

Actions planned to foster and maintain affordable housing

The City of Detroit plans the following actions to foster and maintain affordable housing and advance the City’s 2025-2030 goals of developing 3,000 units and preserving 10,000 units of affordable housing: (1) Direct investments to affordable housing development and preservation, including deployment of federal and local affordable housing subsidies through a bi-annual Notice of Funding Availability process; (2) Remove process barriers and risks to affordable housing production by streamlining administrative and legislative approvals and facilitating access to public land; and (3) Provide technical assistance and other supports to affordable housing developers to navigate the development process and build capacity, including emerging local developers and non-profit developers.

Actions planned to reduce lead-based paint hazards

The 2019 American Community Survey (ACS), reports that approximately 89% of Detroit's occupied housing units were built before 1978, with 29% built before 1940. Given the age of the City of Detroit's housing stock, there is significant concern of lead-based paint hazards in residential units. The City of Detroit, through its Housing & Revitalization Department (HRD), is committed to seeking funding for reducing lead hazards and providing prevention information and educational awareness on the various learning disabilities and other significant health issues among children living in affected homes.

Through HUD’s Office of Lead Hazard Control and Healthy Homes (OLHCHH), funds are competitively awarded to help units of local government make homes lead safe. These funds are used in conjunction with CDBG home repair dollars to identify and remediate lead-based paint hazards in privately owned rental or owner-occupied housing. In addition, these OLHCHH grants will also identify and address, where feasible, other health and safety issues by performing a Healthy Homes Assessment.

HRD has multiple active LHR grants, with a total award of \$16.65M. The programs are at different stages of implementation, however across the three programs HRD anticipates assisting 150 units with lead hazard

reduction over the next year. CDBG funds are used to match the two HUD OLHCHH grants as well as provide emergency repairs as needed to ensure the long-term integrity of the lead repairs.

HRD was awarded \$2M to address healthy homes hazards, including lead hazard reduction, in the majority of cases these funds will be used in conjunction with the 0%IRHP. HRD anticipates assisting 75 units over the next year and 125 units throughout the life of the grant.

Actions planned to reduce the number of poverty-level families

Housing, education, transportation, and job opportunities are all important aspects of Detroit's anti-poverty strategy. Housing: See Affordable Housing section AP 55 for details on HRD's efforts to reduce the number of poverty level families by making decent, safe, and affordable housing available for those in need. For households experiencing homelessness, 1,062 referrals were made in 2024 to either Rapid Re-Housing (440) or Permanent Supportive Housing (622) according to the Homeless Action Network of Detroit. These programs provide subsidized rental assistance along with case management to assist households with increasing their self-sufficiency and increasing their income.

Education:

Educational attainment is one key to bringing individuals out of poverty. According to the winter 2015, Michigan Economic and Workforce Indicators and Insights, "The effects of increased levels of education attainment are evident when looking at the labor force participation and unemployment rates for the population 25 and over. There is a clear negative relationship between educational attainment and the jobless rate. It is also apparent that additional education enhances workforce participation." The Detroit Public Schools Community District approved a Community Education Commission, which will grade public schools and provide information to parents to help improve the district's overall performance. While there is still much work to do, teacher vacancies in the district have been reduced by more than half, and salaries have increased by more than \$5,000 annually. In addition, the Detroit Promise Scholarship program offers Detroit High School graduates a tuition-free path to trade, two-year and four-year credentials at 26 Michigan colleges/universities. CDBG funding for educational programs continues to be a city priority. For FY 2025-26, CDBG Neighborhood Opportunity Fund will support approximately \$1.1 million in funding educational programs.

Transportation:

Transportation is the key to all Detroiters being able to access employment opportunities. Over the last four years, DDOT has invested in new buses and routes, and improved operations. Transportation priorities include: Increasing economic opportunity and reducing poverty by delivering a high-quality transit service and providing more ways for people to access every neighborhood in Detroit; Improving public safety by reducing traffic injuries and fatalities and making everyone feel safe walking, biking, and taking transit to their destination; Introducing the new DDOT Bus Tracker where individuals can track their bus via text message or by going to myddotbus.com on an internet browser; Strengthening city functionality by bringing our infrastructure and operations into a state of good repair and having the right systems in place to deliver on our promises. The DDOT will make reasonable accommodations for individuals with disabilities to fully use

the transit services.

Employment:

A significant cause of poverty is the lack of employment opportunities for residents. Detroit at Work is a program that was launched in February 2017. This program is a collaboration with the Detroit Employment Solutions Corporation (DESC), who is the appointed workforce development agency for the City. DESC is a nonprofit agency dedicated to training and opportunities to match Detroiters to jobs. Detroit at Work is a single point of entry to jobs and training opportunities within the City of Detroit. Some highlights of recent workforce initiatives include: Grow Detroit's Young Talent (GDYT), a program that provides youth (ages 14-24) with both soft and hard skills and then matches them with over 200 employers to provide on-the-job training between July and September.

Actions planned to develop institutional structure

The City of Detroit has developed its institutional structure by establishing partnerships with City departments and agencies, public housing, private institutions, non-profit organizations and continuum of care providers. When implementing the plan and to carry-help the objectives in the Consolidated Plan and Annual Action Plan, the City will continue to coordinate and collaborate with its partners. Included in the partnership structure are the expertise of contractors, service providers and others with the specialized knowledge needed to carry out programs and projects. The Consolidated Plan programs are usually accomplished through (carry out) the Housing and Revitalization Department, contracts with subrecipients, Community Based Development Organizations (CBDO), HOME program developers, Community Housing Development Organizations (CHDOs) and other City departments. Our entity partners, entity type and roles are described: City Departments and Agencies: Planning & Development Department (P&DD) is responsible for Historic designation advisory, historic review clearances, planning studies, site plan review, city master plan, zoning district boundaries approvals, and development plans; Detroit Building Authority (DBA) is responsible for managing large scale capital construction projects and space planning of city-owned facilities, and a portfolio of commercial real estate properties; Detroit Land Bank Authority is responsible for returning the city's blighted and vacant properties to productive use by utilizing a variety of sales programs to make homeownership and land purchases accessible to Detroiters; Department of Neighborhoods is responsible for helping residents form block clubs and community associations; drive community engagement on neighborhood planning projects and other initiatives; resolve citizens' complaints; and educate residents on a broad range of City programs and policies; Detroit Health Department is responsible for providing programs/services, through The Housing Opportunities for Persons with AIDS (HOPWA) grant programs; and Tenant Based Rental Assistance (TBRA) and Housing Supportive Services; Building Safety Engineering and Environmental Department (BSEED) is responsible for lead hazard inspection for a rental property; rental housing compliance; Detroit Department of Transportation (DDOT) is responsible for public transportation operator of city bus service in Detroit; and Wayne Metropolitan Community Action Agency (WMCAA) is responsible for homeless programs and services: WMCAA provides essential services, and community resources to low and moderate income individuals and families throughout all of Wayne County. The services include the following: Housing placement, moving, utility assistance, health care, weatherization,

transportation and food. Public Housing Authority (PHA): Detroit Housing Commission (DHC) is responsible for public housing. The DHC manages the following program: Section 8 Low-income public housing. Redevelopment Authority: Detroit Economic Growth Corp is responsible for economic development. Private Industry: Local Initiatives Support Corporation (LICS) is responsible for the Zero Percent Home Repair Loan (homeowners program). In addition, to investing in affordable housing, growing businesses, safer streets, high-quality education and programs that connect people with financial opportunity. Continuum of Care: Homeless Action Network of Detroit (HAND) is responsible for homelessness, non-homeless special needs, public housing, rental and public services. Non-profit organizations: Fair Housing Center of Metropolitan Detroit is responsible for housing discrimination public services; Detroit Area of Aging Agency (DAAA) is responsible for senior public services and homelessness; Detroit Housing Coalition is responsible for foreclosure prevention public services and homelessness.

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

The Detroit Housing Commission (DHC) will continue in its efforts to create more affordable housing opportunities in the City of Detroit.

The City of Detroit also supports DHC's efforts to create a more robust array of supportive and social services to its residents in both the public housing and Housing Choice Voucher programs. Through MOUs and other joint initiatives DHC and the City of Detroit have and will continue to address the housing needs of Detroiters.

The City of Detroit and DHC will utilize its partnership as follows:

1. Utilize the EnVision Center as a hub for both public and private partners to provide resources for the benefit of individuals and families, residing in federally assisted housing, interested in achieving economic independence through better educational opportunities and employment training. The EnVision center will continue to be a hub for economic empowerment, character leadership, educational advancement, and health & wellness.
2. Expand the current DHC referral network by negotiating new relationships while maintaining current relationships. DHC collaborates with over 100 community partners that connect residents to a multitude of service providers that address many of its residents' needs.
3. Continue to partner with the City of Detroit to secure financial resources to increase and improve the quality of affordable housing, for example Choice Neighborhood Grants.
4. Maintain current Memoranda of Understanding (MOUs) with the City of Detroit that provide homeless families and families with children that have tested positive for elevated lead blood levels with housing in its Low-Income Public Housing Program and/or vouchers.
5. The City of Detroit will continue to incorporate DHC in its community improvement initiatives like the Greater Warren / Conner Framework Neighborhood initiative.
6. Utilize HUD grant and private partnership to expand its programs like Resident Opportunities Self-Sufficiency (ROSS), Family Self-Sufficiency (FSS), and Jobs Plus. For example, YouthBuild participants are modernizing DHC apartment while learning construction skills provided by one of the private

partners.

7. Protect foster care youth against homelessness through an MOU with the Michigan state Housing and Development Agency (MSHDA), to provide housing for youth aging out of foster care or under family unification requirements.
8. DHC will partner with landlords to utilize Small Area Fair Market Rents to house residents in neighborhoods that better suite their family needs.
9. DHC will increase the capacity of the social services division through vista volunteers.
10. DHC will expand the Family Self-Sufficiency Program and employment/training opportunities under Section 3. DHC is partnering with Poverty Solutions, Inc. (University of Michigan) to explore ways to incent residents/voucher holders to get into and remain in the world of work.

Discussion:

Pursuant to its authority under the Fair Housing Act, HUD has long directed program participants to undertake an assessment of fair housing issues. As the Department works to foster effective fair housing planning, goal setting, strategies, and actions, it recognizes that the people who are most familiar with fair housing issues in cities, counties, and states are the people who live there and deal with these issues on a daily basis.

The City of Detroit will continue to combat issues with impediments to Fair Housing from the assessment by efforts from the Civil Rights, Inclusion and Opportunity Department's (CRIO) complaint procedures. CRIO will assist in meeting the City of Detroit statutory obligation to affirmatively further the purposes and policies of the Fair Housing Act. In addition, the CDBG will continue to fund several other non-profit groups for the purposes of fair housing.

Program Specific Requirements

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

Introduction:

HRD will continue to do its best to strategically invest funding from the four federally funded programs. CDBG funds will be used to benefit low-and-moderate income persons through various social and economic opportunities, and housing homeownership assistance programs. HOME funds will be used to provide affordable housing including new construction of multi-family rental units. ESG funds will be used for emergency shelters, warming centers, homeless prevention, rapid re-housing and street outreach. Finally, HOPWA program funds will be used to serve homeless and non-homeless persons residents infected and/or affected by HIV/AIDS through Tenant based Rental Assistance (TBRA) while providing information and supportive services.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income.	81%

Specify the year(s) covered that include this Annual Action Plan. 1 year - 2025

300

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

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

The City investments of HOME funds will only take the forms listed in Section 92.205.

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

The City of Detroit will not use any new proceeds from the HOME Investment Partnership Program for homebuyer assistance, new construction of owner-occupied single-family homes, or rehab of owner-occupied single-family homes. The City of Detroit will use proceeds from the Community Development Block Grant for homebuyer assistance. Proceeds from the HOME Investment Partnership Program will continue to be used for the construction and rehab of rental housing in the City of Detroit and will continue to follow the requirements as stated in 24 CFR 92.

In Detroit, there are several existing rental developments comprised of single-family scatter-site units that were originally assisted with HOME proceeds along with Low Income Housing Tax Credits (LIHTC). Several of these developments are past their 15-year LIHTC initial compliance period and are now eligible (through the LIHTC program) for units to be converted from rental to homeownership. For HOME-assisted developments that are eligible for homebuyer conversion, the original owner of the rental development may submit a Homebuyer Plan for review and approval by the City. The Homebuyer plan must align with the resale requirements per 24 CFR 92.254(a)(5)(i) and as detailed below. If approved, the City may amend the original development & loan agreement and related documents to allow for sales to existing tenants as individual homebuyers. This will give the current low-income household, who initially occupied the home as a rental unit, the opportunity to be a homeowner.

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

The Homebuyer Plan must meet the following requirements:

- Resident option: Residents have the option of purchasing the home they live in, but they can also continue to rent. They may not be compelled to buy the home, nor may they be compelled to leave if they cannot afford to buy.
- Low-income qualification: Homebuyers must qualify as a low-income family (per 24 CFR 92) and the

home must be the principal residence of the qualifying family throughout the period of affordability, as stated in 24 CFR 92.254(a)(3). Prior to issuing approval to close, the City will confirm that each buyer can afford to purchase their home and qualifies for financing as needed based on the structure of the sale.

- Affordable housing restriction: Homes sold to low-income homebuyers will continue to be encumbered by an affordable housing restriction throughout the original period of affordability, as defined in 24 CFR 92.255. This affordable housing restriction will be signed by the homebuyer and recorded with the Wayne County Register of Deeds and will comply with the Resale Requirements as defined in 24 CFR 92.254(a)(5)(i). The period of affordability will be equal to the remaining period of affordability if the homes were to remain as rental, per 24 CFR 92.255

- Initial Purchase price: The purchase price for original homebuyers (the first buyers to purchase from the rental development) will be affordable to a reasonable range of low-income homebuyers, meaning the maximum purchase price will be the lesser of: (1) the appraised value of the home or a similar home within the same original rental development, conducted within 6 months of purchase; (2) 95% of the median purchase price for Wayne County according to HUD's published HOME homeownership value limits; or (3) a purchase price set through a Homebuyer Plan submitted to and approved by the City by the original owner of the rental housing development. This purchase price must be based on analysis demonstrating that at least 50% of the residents of the original rental development at time of amendment have sufficient income to support monthly housing payments. This plan must account for estimated insurance, property taxes and utilities. This means their monthly housing payments, which must be calculated to include mortgage, estimated insurance, property taxes and utilities that homebuyers are expected to pay, should not exceed 30% of the household's gross monthly income.
 - o For example, if the median household income in a development is \$24,000, this places an upper limit of monthly housing costs for homebuyers would be \$600/month. If estimated insurance, taxes and utilities total \$270/month, the seller would have to demonstrate that mortgage products are available to residents that would limit monthly payments to \$330, and that home prices would not exceed the supportable mortgage plus any down payment assistance made available.

- Subsequent sales price: Homebuyers may elect to transfer the homes to another household that is qualified as low-income during the period of affordability. During the period of affordability, the maximum purchase price for subsequent buyers will be the greater of: (1) the purchase price for the original low-income homebuyer or (2) a purchase price set affordably for a low-income household at 80% of AMI for their household size based on the following assumptions:
 - o 30% of monthly gross income for housing costs and 70% of housing costs for mortgage payments
 - o 5% down payment
 - o 30-year fixed FHA interest rates at time of sale.

Following the expiration of the period of affordability, the sale price will be unrestricted. This policy ensures that original low-income homebuyers looking to sell to a subsequent buyer have the opportunity to receive a fair return on investment, defined as receiving no less than what they paid for the home plus any capital improvements, both during and following the period of affordability.

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

The City of Detroit may use HOME funds to refinance existing debt secured by multifamily housing if the following conditions are met:

1. The refinancing is part of a rehabilitation of the property that includes a minimum rehabilitation of \$5,000 per unit and the refinancing is part of a recapitalization of the project.
2. The owner can demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met and the project is financially feasible for the length of the affordability period; and it is feasible the project will be able to serve the targeted population for the length of the affordability period.
3. The owner must demonstrate the new investment of HOME funds is being made to preserve the current affordability of units, create additional affordable units, or both.
4. The owner must enter into an affordability agreement for a period that is equal to or greater than the term of the HOME loan but not less than 15 years, recorded as a covenant running with the land that either preserves affordability, or creates new affordable units.
5. The property must be in the City of Detroit.
6. HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including the CDBG program.

5. **If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).**

Not Applicable.

6. **If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).**

Not Applicable.

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

Not Applicable.

**Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)**

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

Written standard for providing ESG were formalized and approved by the CoC board in 2016. The written

standards were updated due to system changes. These updates were completed and published in 2018 and will continue to be updated by the CoC Performance Evaluation Committee and approved by the CoC board. (See attached policies and procedure manual for ESG).

To align with best practices and the homeless response system's commitment to data informed decision-making, the City moved to performance-based contracts starting in the 2019-20 contract year. Program outcomes are used to make funding decisions to ensure high quality services are delivered to those most in need. Hence, outcomes on established performance measures will impact funding allocations. The City worked with agencies to implement this plan beginning in 2019.

The following illustrates the methodology used for establishing performance benchmarks.

- Evaluating Benchmark Progress and Goals NOFA-
 - The City of Detroit regularly evaluates performance toward meeting expected benchmark goals.
 - Progress towards achieving benchmarks is reviewed and scored as part of the NOFA process.
- Review of Baseline Performance-
 - Examination and assessment of Detroit's CoC current performance is reviewed to understand success and evaluate effectiveness.
- Develop Goals and Performance Benchmarks-
 - Based on baselines, benchmarks are developed with the goal to drive improved program performance.
 - The goals are designed to help improve performance outcomes.

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

The Detroit Continuum of Care (CoC) had created a coordinated assessment system that assesses all clients seeking services with a standardized assessment tool (the VI-SPDAT) and ensures coordinated entry into shelter programs and prioritization of clients for housing and services on the basis of their assessment score. The Coordinated Entry System, or CAM, as it is known locally, utilizes a hybrid model. Households experiencing homelessness can either call the CAM call center or go to one of three in person access sites.

The Homeless Action Network of Detroit was selected to serve as the CAM Lead Agency as well as provide the back-office, data focused, functions of CAM. Wayne Metro Community Action Agency was selected by the Detroit CoC to provide resident-facing CAM services to households, including operating the call center and in person access points. Community and Home continued to provide navigation services to households in emergency shelters. These three agencies provide unique but interdependent services that make up Detroit's CAM system.

As of May 2025, households experiencing homelessness can access in-person CAM services at the NOAH Project, 23 E. Adams, Detroit MI 48226 and Cass Community Social Services, 11850 Woodrow Wilson St.

Veterans experiencing homelessness can go to the Detroit Veterans Administration, 4646 John R, Red Tower, 2nd Floor, Detroit, MI 48201. Outside of the in-person access points, households can call 1-866-313-2520 to be connected with CAM. This call center is combined with other funding in order to offer a plethora of housing related resources to the community in addition to CAM.

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

The City of Detroit uses a NOFA process each year to select the best qualified non-profit organizations to implement ESG activities. Since 2019-2020, the City of Detroit combined the NOFA and contracting process for ESG and CDBG which streamlined the process for both city staff and subrecipients. The 2025-2026 Homelessness Solutions NOFA, for ESG funding, was released on January 21, 2025, and closed on February 24, 2025. The applications were scored by a review team and an average of the scores are calculated to produce the final score for each application. Funding recommendations are made to Detroit City Council, who votes to approve the recommendations.

The City continues to use its CDBG funds as part of a match for the annual ESG allocation. Organizations are required to provide proof of any required match at the time of grant award and close-out. Matching sources may include cash contributions expended for allowable costs, and non-cash contributions including, but not limited to, the value of any real property, equipment, goods, or services provided that the costs would have been allowable.

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

The City of Detroit adheres to homeless participation requirements at 24 CFR 576.405(a). The City of Detroit has required that all sub grantee organizations appoint one homeless or formerly homeless individual to its board of directors to be considered for ESG funding. Our purpose is to ensure the voices of those who have experienced homelessness are integrated into the service work of these agencies. Proof of this appointment is required to be included as an attachment with NOFA submissions. In addition, the Detroit Continuum of Care has a Detroit Advisor's Group that is comprised of individuals with lived experience. This group reviews and provides feedback on system changes, including access to ESG funded programs.

5. Describe performance standards for evaluating ESG.

ESG performance is evaluated from both a programmatic and financial perspective. Organizations are assessed for risk prior to grant award, and financial and programmatic monitoring is integrated into the work of the contract managers. We ensure the performance of organizations both through the utilization of HMIS data and the qualitative information obtained through file review. The City of Detroit has finalized ESG Policies and Procedures, which further detail performance expectations to increase accountability. During the 2025-26 NOFA, the City defined performance measures, established baselines, and benchmarks for organizations to meet during the coming year. This work has continued in future funding applications.

Performance measures are used during the NOFA process to evaluate an organization's ability to carry out ESG programs.

Housing Opportunities for Persons with Aids (HOPWA)

Identify the method of selecting project sponsors and describe the one-year goals for HOPWA funded projects

1. Selection of Contractors

The City of Detroit is the grantee for the HOPWA Program and as such provides all grant administrative functions. The City of Detroit Health Department (DHD), which administers the program, follows the City's procurement policy from the Office of Contracting and Procurement. While DHD is the program operator, there is still a need for a contractor that can write issue rental assistance and other recurring costs on a reimbursement basis. This contractor is not a Project Sponsor and therefore, makes no decisions about program design or eligibility. A summary of the procurement process for selecting such contractors are as follows:

A Request for Proposal (RFP) application is issued for potential contractors based on the contract cycle. The RFP is open and available to the community, including grassroots, faith-based and all other community organizations for proposal bids. All RFP's are advertised on the City and community websites, local and minority newspapers such as the Detroit News/Free Press and discussed at coalition and committee meetings. The evaluation and scoring for the proposals are based on the City's procurement policies and procedures.

Contractors are reviewed and evaluated on their performance. This evaluation may impact their ability to qualify for future RFPs.

2. Goals for HOPWA funded projects

HOPWA's goals are based on community need and prior year activities.

GOAL: "To connect HIV positive Detroit and Wayne County residence with Tenant Based Rental Assistance (TBRA), Housing Information and Referral Services, Short-Term Rent Mortgage and Utility Assistance, Permanent Housing Placement (Security Deposits), and Supportive Services.

3. Tenant Based Rental Assistance (TBRA)

HOPWA's one-year goal under TBRA is to assist 240 eligible individuals and their beneficiaries with Housing assistance which includes subsidized rental payments, case management services, and linkages to supportive services.

4. Supportive Services

Supportive services, characterized as a key activity to help persons with HIV/AIDS achieve housing stability and as such are an interconnected component of the HOPWA program. HOPWA rental assistance is not intended to provide “stand alone” rental subsidy but comes with the requirement that an appropriate level of supportive services, designed to meet the program’s objectives of maintaining housing stability, avoiding homelessness, and assuring access to care and support are included.

Clients enrolled in HOPWA have individualized Case Plans that include an assessment of their housing needs as well as the supportive services for them to become and remain stable in housing. This plan is updated regularly during quarterly visits with the client’s assigned Housing Coordinator.

5. Short-Term Rent, Mortgage and Utility (STRMU)

As STRMU is a “need-based” program; applicants must submit evidence that they do not have the resources to meet rent, mortgage or utility payments and, in the absence of this assistance, would be at risk of homelessness. The amount of assistance is determined by client’s household income and monthly household expenses and HUD’s recommended 30% of income toward living costs. HOPWA's goal under STRMU is to assist 25 eligible households with STRMU assistance. This assistance will operate on a fiscal year (FY) round, July 1-June 30. Clients cannot receive assistance more than 147 days/21 weeks, within the registered FY Year.

6. Permanent Housing Placement

HOPWA's Goal is to assist 30 unduplicated clients with Permanent Housing Placement activities: Security Deposit, 1st Month's Rent, Last Month’s Rent, application fees, credit check expenses, and one-time utility connection fees.

7. Housing Information and Referral

Housing Information services is a key HOPWA activity which includes, but not limited to, counseling, information, and referral services to assist enrolled clients to locate, and maintain housing. The program expects to serve 292 people with this activity.

APPENDIX:

**FY 2025-26
ACTION PLAN
BUDGET**

2024-25 HUD Annual Action Plan Budgeted Activities

Program Name	Activity	National Objective	Matrix Code	Sponsor Name (Activity Name)	Recommended Amount	Project Description	Site Address	Start Date	Completion Date	Objective	Outcome	Specific Objectives	Accomplishment Type	Proposed Accomplishment	Outcome Indicators	Priority Need	City wide	NRSA	Slum Blight	City Districts
CDBG	AD/PLN	N/A	21A	Administration (Direct)	3,211,838.00	Administration - Direct Staff costs related to HUD community development and program management.	2 Woodward CAYMC, Detroit, MI 48226	7/1/2024	6/30/2025	N/A	N/A	N/A	Other	N/A	N/A	Planning/Administration	N/A	N/A	N/A	N/A
CDBG	AD/PLN	N/A	21A	Development & Investments - PFR/PI Team	391,034.00	Direct Staffing Costs related to Development & Investments PFR/PI	3 Woodward CAYMC, Detroit, MI 48226	7/1/2024	6/30/2025	NA	N/A	N/A	Other	N/A	N/A	Planning/Administration	N/A	N/A	N/A	N/A
CDBG	AD/PLN	N/A	20	Eight Mile Blvd	25,000.00	Planning activities with other local governments bordering the City of Detroit along Eight Mile Boulevard.	2 Woodward CAYMC, Detroit, MI 48226	7/1/2024	6/30/2025	N/A	N/A	N/A	Other	N/A	N/A	Planning/Administration	N/A	N/A	N/A	N/A
CDBG	AD/PLN	N/A	21A	Neighborhood & Housing Svcs - Homeless Supportive Housing (Direct)	757,284.00	Direct - Staffing Costs related to CDBG/NOF and Homeless initiatives	2 Woodward CAYMC, Detroit, MI 48226	7/1/2024	6/30/2025	NA	N/A	N/A	Other	N/A	N/A	Planning/Administration	N/A	N/A	N/A	N/A
CDBG	AD/PLN	N/A	21A	Neighborhood & Housing Svcs - NOF & CDBG Initiatives (Direct)	984,004.00	Direct Staffing Costs related to NOF & CDBG Initiatives	2 Woodward CAYMC, Detroit, MI 48226	7/1/2024	6/30/2025	NA	N/A	N/A	Other	N/A	N/A	Planning/Administration	N/A	N/A	N/A	N/A
CDBG	AD/PLN	N/A	21A	Programmatic Operations - Policy Implementation Staffing	1,040,947.00	Direct Staffing costs for Policy and Implementation Division	2 Woodward CAYMC, Detroit, MI 48226	7/1/2024	6/30/2025	NA	N/A	N/A	Other	N/A	N/A	Planning/Administration	N/A	N/A	N/A	N/A
CDBG	AD/PLN	N/A	21A	Programmatic Operations - Special Projects	141,735.00	Direct Staffing Costs related to Special Projects	3 Woodward CAYMC, Detroit, MI 48226	7/1/2024	6/30/2025	NA	N/A	N/A	Other	N/A	N/A	Planning/Administration	N/A	N/A	N/A	N/A
					6,551,842.00	Subtotal AD/PLN														
CDBG	HR	LMH	14I	CDBG Lead Remediation (Lead Grant Match)	4,000,000.00	CDBG Lead remediation (also matches the Lead grant).	2 Woodward CAYMC, Detroit, MI 48226	7/1/2024	6/30/2025	Decent Housing	Availability/A	Improve the quality of owner housing	Housing Units	60	Homeowner Housing Rehabilitated	Owner Occupied Housing	ALL	ALL	ALL	ALL
CDBG	HR	LMH	14A	Conventional Home Repair (Sr)	4,000,000.00	Emergency Home repair for low/moderate income homeowners. City-wide.	2 Woodward CAYMC, Detroit, MI 48226	7/1/2024	6/30/2025	Decent Housing	Availability/A	Improve the quality of owner housing	Housing Units	60	Homeowner Housing Rehabilitated	Owner Occupied Housing	ALL	ALL	ALL	ALL

2024-25 HUD Annual Action Plan Budgeted Activities

Program Name	Activity	National Objective	Matrix Code	Sponsor Name (Activity Name)	Recommended Amount	Project Description	Site Address	Start Date	Completion Date	Objective	Outcome	Specific Objectives	Accomplishment Type	Proposed Accomplishment	Outcome Indicators	Priority Need	City wide	NRSA	Slum Blight	City Districts
CDBG	HR	LMH	14H	Single Family Housing Activity (Direct)	3,829,303.00	Direct staffing Cost related to single-family Housing including Lead	2 Woodward CAYMC, Detroit, MI 48226	7/1/2024	6/30/2025	Decent Housing	Availability/A ccessibility	Improve the quality of owner housing	Other	N/A	N/A	N/A	N/A	N/A	N/A	N/A
					11,829,303.00	Subtotal HR														
CDBG	DVLPT	LMH	14H	Development & Investment - Multi-Family Staffing (Direct)	1,464,302.00	Direct staffing Costs related to Multi-Family Housing	2 Woodward CAYMC, Detroit, MI 48226	7/1/2024	6/30/2025	Decent Housing	Availability/A ccessibility	Improve the quality of owner housing	Other	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CDBG	DVLPT	LMH	14B	Housing Pre Development Rehabilitation (Affordable Housing) (14B)	279,493.50	Pre-development cost for the rehabilitation of multi-family residential publicly/private owned properties for Detroit low and moderate income residents	2 Woodward CAYMC, Detroit, MI 48226	7/1/2024	6/30/2025	Decent Housing	Availability/A ccessibility	Improve the quality of owner housing	Housing Units	25	Homeowner Housing Rehabilitated	Owner Occupied Housing	ALL	ALL	ALL	ALL
CDBG	DVLPT	LMH	14G	Housing Pre Development Rehabilitation Acquisition (Affordable Housing) (14G)	TBD	Pre-development cost involved in the acquisition of housing and rehabilitation of residential publicly/private owned properties for Detroit low and moderate income residents	2 Woodward CAYMC, Detroit, MI 48226	7/1/2024	6/30/2025	Decent Housing	Availability/A ccessibility	Improve the quality of owner housing	Housing Units	25	Homeowner Housing Rehabilitated	Owner Occupied Housing	ALL	ALL	ALL	ALL
CDBG	DVLPT	LMH	12	Housing Pre Development Rehabilitation Acquisition (Affordable Housing)	TBD	Pre-development (New Construction)cost for the rehabilitation of multi-family residential publicly/private owned properties for Detroit low and moderate income residents	2 Woodward CAYMC, Detroit, MI 48226	7/1/2024	6/30/2025	Decent Housing	Availability/A ccessibility	Improve the quality of owner housing	Housing Units	25	Homeowner Housing Rehabilitated	Owner Occupied Housing	ALL	ALL	ALL	ALL
					1,743,795.50	Subtotal Pre-development (Affordable Housing)														
CDBG	NEIGH FAC	LMA	03E	Choice Neighborhood Initiative Grant Match	2,000,000.00	5% grant match requirement of the \$30MM Choice Neighborhood Initiative to provide affordable housing and critical community improvement projects w/in the City's Greater Corktown Neighborhood area.	2 Woodward CAYMC, Detroit, MI 48226	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	Improve quality/quantity of neighborhood facilities for low/mod persons	Public Facilities	1	Public Facility or Infrastructure Activities	Public Facilities				3

2024-25 HUD Annual Action Plan Budgeted Activities

Program Name	Activity	National Objective	Matrix Code	Sponsor Name (Activity Name)	Recommended Amount	Project Description	Site Address	Start Date	Completion Date	Objective	Outcome	Specific Objectives	Accomplishment Type	Proposed Accomplishment	Outcome Indicators	Priority Need	City wide	NRSA	Slum Blight	City Districts	
CDBG	PFR	LMA	03E	Public Facility Rehabilitation	0.00	Reserved for Public Facility Rehabilitation (TBD)	2 Woodward CAYMC, Detroit, MI 48226	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A	Improve quality/quantity of neighborhood facilities for low/mod persons	Public Facilities	1	Public Facility or Infrastructure Activities	Public Facilities	X				
					0.00	Subtotal PFR															
CDBG	PS	LMA	05H	Public Service - Summer Jobs Program including GYDT and Training (NRSA 1-5)	1,500,000.00	Public service program that will provide job training and employment opportunities for "at risk" and other low income youth in selected Neighborhood Revitalization Strategy areas (NRSA) through programs designed to stabilize deteriorated or deteriorating neighborhoods.	2 Woodward CAYMC, Detroit, MI 48226	7/1/2024	6/30/2025	Creating Economic Opportunities	Availability/A	Improve economic opportunities for LMI persons	People	500	Public Service	Public Services	N/A	1 thru 5	N/A	N/A	
CDBG	PS	LMC	05Z	Accounting Aid Society	70,680.00	To provide free tax preparation and counseling assistance to Low/Mod income Detroit households; provides education in financial management.	3031 W. Grand Blvd., New Center One Detroit, MI 48202	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A	Improved Services for low/mod persons	People	11000	Public service activities other than low/moderate income housing benefit	Public Services	X	ALL	ALL	ALL	
CDBG	PS	LMC	05M	Avalon Healing Center	54,143.00	Avalon's acute medical forensic services are free and available 24 hours a day, 7 days a week. Clinicians and advanced practice practitioners provide immediate comprehensive and compassionate care within the first 120 hours following sexual assault. In addition to providing medical forensic exams and post-assault care and support, Avalon offers survivors critical medical care they may otherwise not be receiving.	601 Bagley Street Detroit, MI 48226	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A	Improved Services for low/mod persons	People	225	Public service activities other than low/moderate income housing benefit	Public Services	X				4

2024-25 HUD Annual Action Plan Budgeted Activities

Program Name	Activity	National Objective	Matrix Code	Sponsor Name (Activity Name)	Recommended Amount	Project Description	Site Address	Start Date	Completion Date	Objective	Outcome	Specific Objectives	Accomplishment Type	Proposed Accomplishment	Outcome Indicators	Priority Need	City wide	NRSA	Slum Blight	City Districts
CDBG	PS	LMC	05A	Bridging Communities, Inc	64,143.00	Requesting funds for senior activities such as resource referrals to address unmet basic needs, assistance in obtaining access to supplemental food programs; Navigation assistance with accessing Medicare and Medicaid benefits	6900 McGraw, Detroit, MI 48210	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	Improved Services for low/mod persons	People	450	Public service activities other than low/moderate income housing benefit	Public Services	X	ALL	ALL	5
CDBG	PS	LMC	05H	CAMP Restore	54,143.00	Camp Restore program will provide vocational training, through landscaping and carpentry to at- risk Detroit youth. They will also have program to educate youth on financial literacy.	17100 Chalmers Detroit, MI 48205	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	Improved Services for low/mod persons	People	60	Public service activities other than low/moderate income housing benefit	Public Services	X			4
CDBG	PS	LMC	05L	Carrie Morris Arts dba Detroit Puppet Co.	54,143.00	Serve youth in grades K-8 through 3 weeks of summer activities to participate in Detroit Puppet Company's Youth Performing Arts and Recreation Camp. Camp activities include creative and arts programming and performing arts practices to build skills (professional development, life skills, teamwork, and communication) for students ages 5-12	2221 Carpenter Detroit, MI 48212	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	Improved Services for low/mod persons	People	150	Public service activities other than low/moderate income housing benefit	Public Services	X			3
CDBG	PS	LMC	05M	Cass Community Social Services	54,143.00	Cass Community will provide the three meals per day which comply with USDA dietary standards to 46 LMI residents of our Scott, Travis, and Cass House permanent supportive housing programs. Residents in these three programs have single room occupancy units with shared kitchen and living areas	11745 Rosa Parks Detroit, MI 48206	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	Improved Services for low/mod persons	People	46	Public service activities other than low/moderate income housing benefit	Public Services	X	ALL	ALL	5
CDBG	PS	LMC	05H	Center for Employment Opportunities	64,143.00	CEO program aim to reduce recidivism and improve employment outcomes for people returning home from incarceration CEO provides services that include Workforce readiness training, Job coaching and Development, and Post-placement retention services. Plans to serve 120 unduplicated participants in the Pathway to Employment program	7310 Woodward Ave. Detroit, MI 48202	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	Improved Services for low/mod persons	People	120	Public service activities other than low/moderate income housing benefit	Public Services	X	ALL	ALL	5
CDBG	PS	LMC	05D	Clark Park Coalition	64,143.00	Provide year-round sports, arts and arrange of Youth summer recreation programs , a winter hockey program, and youth employment opportunities.	1130 Clark Street Detroit MI 48208	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	Improved Services for low/mod persons	People	299	Public service activities other than low/moderate income housing benefit	Public Services	N/A	2, 3	2	4, 5, 6
CDBG	PS	LMC	05D	Cody Rouge Community Action Alliance	64,143.00	Cody Rouge Youth Services Council promotes personal development of the neighborhood's youth by providing them with opportunities to engage in authentic decision-making and strong adult-youth partnerships through recreational programming.	19321 W. Chicago Detroit, MI 48228	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	Improved Services for low/mod persons	People	190	Public service activities other than low/moderate income housing benefit	Public Services	N/A	N/A	N/A	7
CDBG	PS	LMC	05D	Detroit Area Pre-College Engineering Program (DAPCEP)	70,680.00	Program provides nationally recognized enrichment programs in science technology, engineering, and mathematics (STEM) to Pre-K to 12th grade students. Program plans to enroll 1,750 students	2111 Woodward Ste 506 Detroit, MI 48201	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	Improved Services for low/mod persons	People	1750	Public service activities other than low/moderate income housing benefit	Public Services	X	ALL	ALL	ALL
CDBG	PS	LMC	05A	Detroit Association of Black Organizations (DABO)	54,143.00	Provides Senior services that promotes social engagement through events and gatherings, and support groups, provides access to health screening, wellness workshops educational seminars and more. They will also provide services to support independent living volunteer opportunities and learning.	12048 Grand River Detroit, MI 48204	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	Improved Services for low/mod persons	People	875	Public service activities other than low/moderate income housing benefit	Public Services				7

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Program Name	Activity	National Objective	Matrix Code	Sponsor Name (Activity Name)	Recommended Amount	Project Description	Site Address	Start Date	Completion Date	Objective	Outcome	Specific Objectives	Accomplishment Type	Proposed Accomplishment	Outcome Indicators	Priority Need	City wide	NRSA	Slum Blight	City Districts
CDBG	PS	LMC	05D	Detroit Horse Power	65,680.00	Detroit Horse Power's overall goal is to equip Detroit youth with the strengths of character that will allow them to graduate high school with the choice of college or career. To achieve this goal, DHP enrolls 6th through 12th graders in afterschool, year-round programming.	8425 W. McNichols Rd. Detroit, MI 48221	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A	Improved Services for low/mod persons	People	50	Public service activities other than low/moderate income housing benefit	Public Services	N/A	N/A	N/A	2
CDBG	PS	LMC	05Z	Detroit Phoenix Center (DPC)	59,143.00	SOAR -After School Enrichment Program SOAR program provides a safe and educational after-school experience for students in grades 8th-12th who are McKinney Vento Eligible. McKinney Vento is a federal law that guarantees equal access to public education for homeless children and youth.	1420 Washington Blvd. Ste 301 Detroit, MI 48226	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A	Improved Services for low/mod persons	People	265	Public service activities other than low/moderate income housing benefit	Public Services	X	ALL	ALL	5
CDBG	PS	LMC	05A	Disability Network	64,143.00	Living Green program which is a ten week program that teaches independent living skills such as goal setting, problem solving, and communication skills.	7800 W. Outer Dr. Detroit MI 48235	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A	Improved Services for low/mod persons	People	300	Public service activities other than low/moderate income housing benefit	Public Services				2
CDBG	PS	LMC	05G	First Step	54,143.00	To provide shelter and support to domestic violence survivors in the city of Detroit at the new shelter to be located in the Samaritan Center. The service includes, trauma-informed crisis intervention services, safety planning, and criminal and civil justice advocacy to survivors of domestic violence residing in the shelter. Staff will also provide critical support in navigating other community resources including connections to McKinney-Vento within DPS to insure a safe and fluid transition from shelter to long-term housing stability.	44567 Pinetree Drive Plymouth, MI 48170	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A	Improved Services for low/mod persons	People	700	Public service activities other than low/moderate income housing benefit	Public Services	X			N/A
CDBG	PS	LMC	05G	Gay Elders of Metro Detroit dba MiGEN	54,143.00	Caregiver Education, Training & Support and Kinship Support Services that will reach 50 LGBTQ+ Detroiters, caregivers (informal and formal), and their families. Training programs include access to MiGEN's caregiver training modules, which are available online and in person. These curriculum-based modules emphasize how to provide support to LGBTQ+ seniors while also examining and maintaining caregiver health and emotional resilience.	290 W. Nine Mile Ferndale, MI 48220	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A	Improved Services for low/mod persons	People	50	Public service activities other than low/moderate income housing benefit	Public Services	X			N/A
CDBG	PS	LMC	05H	(The) Greening of Detroit	64,143.00	Greening job training program works to provide new opportunities for low-income Detroiters to receive training that allows them to enter the green jobs marketplace.	13000 W. McNichols Rd, Dtroit MI 48235	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A	Improved Services for low/mod persons	People	100	Public service activities other than low/moderate income housing benefit	Public Services	X	N/A	N/A	1
CDBG	PS	LMC	05H	International Institute of Metropolitan Detroit	75,706.00	Adult Education/WorkforceDevelopment program, the Economic Advancement, Literacy and Training Program. The program will prepare low-income Detroiters with the basic literacy, workforce preparation and training needed to advance economic mobility and eliminate prolonged barriers to self-sufficiency.	111 East Kirby Detroit, MI 48202	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A	Improved Services for low/mod persons	People	1380	Public service activities other than low/moderate income housing benefit	Public Services	N/A	2,3,5	2	4,5,6,7

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CDBG	PS	LMC	05I	Jefferson East Business Association	59,143.00	Develop disaster preparedness strategies, help residents develop personal disaster preparedness plans, Provide CERT training to residents and business owners and provide private security patrols. They will also engage domestic violence survivors in partnerships with the 5th and 7th precincts.	300 River Place Drive, Suite 5250 Detroit MI, 48207	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	Improved Services for low/mod persons	People	400	Public service activities other than low/moderate income housing benefit	Public Services	N/A	1	N/A	3, 4, 6
CDBG	PS	LMC	05A	Latin Americans for Social and Economic Development (LASED)	70,680.00	Transportation, food assistance, and help in obtaining access to other vital services and provide senior wellness.	4138 W. Vernor Hwy. Detroit MI 48209	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	Improved Services for low/mod persons	People	2800	Public service activities other than low/moderate income housing benefit	Public Services	N/A	1	N/A	5
CDBG	PS	LMC	05A	Luella Hannan Memorial	70,680.00	Support to assist the Zena Baum Senior Center with program activities to fund nutrition, legal, transportation and elder abuse casework.	4750 Woodward Detroit MI 48201	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	Improved Services for low/mod persons	People	1250	Public service activities other than low/moderate income housing benefit	Public Services	X	ALL	ALL	ALL
CDBG	PS	LMC	05M	Mariner's Inn	54,143.00	provide specialized and comprehensive care for individuals who are struggling with gambling addiction or compulsive gambling. The program offers an immersive and supportive environment, where individuals can focus on their recovery without the distractions or triggers of their normal living situations. The program is tailored to the specific needs and circumstances of the participants, and is a crucial step in helping individuals overcome gambling	445 Leyard Detroit MI 48201	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	Improved Services for low/mod persons	People	80	Public service activities other than low/moderate income housing benefit	Public Services	X			6
CDBG	PS	LMC	05Z	Math Corps	54,143.00	Math Corps teachers will be working with middle and high school students in Detroit at Durfee Central. Math Corps provides math classes for middle and high school students, offering two versions of classes known as "Broccoli" and "Ice Cream." "Broccoli" covers standard grade-level-appropriate content, while "Ice Cream" explores advanced mathematical topics designed to inspire and create awe for mathematics in kids.	261 East Maple Rd Birmingham MI 48009	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	Improved Services for low/mod persons	People	250	Public service activities other than low/moderate income housing benefit	Public Services	X			N/A
CDBG	PS	LMC	05Z	Mercy Education Project	70,680.00	Mercy Education Project provides educational opportunities, life skills development, and cultural enrichment to help at-risk girls and women in southwest Detroit improve their quality of lives.	1450 Howard St Detroit MI 48216	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	Improved Services for low/mod persons	People	250	Public service activities other than low/moderate income housing benefit	Public Services	N/A	N/A	N/A	6
CDBG	PS	LMC	05D	Mosaic Youth Theatre	70,680.00	The Mosaic Arts, Leadership and Pathways program and Creative Youth Dev. Program provides year-round arts education/life-skills training, performance experience and travel opportunities for youth.	2251 Antietam Detroit MI 48207	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility		People	347	Public service activities other than low/moderate income housing benefit	Public Services	X			5
CDBG	PS	LMC	05C	Neighborhood Legal Services (Wayne County)	64,143.00	To provide comprehensive case management services, including legal representation and appropriate referrals to victims of human trafficking.	7310 Woodward Ave. , Suite 301 Detroit MI 48202	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	Improve the services for low/mod income persons	People	132	Public service activities other than low/moderate income housing benefit	Public Services	N/A	N/A	N/A	5

2024-25 HUD Annual Action Plan Budgeted Activities

Program Name	Activity	National Objective	Matrix Code	Sponsor Name (Activity Name)	Recommended Amount	Project Description	Site Address	Start Date	Completion Date	Objective	Outcome	Specific Objectives	Accomplishment Type	Proposed Accomplishment	Outcome Indicators	Priority Need	City wide	NRSA	Slum Blight	City Districts
CDBG	PS	LMC	05M	Project Healthy Community	65,680.00	Family Wellness Program is to improve the health of Detroit residents through improved health literacy, health behaviors, nutrition, and exercise. The program seeks to strengthen the relationship between participants and their primary care providers.	18100 Meyer Dr. Detroit, MI 48235	7/1/2024	6/30/2025	Suitable Living Environment	Availability/Accessibility	Improved Services for low/moderate income persons	People	225	Public service activities other than low/moderate income housing benefit	Public Services	X	N/A	N/A	2
CDBG	PS	LMC	05H	SER Metro Detroit	64,143.00	SER ReBuild Detroit Program is an Apprenticeship Readiness Training Program which program expanded contextualized programming to low-income and unemployment residents. The program enrolls resident over 18 years old with a HS diploma/GED with goal of increasing their math and reading skills to prepare for Workkeys test and apprenticeship training exam.	9301 Michigan Ave Detroit, MI 48210	7/1/2024	6/30/2025	Suitable Living Environment	Availability/Accessibility	Improve the services for low/moderate income persons	People	60	Public service activities other than low/moderate income housing benefit	Public Services	N/A	N/A	N/A	1
CDBG	PS	LMC	05Z	Siena Literacy Center	64,143.00	Basic adult literacy services and support to adults so they can successfully pursue personal goals, which include entering advanced/secondary education or workforce training, developing consumer skills to navigate life and society.	16888 Trinity Detroit MI 48219	7/1/2024	6/30/2025	Suitable Living Environment	Availability/Accessibility	Improve the services for low/moderate income persons	People	280	Public service activities other than low/moderate income housing benefit	Public Services	N/A	N/A	N/A	1
CDBG	PS	LMC	05H	Sistahs Reachin' Out	54,143.00	The Career and College Access Center (CACAC) is workforce and college readiness services that fulfill unmet needs in our community which adversely impact the agency and ability of low-income residents, particularly low-income single parent-led families, in securing educational and employment opportunities that can effectively aid in lifting them and their families out of poverty.	17567 Hubbell St #222 Detroit MI 48235	7/1/2024	6/30/2025	Suitable Living Environment	Availability/Accessibility	Improve the services for low/moderate income persons	People	2200	Public service activities other than low/moderate income housing benefit	Public Services	X			2
CDBG	PS	LMC	05D	Southwest Detroit Business Association (SDBA)	49,143.00	El Arte en la Clase after school program is to provide exposure and access to low-income students who might not otherwise have the opportunity to hear / play / learn music and performing arts.	7752 West Vernor Hwy. Suite 101 Detroit MI 48209	7/1/2024	6/30/2025	Suitable Living Environment	Availability/Accessibility	Improve the services for low/moderate income persons	People	150	Public service activities other than low/moderate income housing benefit	Public Services	X	N/A	N/A	6
CDBG	PS	LMC	05Z	Southwest Economic Solution Corporation	64,143.00	MathUp is an accelerated GED program for adult learners that addresses the significance challenges of passing the math portion of the GED exam.	1920 25th Street, Detroit, MI 43216	7/1/2024	6/30/2025	Suitable Living Environment	Availability/Accessibility	Improve the services for low/moderate income persons	People	60	Public service activities other than low/moderate income housing benefit	Public Services	X	N/A	N/A	6
CDBG	PS	LMC	05Z	Sowing Economic Empowerment (SEED)	70,680.00	The SEED Extended Learning Program (SELP) is a comprehensive afterschool and summer program designed to cater to the unique needs of grades K-5 in low to moderate-income BIPOC communities. Classroom activities use a variety of teaching models, including cooperative learning, role playing, and group discussions.	6201 River Rd. ste #200 Riverdale, MD 20737	7/1/2024	6/30/2025	Suitable Living Environment	Availability/Accessibility	Improve the services for low/moderate income persons	People	265	Public service activities other than low/moderate income housing benefit	Public Services	X			N/A

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CDBG	PSHL	LMC	03T	Cass Community Social Services Family Shelter (ES)	\$ 250,000.00	(ES) Provides emergency shelter for families	11850 Woodrow Wilson, Detroit MI 48206	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	End Chronic Homelessness	People	100	Homeless shelters	Emergency shelter and transitional housing	Yes	No	Yes	Unknown
CDBG	PSHL	LMC	03C	Cass Community Social Services (SO)	\$ 295,430.00	(SO) Outreach program for unsheltered households	11745 Rosa Parks Blvd. Detroit MI 48206	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	End Chronic Homelessness	People	300	Public service	Outreach	Yes	No	No	Unknown
CDBG	PSHL	LMC	03T	Cass Community Social Services Warming Center (ES Wm Ctr)	\$ 210,000.00	(ES) Seasonal warming center for families	1534 Webb, Detroit MI 48206	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	End Chronic Homelessness	People	65	Homeless shelters	Emergency shelter and transitional housing	Yes	No	No	Unknown
CDBG	PSHL	LMC	03T	Cass Community Social Services Rotating Shelter (ES Wm Ctr)	\$ 100,000.00	(ES) Seasonal warming center for single men	11850 Woodrow Wilson, Detroit MI 48206	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	End Chronic Homelessness	People	60	Homeless shelters	Emergency shelter and transitional housing	Yes	No	No	Unknown
CDBG	PSHL	LMC	03T	Central United Methodist Church-NOAH Project (SO)	\$ 300,000.00	(SO) Outreach program for unsheltered households	23 East Adams Detroit MI 48226	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	End Chronic Homelessness	People	175	Public service	Outreach	Yes	No	No	Unknown
CDBG	PSHL	LMC	03T	Community & Home Supports (SO)	\$ 192,688.00	(SO) Outreach program for unsheltered households	220 Bagley St, Detroit, MI 48226	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	End Chronic Homelessness	People	100	Public service	Outreach	Yes	No	No	N/A
CDBG	PSHL	LMC	03T	Coalition on Temporary Shelter (COTS) (ES)	\$ 250,000.00	(ES) Provides emergency shelter for families	16630 Wyoming Ave, Detroit, MI 48221	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	End Chronic Homelessness	People	450	Homeless shelters	Emergency shelter and transitional housing	Yes	No	Yes	N/A
CDBG	PSHL	LMC	03T	Covenant House Michigan (ES)	\$ 50,000.00	(ES) Provides emergency shelter for single youth ages 18-24	2959 MLK Blvd. Detroit MI 48208	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	End Chronic Homelessness	People	300	Homeless shelters	Emergency shelter and transitional housing	Yes	No	Yes	N/A
CDBG	PSHL	LMC	03T	Detroit Housing Services (Code Blue) (ES)	\$ 38,356.03	(ES) Provide emergency hoteling for households experiencing homelessness	2 Woodward, Detroit, MI 48226	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	End Chronic Homelessness	People	21	Homeless shelters	Emergency shelter and transitional housing	Yes	No	Yes	Unknown
CDBG	PSHL	LMC	03T	Detroit Rescue Mission Ministires-Chicago Warming Center (ES Wm Ctr)	\$ 31,967.47	(ES) Seasonal warming center for families	12900 W. Chicago, Detroit, MI 48227	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	End Chronic Homelessness	People	100	Homeless shelters	Emergency shelter and transitional housing	Yes	No	Yes	N/A
CDBG	PSHL	LMC	03T	First Step (ES)	\$ 115,500.00	(ES) Provides emergency shelter for persons fleeing domestic violence	Suppressed	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	End Chronic Homelessness	People	120	Homeless shelters	Emergency shelter and transitional housing	Yes	No	Yes	N/A
CDBG	PSHL	LMC	03T	Freedom House (ES)	\$ 115,500.00	(ES) Provides emergency shelter for refugees and asylum seekers	Suppressed	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	End Chronic Homelessness	People	130	Homeless shelters	Emergency shelter and transitional housing	Yes	No	Yes	N/A

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CDBG	PSHL	LMC	03T	Michigan Veterans Foundation (ES)	\$ 50,000.00	(ES) Provides emergency shelter for homeless male veterans.	4626 Grand River Ave, Detroit, MI 48208	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	End Chronic Homelessness	People	193	Homeless shelters	Emergency shelter and transitional housing	Yes	No	Yes	N/A
CDBG	PSHL	LMC	03T	Neighborhood Service Organization (ES)	\$ 115,500.00	(ES) Provides emergency shelter for single adults	3364 Mack Ave., Detroit, MI 48207	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	End Chronic Homelessness	People	350	Homeless shelters	Emergency shelter and transitional housing	Yes	No	Yes	N/A
CDBG	PSHL	LMC	03T	Neighborhood Service Organization (SO)	\$ 194,250.00	(SO) Outreach program for unsheltered households	882 Oakman Blvd Detroit, MI 48238	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	End Chronic Homelessness	People	68	Public service	Outreach	Yes	No	No	N/A
CDBG	PSHL	LMC	03T	The Salvation Army (ES)	\$ 115,500.00	(ES) Provides emergency shelter for families	3737 Humboldt St., Detroit, MI 48208	7/1/2024	6/30/2025	Suitable Living Environment	Availability/A ccessibility	End Chronic Homelessness	People	130	Homeless shelters	Emergency shelter and transitional housing	Yes	No	Yes	N/A
				Total PSHL	2,424,691.50															
				Total PS & PSHL	4,913,881.50															
CDBG	REPAY	N/A	19F	Book Cadillac II Note 2 (Principal)	716,000.00	Repayment of Section 108 Loan Principal	2 Woodward CAYMC, Detroit, MI 48226	7/1/2023	6/30/2024	N/A	N/A	N/A	Other	N/A	N/A	Other	N/A	N/A	N/A	N/A
CDBG	REPAY	N/A	24A	Book Cadillac II Note 2 (Interest)	14,343.00	Repayment of Section 108 Loan - Interest	2 Woodward CAYMC, Detroit, MI 48226	7/1/2023	6/30/2024	N/A	N/A	N/A	Other	N/A	N/A	Other	N/A	N/A	N/A	N/A
CDBG	REPAY	N/A	19F	Fort Shelby (Principal)	1,500,000.00	Repayment of Section 108 Loan Principal	2 Woodward CAYMC, Detroit, MI 48226+1110:V110	7/1/2023	6/30/2024	N/A	N/A	N/A	Other	N/A	N/A	Other	N/A	N/A	N/A	N/A
CDBG	REPAY	N/A	24A	Fort Shelby (Interest)	131,970.00	Repayment of Section 108 Loan - Interest	2 Woodward CAYMC, Detroit, MI 48226	7/1/2023	6/30/2024	N/A	N/A	N/A	Other	N/A	N/A	Other	N/A	N/A	N/A	N/A
CDBG	REPAY	N/A	19F	Garfield II - Note 1 - GREP (Principal)	521,000.00	Repayment of Section 108 Loan Principal	2 Woodward CAYMC, Detroit, MI 48226	7/1/2023	6/30/2024	N/A	N/A	N/A	Other	N/A	N/A	Other	N/A	N/A	N/A	N/A

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CDBG	REPAY	N/A	24A	Garfield II - Note 1 - GREP (Interest)	34,385.00	Repayment of Section 108 Loan - Interest	2 Woodward CAYMC, Detroit, MI 48226	7/1/2023	6/30/2024	N/A	N/A	N/A	Other	N/A	N/A	Other	N/A	N/A	N/A	N/A
CDBG	REPAY	N/A	19F	Garfield II - Note 2 East Forest Arts (Principal)	240,000.00	Repayment of Section 108 Loan Principal	2 Woodward CAYMC, Detroit, MI 48226	7/1/2023	6/30/2024	N/A	N/A	N/A	Other	N/A	N/A	Other	N/A	N/A	N/A	N/A
CDBG	REPAY	N/A	24A	Garfield II - Note 2 East Forest Arts (Interest)	24,776.00	Repayment of Section 108 Loan - Interest	2 Woodward CAYMC, Detroit, MI 48226	7/1/2023	6/30/2024	N/A	N/A	N/A	Other	N/A	N/A	Other	N/A	N/A	N/A	N/A
CDBG	REPAY	N/A	19F	Garfield II - Note 3 Sugar Hill (Principal)	260,000.00	Repayment of Section 108 Loan Principal	2 Woodward CAYMC, Detroit, MI 48226	7/1/2023	6/30/2024	N/A	N/A	N/A	Other	N/A	N/A	Other	N/A	N/A	N/A	N/A

CITIZENS PARTICIPATION:

Permit

Continued from Page 6A

in-plant screening of a portion of the product that is currently processed by a contractor at a different location on Zug Island, thereby reducing emissions from transportation.”

Violation notice for EES Coke

EES Coke has a troubled history of complying with environmental laws.

In 2022, the federal government initiated a Clean Air Act case against EES Coke. It alleged plant operators had significantly increased the facility’s sulfur dioxide emissions, endangering neighbors and violating air quality rules. Federal attorneys added DTE Energy and its subsidiaries last year, arguing the Detroit-based utility’s corporate leaders were responsible for EES Coke air permitting and operations.

Pollution issues continue at the plant, according to EGLE inspectors.

Two days before granting its request for new equipment, EGLE sent EES Coke a violation notice for repeated violations of its air quality permit and federal air laws. Inspectors said the plant released excess levels of visible emissions, which indicate excess particulate matter pollution.

Particulate matter is dust particles small enough to get into people’s lungs and bloodstream. It causes health issues such as asthma flare-ups, decreased lung function, premature death of people with lung or heart disease and other issues.

EES Coke executives are reviewing the violation notice and will respond to EGLE, Smith said.

“EES Coke works diligently to comply with all regulations governing the site at the state and federal level that protect public health,” he said in a statement. “We remain committed to responsibly operating under those

regulations while our plant serves a critical function, producing coke to fuel the steel industry and supporting more than 170 jobs in the community.”

EGLE spokesman Josef Greenberg said state rules and regulations don’t allow the department to consider a company’s compliance history when determining whether to issue a proposed permit.

“By law, we must base our decision on whether the project will meet all applicable state and federal air quality rules and regulations,” Greenberg said. “Additionally, the recent violation notice, and permit are not for the same process.”

Smigielski argued EGLE could take a firmer hand with polluters by interpreting state air quality rules in a way that gives them more regulatory authority.

“The big issue here is that whenever EGLE is confronting a gray area in its rules, it is framing the issue as a lack of authority, not an ability to exercise its authority,” he said.

Like other air quality activists, Smigielski said EGLE should consider the cumulative impact neighborhoods experience when there are multiple pollution sources, even if those sources are complying with their permits.

In response to public comments asking the department to exercise more authority to deny air permits, EGLE said those rules do not allow it to consider cumulative pollution impacts and give the department the ability to intervene in extreme cases that cause imminent public health dangers or to ensure equipment is operated in a way that is not harmful to the public.

“The law requires the AQD to issue a permit to a facility when its application properly demonstrates that the proposed source will comply with all applicable state and federal air quality rules and regulations,” EGLE air quality regulators wrote in response to comments.

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Shooting

Continued from Page 6A

victim was struck in the hand and the other was hit in the leg, Bettison said.

He added that police also detained a juvenile, but determined the individual was not involved in the shooting and was not a suspect.

The shooting caused a temporary panic and stampede, but no injuries were reported, police said.

Detectives are reviewing video footage recorded of the incident and near the scene, Bettison said.

He said the suspected shooter was wearing a blue hooded sweatshirt, blue shorts as well as white and blue Nike Air Force One shoes. Video showed the suspect with a gun in his hand and a muzzle flash, Bettison said.

An individual who was with the suspect is also wanted as a person of interest, according to the chief. He was dressed in a white T-shirt, white pants and white sneakers.

Both have medium complexions and are between 5-foot-8 and 5-foot-10 with slim builds, officials said.

Video showed the two people flee into a parking structure following the shooting, police said.

“We expect to have them apprehended shortly, and I encourage them to turn themselves in,” Bettison said. “We don’t have names yet, but we know who they are.”

Investigators believe the shooting stemmed from a fight between two juveniles, according to the police chief.

“One decided to make the bad decision and pull out a handgun and fire two shots,” Bettison said.

The shots struck the suspect’s intended target and a woman who was not involved in the altercation, authorities said.

The police chief added that the shooting happened outside of the area where police have metal detectors in Hart Plaza and Spirit Plaza.

“There were thousands and thousands of people here,” Betti-



Detroit Police Department

Investigators believe the shooting stemmed from a fight.

son said. “They all had a great time. It is a safe event.

“It only takes one knucklehead, one person, to make a bad decision,” he said. “We will hold individuals who choose to do that accountable.”

Prior to 2023, the last time the Detroit Police Department reported zero arrests at the downtown fireworks show was 2008, according to Detroit News archives and other media reports. In 2015, one arrest was reported.

In 2022, six people were arrested at the fireworks, including four who were cited for carrying a concealed weapon and one other who was accused of aggravated assault of a police officer.

Three people were wounded in two shootings downtown during the 2017 fireworks show, one of many infamous crimes committed at the annual event.

In 1976, after 30% of the Detroit cops who were assigned to work the fireworks detail called in sick with “the blue flu,” The Detroit News reported, “roving gangs of hoodlums ... mugged, pistol-whipped and purse-snatched their way through the throngs on the riverbank and in the downtown area, leading to 30 arrests.”

The disorder prompted a controversy after a spokesman for the

Stroh Brewing Co., which had co-sponsored the fireworks, told the media the rampant crime was prompting the Detroit beer-maker to pull its sponsorship. The next day, company officials retracted the spokesman’s statement, saying it had been made without authorization.

Two people were shot and three stabbed during the 1989 fireworks, and police made 30 arrests. In addition, minutes before the fireworks started, a 43-year-old man jumped from the fifth floor of the downtown YMCA building and died.

In a 1991 case that made national headlines, sisters Cassandra and Cossandra Rutherford were among six Black women charged with beating Joanne Was of Farmington Hills, a White woman, during that year’s fireworks. The beating was captured on videotape — a rarity in the days before ubiquitous cellphone videos — stoking racial tensions and animosity between the city and suburbs.

Cassandra Rutherford was acquitted of wrongdoing, although Cossandra Rutherford, 17, and Tangelia McLemore, 19, were convicted of robbery and assault and sentenced to up to 15 years in prison.

In 2011, a 16-year-old girl was shot in the leg while walking with friends near the Renaissance Center, while in 2004, at least two gunmen opened fire in Hart Plaza, wounding eight people and killing 47-year-old Donald Murphy, who died weeks after the shooting.

In the 2004 case, officers arrested Daron Caldwell, who was jailed for three months before Wayne County prosecutors dismissed the charges because his DNA didn’t match items found at the crime scene and because ballistics tests determined more than one gun was used in the carnage.

Caldwell sued the city for \$100 million in federal court, claiming his rights had been violated, although the lawsuit was dismissed in 2007. The shooters were never arrested, and the case remains open.

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CITY OF DETROIT

HOUSING AND REVITALIZATION DEPARTMENT

MICHAEL E. DUGGAN, MAYOR

SUMMARY AND NOTICE OF THE DRAFT 2025-29 CONSOLIDATED PLAN/ANNUAL ACTION PLAN

Coleman A. Young Municipal Center (CAYMC)
Housing and Revitalization Department
2 Woodward Avenue, Suite 908
Detroit, MI 48226

- Homeless & Other Special Needs
- HOPWA Goals
- Barriers to Affordable Housing

- Other Actions
- Program Specific Requirement

FEDERAL RESOURCES

City of Detroit Action Plan revenues for the City’s Fiscal Years 2024-25 and 2025-26 are shown below:

Program	2024-25 Revenue	2025-26 Revenue
CDBG Entitlement	\$32,759,210	\$32,283,682
CDBG Program Income	\$0	\$0
CDBG Subtotal	\$32,759,210	\$32,283,682
HOME	\$5,928,131	\$5,984,902.09
HOME Program Income	\$4,785,000	\$4,200,000
ESG	\$2,990,945	\$2,879,131
HOPWA	\$3,593,290	\$3,542,718
Grand Total	\$50,056,576	\$48,890,433.09

2025-26 DRAFT ACTION PLAN FUNDING RECOMMENDATIONS

Listed below are the Mayor’s 2025-26 funding recommendations by program categories for CDBG, ESG, HOME, and HOPWA grants.

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)			HOME INVESTMENT PARTNERSHIP		
Activity Category		2025-26 Draft Allocations	Activity Category	2025-26 Draft Allocations	
ADMIN AND PLANNING (ADPLN)	ADPLN	\$6,456,736	ADMIN AND PLANNING (ADPLN)	ADPLN	\$598,490
DEMOLITION (DEMO)	DEMO	\$0	HOME Projects		\$5,386,412.09
ECONOMIC DEVELOPMENT (ED)	ED	\$0	<i>Estimated Program Income</i>	PI	\$4,200,000
HOMELESS PUBLIC SERVICE (HPS)	HPS	\$2,395,517			
HOME REPAIR (HR) incl HOUSING COUNSELING SERVICES	HR	\$10,315,223			
HOMEOWNERSHIP	HO	160,000			
PUBLIC FACILITY REHAB (PFR)	PFR	\$1,000,000			
PUBLIC SERVICE (PS) incl SUMMER JOBS	PS	\$3,947,035			
MULTI-FAMILY PRE-DEVELOPMENT AFFORDABLE HOUSING	DVLPT	\$7,509,171			
GSD PARK IMPROVEMENTS	PRKS	\$500,000			
SECTION 108 LOANS (REPAY)	REPAY	\$0			
TOTAL CDBG		\$32,283,682	TOTAL HOME		\$10,184,902.09

EMERGENCY SOLUTIONS GRANTS (ESG)		HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS (HOPWA)			
Activity Category	2025-26 Draft Allocations	Activity Category	2025-26 Draft Allocations		
ADMIN AND PLANNING (ADPLN)	ADPLN	\$215,935	ADMIN AND PLANNING (ADPLN)	ADPLN	\$106,282
ESG Projects	\$2,663,196	HOPWA Projects	\$ 3,436,436		
TOTAL ESG	\$2,879,131	TOTAL HOPWA	\$3,542,718		

Important Note: These Recommendations Are Subject To The Approval Of The Detroit City Council And The U.S. Department Of Housing And Urban Development (HUD). City Council May Change The Amounts, Add Projects And Activities, Or Delete Projects And Activities. In Addition, HUD May Set Conditions on the Use of These Funds.

NOTICE OF NON-DISCRIMINATION: The City of Detroit does not discriminate on the basis of race, color, creed, national origin, age, handicap, sex or sexual orientation. Discrimination complaints may be filed with the City of Detroit, Civil Rights, Inclusion & Opportunity Department 2 Woodward Suite 1240 Coleman A. Young Municipal Center, Detroit, Michigan 48226

INFORMATION AND PUBLIC REVIEW

This notice provides a summary of the 2025-2029 Draft Consolidated Plan, the 2025-26 Annual Action Plan and the Draft Neighborhood Revitalization Strategy Area (NRSA). The Draft NRSA, Consolidated/Annual Action Plan and funding recommendations will be available for public review beginning June 25, 2025 to July 25, 2025 online at: <http://www.detroitmi.gov/hrd> Click on HUD Consolidated Plan, Action Plans & CAPERS. During this time, citizens may obtain information, view and submit comments regarding the 2025-29 Draft Consolidated Plan, 2025-26 Action Plan and NRSA. Citizens may also submit comments by letter (at the address shown below) or by e-mail at ConPlanComments@detroitmi.gov on or by July 25, 2025. For further information, please contact:

W. T. Duncan
Housing and Revitalization Department
2 Woodward Avenue, Suite 908
Detroit, MI 48226
Telephone: (313) 224-0315

BACKGROUND

The 2025-2029 HUD Consolidated Plan is a five-year Strategic Plan with annual Action Plan updates. The Strategic Plan describes the needs, conditions, goals, objectives, priorities, strategies, resources and programs related to community development, affordable housing, the homeless, and persons with special needs, including persons living with HIV/AIDS. The City’s Fiscal Year (FY) 2025-26 program year marks the 1st year of the Annual Action Plan for the 2025-2029 Consolidated Plan.

The Draft FY 2025-26 Annual Action Plan is the City of Detroit’s annual funding application for the following HUD funded programs:

- Community Development Block Grant (CDBG)
- HOME Investment Partnership (HOME)
- Emergency Solutions Grant (ESG)
- Housing Opportunities For Persons With AIDS (HOPWA)

SUMMARY OF THE 2025-2029 HUD CONSOLIDATED PLAN AND 2025-26 DRAFT ACTION PLAN CONTENTS

The HUD Consolidated Plan contains the following major sections with discussions in the following:

- Executive Summary
- The Process
- Needs Assessment
- Market Analysis
- Strategic Plan
- Annual Action Plan
- Certifications

EXECUTIVE SUMMARY

The Executive Summary includes a summary of objectives, outcomes, and major sections identified in the plan.

THE PROCESS

The Process section summarizes responsible agencies, consultation process and citizen participation.

NEEDS ASSESSMENT

The Needs Assessment section discusses housing needs (i.e. low and moderate income housing problems and public housing needs). This section will also include homeless, non-homeless special needs assessments, and non-housing community development needs.

MARKET ANALYSIS

The Market Analysis section includes the following discussions:

- Number of Housing Units
- Cost of Housing
- Condition of Housing
- Public and Assisted Housing
- Homeless Facilities
- Special Needs Facilities and Services
- Barriers to Affordable Housing
- Non-Housing Community Development Assets
- Needs and Market Analysis Discussion

STRATEGIC PLAN

The Strategic Plan includes the following discussions:

- Geographic Priorities
- Priority Needs
- Influence of Market Conditions
- Anticipated Resources
- Institutional Delivery Structure
- Goals
- Public Housing Accessibility and Involvement
- Barriers to Affordable Housing
- Homelessness Strategy
- Lead Based Paint Hazards
- Anti-Poverty Strategy
- Monitoring

ANNUAL ACTION PLAN

The Annual Action Plan includes the following discussions:

- Expected Resources
- Annual Goals and Objectives
- Projects
- Geographic Distribution
- Affordable Housing
- Public Housing

DF-2024862

Public Comments – Detroit FY 2025-2029 Consolidated Plan Meetings

April 22, 2025 – Virtual Public Meeting #1

- Strong demand for home repair grants, including for legacy homeowners, without strict income restrictions.
- Concerns about funding going to new housing instead of rehabbing existing deteriorated homes.
- Requests for better collaboration with the Land Bank to repurpose vacant properties for affordable housing.
- Barriers identified in 0% interest loan program (ownership time requirement, insurance issues).
- Desire for more accessible information on available housing programs.
- Interest in edible landscaping to address food insecurity.
- Need for improved relationships between the Department of Neighborhoods (DON) and community organizations.
- Calls for more park, recreation, and youth facility investments.
- Concerns over lack of environmental justice considerations and blight removal efforts.
- Desire for more support to small local contractors over large outside firms.

April 24, 2025 – Virtual Public Meeting #2

- Priorities ranked: affordable rental homes, affordable apartments, home repair, homeownership, senior housing.
- Support for social housing models (community land trusts, low-equity co-ops).
- Interest in parks, infrastructure, and community centers as neighborhood priorities.
- Requests for improved transportation, mental health, and health services.
- Concerns about growing homelessness; calls for prevention, shelter, and permanent housing investments.
- Support for job creation, small business support, and commercial rehab.
- Questions about disaster recovery and infrastructure funding allocation.
- Need for expanded repair programs to include younger low-income homeowners.
- Frustration over outdated resource guides; preference for online updates.

June 3, 2025 – In-Person Public Meeting – Butzel Family Center

- Frustration that funding focuses on lowest-income residents, excluding moderate-income households needing help.
- Need for more accessible program information and trusted local contact points.
- Requests for legal assistance and support navigating home repair paperwork.
- Senior home repair program valued but underfunded; suggestion for phased applications with waitlists.
- Old homes require repairs far exceeding grant amounts.
- Affordable housing: desire for more small-scale senior housing and better outreach.

- Community programs: calls for more advertising, transportation access, and consistent programming.
- Neighborhood improvements: appreciation for Motor City Match; need for simpler processes for other programs.
- Innovative suggestions: equity investment model for business grants, microgrants/loans for small orgs.
- General concerns: lack of public awareness, unclear program impacts, and hidden costs not disclosed.

June 18, 2025 – Virtual Public Hearing

- Senior home repair program valued for aging in place and ADA upgrades but hampered by long waits and paperwork.
- 0% interest home loans underutilized due to low awareness and long application times; suggestion to bundle with down payment assistance.
- Affordable housing pre-development assistance seen as biased toward large developers; calls for prioritizing rehab projects and nonprofit access.
- HOME rehab program underfunded; need to include households over 80% AMI.
- Emergency shelter appreciated but hindered by poor coordination, lack of beds, and unresponsive case workers.
- Homelessness prevention programs valued but threatened by budget cuts; need better inter-agency communication and centralized housing database.
- Public facility rehab: interest in incorporating green energy and tech into parks.
- Small business assistance recognized as valuable but needing better local access.

June 5, 2025 – In-Person Public Meeting – Northwest Activities Center

Public Comments Summary

1. Homeowner Support

The 0% interest home repair loan program is appreciated in concept but criticized for its lengthy, time-consuming application process and burdensome eligibility requirements (current property taxes, three years of personal tax filings, proof of insurance).

Income guidelines are viewed as too restrictive, excluding many moderate-income households.

Requests for:

- Increased grant funding rather than loans.
- Broader accessibility to include higher-income individuals who still need assistance.
- Closing the gap between low- and moderate-income eligibility.
- Redefining income guidelines.

2. Affordable Housing & Development Support

Many attendees had never heard of the Predevelopment Assistance program and noted that only 300 units have been created since 2016, which they felt was unimpressive.

Small and emerging developers face significant barriers covering predevelopment costs, which are essential before securing financing.

Recommendations included:

- Covering costs for architects and engineers.
- Expanding project types to include vacant land, unoccupied structures, senior housing, and mixed-income projects.
- Targeting support for nonprofit and emerging developers.
- Offering both online and in-person application intake.
- Hosting orientation sessions to explain eligibility.

Concerns that programs are designed for large developers rather than “the little guy.”

3. Neighborhood Improvements & Small Business Assistance

Some businesses have benefited from Motor City Match, but access is currently online-only, which limits participation.

Requests for:

- In-person engagement with block clubs and business associations.
- Grants for branding (e.g., banners), facade improvements, and storefront upgrades.
- Streamlined permits, licenses, and department coordination under a single office.

Public Facility Rehabilitation program is not well known; attendees cited too many restrictions and difficulty accessing information.

Suggested improvements:

- Outreach through community groups.
- Partnerships with skilled trades, interns, and students.
- A single point of contact for questions.
- More informational meetings and workshops.
- Increased grant funding for facilities.

4. Community Spaces & Beautification

Requests for City assistance in neighborhood beautification and higher/modifiable income limits for program qualification.

Calls for funding to establish community centers and spaces that serve adults beyond senior or low-income populations, combining recreation and wellness.

Interest in starting small businesses and community development corporations (CDCs).

Frustration over years of unsuccessful attempts to contact the City or access programs.

5. General Concerns & Questions

Desire for clearer communication about:

- Which programs are part of the Consolidated Plan.

- Which are available to individual residents.
- Funding sources and allocation processes.
- Contingency plans if federal funding is cut.

Concern that small, first-time, and emerging developers lack access to funding despite being capable of doing the construction work themselves.

Perception that programs fill up immediately after opening, making them hard for residents to access.

SAVE THE DATE

Join HRD for the City of Detroit's **Consolidated Plan** meetings to discuss Federal funding for housing and community development!

Come in person for **refreshments** and **raffle!**
The community organization that shows up with the most people wins a **prize!**

Tuesday, June 3, 5:00 - 6:30pm
Butzel Family Center (East Side)
7737 Kercheval

Thursday, June 5, 5:00 - 6:30pm
Northwest Activities Center (West Side)
18100 Meyers

Wednesday, June 18, 5:30 - 6:30pm
ONLINE (Zoom)

<https://tinyurl.com/ConPlanZoom> *(or scan)* →



Please register in advance!

<https://tinyurl.com/ConPlanRSVP> *(or scan)* →



For more information, visit:
<https://tinyurl.com/detroithrd>



Homeless Solutions Policy & Procedure Manual



HOMELESSNESS SOLUTIONS POLICIES & PROCEDURES MANUAL



City of Detroit

Housing and Revitalization Department

Published September 2018

Updated January 2025

City of Detroit Contact Information

Staff working at the City of Detroit’s Housing and Revitalization Department maintain traditional business hours and can be contacted at:

Phone: 313.224.6380

Website: <http://www.detroitmi.gov/HRD>

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Section 1:

General Information and Background



Purpose of this Document

This document is intended to serve as a guide for subrecipients of the City of Detroit's Homelessness Solutions funding. Homelessness Solutions funding can include Emergency Solutions Grant (ESG), Community Development Block Grant (CDBG), American Rescue Plan Act (ARPA), HOME-ARP, General Funds, or any other funding source provided through the City of Detroit's Homelessness Solutions Division. The document provides an overview of the ESG Program, outlines the requirements for effectively using grant funds, and describes the policies and procedures for conducting activities under the ESG Program. Please note programs receiving CDBG or other funding source matching funds through the Homelessness Solutions are bound by the information contained in this manual.

It is important to note that this document summarizes various grant requirements and is not intended to replace the regulations in 24 CFR Part 576 or any applicable federal, state, or local laws. In addition to this document, subrecipients should also reference the program regulations and the grant agreement to ensure compliance with the requirements of the ESG Program.

There are supplemental policy and procedure manuals that should be used referenced as needed:

- [Rapid Rehousing Policies and Procedures](#)
- [Housing Choice Voucher Policies and Procedures](#)
- [Policies and Procedures Manual for Emergency Solutions Grants Coronavirus \(ESG-CV\) Homeless Programs](#)

How to Use This Document

Subrecipients and contractors can use this document as an ongoing reference guide throughout the implementation of their ESG-funded program. The document is organized into sections that can be easily referenced using the table of contents.

The applicable rules for any specific project depend on both the source of funds (Detroit Continuum of Care funds or Emergency Solutions Grants funds through the City of Detroit Office of Housing and Revitalization) and the particular program component for which the funds are designated. As such, not every section of this manual is applicable to every program.

This manual has been organized into subsections that are most relevant to each program component type in order to provide easy access to applicable sections for any given provider. Readers who are unsure under which component their project is funded should refer to their grant agreement and the descriptions of ESG program components. If additional questions arise, please contact the City of Detroit for additional information about program requirements and effective implementation strategies of the ESG Program.

Values

To ensure continuity and consistency within City of Detroit ESG-funded homeless service programs, subrecipients should follow the guiding principles outlined below when implementing their programs:

1. Housing is a basic human need; providers must ensure that housing options offered to clients are accessible, safe, and affordable;
2. Programs should first ensure that a client's basic needs are met (food, housing, clothing, etc.) prior to focusing on other needs (recovery, employment, education, etc.) based on the client's situation and their requests for specific types of assistance;
3. Clients have the right to set their own goals and make their own decisions, even if their goals are different than those of the service provider. Service providers should work to reduce as many barriers to services as possible;
4. Clients are the experts in what they need and how they can achieve their goals. A client's strengths and assets should always be leveraged and considered in service delivery;
5. Every person has inherent dignity and worth; service providers should treat all clients with respect, being mindful of individual differences and cultural and ethnic diversity;
6. Clients have a right to privacy, confidentiality, and to be informed of their rights (especially related to their records, program termination, grievances, etc.);
7. Services delivered to clients should promote client well-being and work to integrate the client with mainstream resources and the larger community as much as possible.

ESG Overview

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) revised the Emergency Shelter Grants Program and renamed it the Emergency Solutions Grants (ESG) Program. The ESG Interim Rule went into effect on January 4, 2012.

The ESG Program provides funding in order to: (1) engage homeless individuals and families living on the street; (2) improve the number and quality of emergency shelters for individuals and families experiencing homelessness; (3) help operate these shelters; (4) provide essential services to shelter residents; (5) rapidly rehouse homeless individuals and families; and (6) prevent families/individuals from becoming homeless. ESG funds can be used for five program components: street outreach, emergency shelter, homelessness prevention, Rapid Rehousing assistance, and HMIS. Though not a program component, funds may also be used for necessary administrative activities.

For more information about the ESG Program, including program guides and tools, visit the [ESG Program page](#) on the HUD Exchange website.

Homelessness Response System Coordination

In accordance with [24 CFR 576.400\(b\)](#) the City and its ESG subrecipients are required to participate in the Detroit Continuum of Care (CoC) and the local Coordinated Entry System (see Section 3 for additional information on Coordinated Entry). System coordination is a vital part in a community's plan to prevent and end homelessness. The Homeless Action Network of Detroit (HAND) is the lead agency for the Detroit CoC. ESG subrecipients must participate and be a voting member in General Membership meetings. For additional information on the Detroit CoC, please visit <https://www.handetroit.org/continuum-of-care>.

Coordination with local programs that are targeted to those experiencing homelessness and mainstream resources includes (but not limited to): the John D. Dingell Department of Veterans Affairs Medical Center, Detroit Public Schools (and other local school systems), Federally Qualified Health Centers (FQHC), the State of Michigan- including Michigan State Housing Development Authority (MSHDA) and Michigan Department of Health & Human Services (MDHHS), Head Start, mental health providers, substance use providers, and workforce development.

Frequently Used Terms

This manual uses many terms and abbreviations throughout it. Please reference Appendix I for definition of terms used.

Section 2: Funding Process and Requirements



Overview

The Emergency Solutions Grants (ESG) Program was established through the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act). ESG regulations were established in an interim rule published in the Federal Register on December 5, 2011. The U.S. Department of Housing and Urban Development (HUD) administers the ESG Program and allocates funding to recipients each year. In Detroit, the City of Detroit's Office of Housing and Revitalization administers ESG funds.

Grant Awards and Spending Requirements

The City of Detroit receives an ESG allocation from HUD each year. As an ESG recipient, Detroit is required to consult with the local Continuum of Care to determine how to allocate ESG funds to subrecipients. The grant amount, except for administrative costs, must be obligated by the City of Detroit within 180 days after the date that HUD signs the grant agreement. Funds are considered obligated through either an agreement or award letter with a subrecipient that stipulates the required payment; a procurement contract; or a written designation of a department within the City of Detroit government to carry out an eligible activity.

In Detroit, organizations receive notification of their grant award through the receipt of an "award letter". The award letter will list a date by which organizations are expected to submit a scope and budget for the project. Please note that organizations are expected to respond to request for contract documentation by the date outlined on their award letter in order to expedite the contracting process.

Detroit must draw down and expend funds from the year's grant at least once per quarter of the program year. The full grant amount must be expended within 24 months after the date that HUD signs the grant agreement. The City of Detroit is required to pay subrecipients for eligible activities within 30 days after receiving a payment request.

Subrecipients are expected to spend the funds provided within the initial grant term. Requests for extension must occur 90 days prior to contract expiration in order to be considered. Repeated extension requests may result in a reduction in future grant awards. Organizations who are not on track to expend their awarded contract three months into the contract will be expected to submit a spend plan. If the organization is still not on track at six months, the City of Detroit reserves the right to reallocate the funds to a proven spender.

All grant expenses must be in compliance with [2 CFR 200, Subpart E](#) and [24 CFR 576](#). Expenses must be allowable, allocable, and reasonable.

Additional information about obligation, expenditure, and payment requirements can be found in [24 CFR 576.203](#).

Invoicing Process

Subrecipients must request payment from the City of Detroit using the invoicing process outlined in this manual, once their ESG contract is in place. Subrecipients requesting reimbursement must adhere to the following:

- Submit program reimbursement requests and supporting documentation by the 15th of each month for the previous month.
- Submit electronic copy of the reimbursement packages to the SmartSheet link provided at the beginning of the grant year

Important: Failure to submit timely requests for reimbursement can result in reallocations, reductions in awards, or loss of future program funding.

After review and submission of payment documentation, subrecipients will be notified of any deficiencies and/or disallowed costs. Following City of Detroit approval, requested invoices should be uploaded to the Supplier portal for reimbursement. The City of Detroit is committed to timely reimbursement of subrecipients and has created internal timeliness expectations to meet this requirement, however, the 30-day payment clock begins when a complete reimbursement package is submitted by the subrecipient.

Supplier Portal Contact Information:

- Supplier Portal Information and tools: www.detroitmi.gov/supplier
- Supplier Portal Hotline and Assistance with creating invoices: 313-224-1500
- Supplier portal questions: procurementinthecloud@detroitmi.gov

Effective March 2020, hard copies of payment packets should not be dropped off to the City of Detroit's Housing and Revitalization Department.

For questions related to the payment process, please contact your City of Detroit program manager directly.

City of Detroit Subrecipients

Eligible Subrecipients

Private, nonprofit, tax-exempt organizations that plan to provide Street Outreach, Emergency Shelter (including Warming Centers), Rapid Rehousing, and Homelessness Prevention services are eligible to apply for ESG funds. Organizations must be in good standing with HUD and the City of Detroit to be considered for funding.

Subrecipient Requirements

All City of Detroit ESG subrecipients must:

- Record all client-related data and activity using the Continuum of Care (CoC) established HMIS,
- Participate in the Continuum of Care as defined as participating in CoC General Membership meetings and/or CoC Committees or Work Groups,
- Participate actively in the community-wide Coordinated Assessment Model (CAM),
- Provide services consistent with a Housing First and Low Barrier approach. (See Appendix I: Frequently Used Terms for more information),
- Provide a client grievance process that upholds and protects client’s rights,
- Comply with all requirements in their subrecipient agreements, federal requirements outlined in the ESG Interim Rule, and locally established written program standards.

Subrecipient Leadership & Management

The City of Detroit funded subrecipients’ Board of Directors shall consist of voluntary (unpaid) members, with the possible exception of the agency’s CEO or Director. Subrecipients must include on the board of directors one or more members who are either homeless or formerly homeless to ensure alignment of services with needs.

Subrecipients’ Board of Directors shall meet at least quarterly and set overall policy for the agency. Minutes of the meetings shall be maintained for a period of no less than five years. Subrecipients must have a secure storage space for confidential documents relating to clients and personnel. Subrecipients shall have a policy manual which includes the project’s purpose, population served, regulations, rules, and procedures.

HUD Requirements

All projects must comply with the [Fair Housing Act](#), [Equal Access to Housing Final Rule](#) (including [Family Separation](#)), and the [Americans with Disabilities Act](#) regulations and must be reflected in their agency policies and procedures. **All providers are required to establish organizational policies to ensure that all federal laws are followed in the administration of ESG services.**

Additional HUD Requirements

All funded projects are expected to be familiar with and adhere to all HUD requirements including the [CoC Program Interim Rule](#), applicable Notices, and CoC Program Notice of Funding Available (NOFA) (s) under which the project is funded. This includes, but is not limited to:

- Participant eligibility
- Prioritization
- Allowable activities and costs
- Site control
- Subsidy layering
- Environmental review
- Matching requirements

- Calculating occupancy charges and rent
- Limitations on transitional housing
- Term of commitment, repayment of grants, and prevention of undue benefits
- Displacement, relocation, and acquisition
- Timeliness standards
- Limitation on use of funds
- Limitation on use of grant funds to serve persons defined as homeless under other federal laws
- Termination of assistance to program participants
- Fair Housing and Equal Opportunity
- Conflicts of interest
- Program income
- Recordkeeping requirements
- Grant and project changes
- Other applicable federal requirements as outlined in the regulations

Match Requirements

Federal Requirements

As an ESG recipient, the City of Detroit is required to match its ESG fiscal year award amount with an equal amount of cash and/or in-kind contributions such as donated buildings, donated materials, or volunteer services. Sources of match funds include any federal source other than the ESG program as well as state, local, and private sources. If matching funds are from a federal source, Detroit must ensure the following:

- The laws governing the funds that will be used to match do not prohibit those funds from being used as ESG match funds.
- If ESG funds are used as a source of matching funds for another federal program, that federal program's funds cannot be used as a source of ESG match funds.

If funds (regardless of the source) were used to match a previous ESG grant, those funds cannot be used to meet the matching requirements of a subsequent ESG award.

Eligible Types of Matching Contributions

The matching requirement may be met by one or both of the following:

1. Cash contributions: Cash expended to pay for allowable costs incurred by the recipient or a subrecipient.
2. Noncash contributions: The value of any real property, equipment, goods, or services contributed to the recipient's or subrecipient's ESG program, provided that if the recipient or subrecipient had to pay for them with grant funds, the costs would have been allowable. Noncash contributions may also include the purchase value of any donated building. Non-cash

contributions must be valued in accordance with the requirements of [2 CFR 200.306\(d-i\)](#) and [24 CFR 576.201\(c\)](#).

3. Program income: Costs that are paid by program income, provided that they are eligible ESG costs and supplement the recipient's ESG program, can be counted towards the matching requirement.

When calculating the amount of noncash contributions, the following must be taken into consideration:

- To determine the value of any donated material, building, or lease, the recipient must use a method reasonably calculated to establish the fair market value.
- Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the recipient's or subrecipient's organization. If the recipient or subrecipient does not have employees performing similar work, the rates must be consistent with those ordinarily paid by other employers for similar work in the same labor market.
- Some noncash contributions are real property, equipment, goods, or services that, if the recipient or subrecipient had to pay for them with grant funds, the payments would have been indirect costs. Matching credit for these contributions must be given only if the recipient or subrecipient has established, along with its regular indirect cost rate, a special rate for allocating to individual projects or programs the value of those contributions.

All match contributions must be allowable under [2 CFR Part 200, Subpart E](#). Match requirements can be found at [24 CFR § 576.201](#)

Subrecipient Match Requirements

The City of Detroit uses Community Development Block Grant (CDBG) funds to help subrecipients meet match requirements. CDBG awards in the corresponding program year can be used as match. Any ESG match requirement that exceeds the CDBG award must be supplied by the subrecipient. Subrecipients will be required to submit a Match Documentation Form (Appendix A) with their last ESG payment for the program year. This match must be expended on ESG-eligible activities. Matching sources may include cash contributions expended for allowable expenses and non-cash contributions including, but not limited to: the value of any real property, equipment, goods, or services committed to support ESG-eligible activities during the period of the ESG subrecipient agreement. (See the above Federal Requirements section for more information).

Match requirements can be found at [24 CFR § 576.201](#)

Documenting Match Requirements

The City of Detroit and all subrecipients must keep records of the source of funds used to satisfy the ESG matching requirement. The records must indicate the fiscal year grant for which the matching contribution is being used. The records must also show how the value of noncash contributions was calculated. Note that, to the extent possible, the calculation for volunteer services must use the same methods that the organization uses to determine regular personnel costs.

For more information about recordkeeping requirements, see [24 CFR 576.500](#).

Section 3: Coordinated Entry System



Overview

Coordinated Entry is a centralized and streamlined system for accessing housing and support services to end homelessness in a community. Coordinated Entry is required by the U.S. Department of Housing and Urban Development (HUD) for all Continuums of Care (CoCs) as stated in [24 CFR 578.7 \(a\)\(8\)](#) of the CoC Program Interim Rule.

Detroit's Coordinated Entry System, the Coordinated Assessment Model (CAM), aims to work with households to understand their strengths and needs, complete a common assessment, and connect households with housing and homeless assistance (based on information gathered and on availability). All ESG, CDBG, and CoC funded programs are required to use the CoC's coordinated entry system.

About the CAM

The CAM operates Access Points throughout the City of Detroit in addition to a phone line that serves as points of entry for clients into the Emergency Shelter network. Information regarding CAM hours and locations can be found on the CAM website: www.camdetroit.org. CAM sites, or Access Points, utilize a shelter prioritization process, to ensure efficient referral to shelters in all areas of the city. All clients who are referred to shelter will be provided with the "Client's Rights" handout (Appendix VI) to ensure clients understand minimum shelter expectations and how to file a grievance if they believe they've been mistreated.

CAM Access

During CAM Operating Hours:

- Household connects with CAM in person at a CAM Access Point OR through the CAM access line (if operational).
- Access Points hours and locations can be found at: www.camdetroit.org

After CAM Operating Hours/Weekends/Holidays

- If a household presents directly to an Emergency Shelter or Warming Center at these times, the provider should exhaust all efforts to allow the household inside for the night and then connecting to CAM over the phone or referring to a CAM Access Point the following morning.
- If an Emergency Shelter or Warming Center is at capacity, they should also attempt to divert the household to other shelters or agencies for possible placement if they have space available.

Street Outreach

- Street Outreach team conducts CAM intake, documentation, and shelter/warming center placement.
- Street Outreach team assists with transportation to CAM and/or emergency shelter

- Street outreach teams’ goal is to connect unsheltered residents to the homelessness response system. Methods of connection vary depending upon time of day.
 - During standard business hours street outreach teams connect residents to CAM to be assessed and referred to shelter, if shelter is available.
 - Outside of standard business hours street outreach teams attempt to facilitate shelter placement. If shelter placement is unavailable teams provide information about CAM and the process for following up on the next business day.
- Street outreach teams use HMIS and internal record keeping mechanisms to maintain connections with and track any residents that refuses to contact CAM and or refuses shelter. Street outreach attempts to complete the standardized assessment tool with the resident.

CAM Liaisons

CAM Liaisons are responsible for serving as “point persons” between their respective agency and the CAM; some agencies appoint multiple CAM Liaisons, one for each program “type” the agency operates. Duties of CAM Liaisons include, but are not limited to:

- Actively participate in applicable Provider Workgroup meetings.
- Serve as the primary point of contact for CAM and relay information learned through sub-committee meetings and other CAM Liaison communications to other staff at their agency.
- Communicate CAM-related concerns, issues, recommendations, and/or feedback from their agency to the appropriate provider workgroup
- If interested, nominate themselves (or other CAM Liaisons) to serve on the CAM Governance Committee.

Shelter CAM Policies

All shelters must adhere to the below policies related to CAM services:

1. **Referrals:** 100% of shelter clients **must be referred through CAM**. If CAM did not serve as the initial intake point (example: the client walked in to shelter after CAM hours), it is the shelter’s responsibility to connect the client to CAM the next business day. This ensures clients in shelter get immediate access to housing services they may qualify for.
2. **Services:** Shelter providers and the CAM share the goal of linking families and individuals with housing as quickly and effectively as possible. Therefore, shelter case management staff should **coordinate with the CAM navigators to connect persons experiencing a housing crisis with the resources and community services they need**. This coordination will help the client to secure safe housing as quickly as possible and will increase the likelihood of successful housing retention. -
3. **VI-SPDAT:** All clients are expected to have a **VI-SPDAT score in HMIS**, completed by CAM staff within the last 6 months. For clients without an updated assessment, shelters are responsible for coordinating a connection to CAM to ensure a linkage to services.

4. **Daily bed counts:** Shelters must provide an accurate **daily bed count** to the CAM to enable efficient placement of clients presenting at the Access Points that cannot be diverted from the shelter system. Daily bed count data must be provided to the CAM by 9 A.M. daily through this electronic form- [CAM Bed Reporting](#).
5. **Bed holds:** Shelter beds for which CAM has made a referral shall be held until 9pm. After 9pm, referrals are no longer honored, and beds are distributed on a first-come, first-serve basis.
6. **Bans:** Clients who are temporarily banned from the facility must be entered into HMIS by the shelter within 24 hours of the ban being issued to the client. Failure to update client status including suspensions and bans may result in the CAM system referring “banned” individuals back to the agency that banned them. Shelter bans are not to exceed six months in duration. If an agency has more than one shelter program, and a client is issued a ban, the ban cannot be applied to other shelter programs the agency is operating.

Requesting a VI-SPDAT or Full SPDAT Re-assessment

Shelter and Street Outreach staff are able to request a new VI-SPDAT or Full SPDAT assessment for a client if they believe that the VI-SPDAT or Full SPDAT score does not reflect the client’s current situation.

Re-Assessment Process:

- Staff requesting a new VI or Full SPDAT should complete the “Request for Reassessment Form” on <https://camdetroit.org/for-providers/>
 - Include detailed information on what has changed or was not discussed at the time of the original VI or Full SPDAT
 - Fill out each section of the form or it will be rejected. If you do not have the information, please put N/A or Unknown.
- CAM staff will review the submitted request and any supporting documents provided to a make a determination within 3 business days of submission.
- Once the determination is made, CAM will notify the requesting staff of the outcome via email and attach the request form with comments.
- If the reassessment is approved, CAM will assign an Intake Specialist to reassess the client.
- CAM staff will notify the submitting staff of the outcome.

CAM Coordination Related to MSHDA Housing Choice Vouchers (HCV)

MSHDA HCVs are dependent upon the State of Michigan’s internal budget and availability of federal resources. These resources ebb and flow in our system and as such may not be available at any given time. If MSHDA HCVs are available, it is expected that these resources follow the current CAM prioritization. All providers are responsible for assisting their clients with signing up and obtaining vouchers, as applicable.

Client Grievance Process

Overview

All households served by agencies within the Detroit Continuum of Care (CoC) have the right to file a grievance if they feel their rights have been violated by any program or agency within the Detroit CoC. Agencies are required to establish an internal client grievance process and to ensure it is available and accessible to clients. This internal policy should include a formal review process that seeks resolution with the client and prevents retaliation from the agency. This process should also be made available in a confidential for the client. If a client is not satisfied with the agency's response or fears retaliation, the CoC has an established process.

The CoC Lead Agency, Homeless Action Network of Detroit (HAND), receives all grievances that are filed outside of an agencies internal process. HAND will investigate grievances that are filed outside of City funding (CoC funded programs). Grievances against City funded programs are investigated by the City of Detroit and may be elevated to the Michigan Department of Health and Human Services (MDHHS) Emergency Shelter Program (ESP) funder if necessary. If resolution cannot be found internally for grievances filed against CoC funded and/or City funded agencies, they will then be reviewed by the CoC Board Grievance Review Committee (GRC) to vote on whether they believe the grievance should be decided as "Substantiated" or "Not Substantiated". City of Detroit staff are not voting members in this committee, only elected board members. For more information regarding the CoC Grievance process and to find the form to file a grievance please visit HAND's website, found [here](#).

Grievance Investigation Procedure

Once City of Detroit staff have received a grievance, they will initially see if any resolution can be found at the agency level. If resolution is not attainable, City staff will begin contacting the appropriate parties to collect all relevant information to be presented to the GRC. City staff will contact the client within 3 business days or less of receiving the grievance. City staff also work simultaneously with the investigation to ensure the client has been directed to the appropriate resources as necessary. City staff will take immediate action if necessary upon receiving a grievance, instead of waiting until the grievance can be presented to the committee for follow-up action. Agencies have 5 business days to respond to the City's request for materials regarding the grievance. **Failure by the agency to respond to the grievance notice from the City will result in an automatic decision of substantiating the grievance**

Once all materials, statements, documents, etc. are received from the client and the agency that the grievance is filed against, City staff will bring the grievance to the GRC for deliberation. Committee members vote on whether to substantiate or not substantiate the grievance based on the information presented. Whether the decision is substantiated or not, committee members can recommend actions for the agency to take based upon the nature of the grievance. If a grievance is substantiated, the committee assigns a severity level (Table 1) which can trigger various responses by the City.

Mild Severity	Medium Severity	Extreme Severity
<p>Any grievance that impacts a clients daily living activities that the agency is responsible for, and/or minor building conditions concern.</p> <p>Examples</p> <ol style="list-style-type: none"> 1. Non-life threatening building conditions/cleanliness 2. Not providing essential supplies (such as soap, bed linens, etc.) 3. Poor food quality and/or not being served at timely hours of the day 4. Did not clearly explain policies, procedures, and/or rules to the client 	<p>Any grievance that impacts the dignity and worth of the client served and/or hinders a clients progress towards self-sufficiency and achieving their housing goals.</p> <p>Examples</p> <ol style="list-style-type: none"> 1. Agencies actions violated a programmatic policy or procedure, but not a regulatory requirement 2. Agency provided the client with inadequate case management_ 3. Situation resulted in the client losing a viable housing opportunity or other important document retrieval (ID, social security card, etc.) 4. Reports of client mistreatment by staff (verbal, physical, etc.) 	<p>Any grievance that is life threatening and/or goes against federal regulations.</p> <p>Repeated and/or themes of grievances at the same agency of any severity level.</p> <p>Failure to respond to City's notice of grievance filed against the agency.</p> <p>Examples</p> <ol style="list-style-type: none"> 1. Situation resulted in client being unlawfully exited from shelter or denied entry into shelter 2. Agency actions violated a HUD regulation 3. Agency violated the CoC's Equal'-Discrimination policy (I.e. persons with disabilities, gender, LGBTQ+, race, etc.)

Table 1: Grievance Severity Scale

City Responses to Grievances

Regardless of the severity assigned by the GRC, City staff will collect the recommendations given by the committee and send them to the agency. From the date the agency received the recommendations, they will be required to respond to City staff within 30 business days. The following are possible, but not limited to, responses that the City may take after grievances have been processed by the committee.

Mild Severity Grievances:

- Contacting the provider’s leadership and/or case manager to ensure an adequate and supportive response has been provided to the client. A meeting will be held if necessary.
- Requesting most recent inspection report from the City of Detroit Health Department (DHD), Fire Department, City of Detroit Buildings, Safety Engineering, and Environmental Department (BSEED), and/or any other necessary entities
- Quotes for building repairs and/or pictures of completion of building repairs provided to City of Detroit staff

Medium Severity Grievances:

- Training provided to agency staff and completion of training documentation sent to City staff
- Increased number of scheduled and/or unscheduled visits to site
- Updating of agency policies and procedures

Extreme Severity Grievances:

- Corrective Action Plan(s) Issued
- Contract Violation(s) Issued
- Possible loss of funding

Grievance Appeals

If the client is not satisfied with the Grievance Review Committee's response to the grievance, they will be given the opportunity to file an appeal or request a Case Conference. The Case Conference process is outlined [here](#). If an agency is not satisfied with the GRC's response to the grievance, they will be given the opportunity to file an appeal. If an appeal is filed, the GRC will provide a written response to the appeal within twenty (20) business days. Please note, appeals processes for ESP funded agencies may be different than what is outlined in this policy.

If you wish to file a grievance against an agency with the Detroit CoC, please click [here](#) and/or email or mail to the address below:

Email: coc.coordinator@handetroit.org

Mail: Homeless Action Network of Detroit (HAND) 3701 Miracles Blvd, Suite 101 Detroit, MI 48201

If this grievance is against HAND, it can be submitted to CAM [here](#).

Section 4: Federal Regulations



Overview

All Homelessness Solutions subrecipients are required to follow applicable federal regulations for their program type.

Equal Access Rule

Homelessness Solutions recipients and subrecipients are required to follow the regulations in the Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs final rule, published in the Federal Register on September 21, 2016. This rule ensures equal access to programs and shelters funded by HUD's Office of Community Planning and Development (CPD). Additionally, this rule builds on the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity final rule, published in the Federal Register on February 3, 2012. This rule requires recipients and subrecipients of CPD funding to grant equal access to their program facilities, accommodations, and services in accordance with the individual's gender identity and in a way that creates equal access to the individual's family.

Programs must establish policies and procedures for program admissions, occupancy, and participant privacy and security that align with the requirements established in the Equal Access rules, including the following:

- Make housing available without regard to actual or perceived sexual orientation, gender identity, or marital status.
- Grant equal access to facilities, buildings, benefits, accommodations, and services to individuals in accordance with the individual's gender identity, and in a manner that affords equal access to the individual's family.
- Prohibit any requirements for individuals to prove gender identity (including documentation, ID, etc.). This prohibition also applies to intrusive questioning, including questions about a person's anatomy or medical history.
- Prohibit consideration of a client or potential client's entry into a program because their appearance or behavior does not conform to gender stereotypes.
- Prohibit any segregation of transgender clients (e.g., transgender-only shelter or space). However, if a transgender client requests an accommodation (like a more private space) and the facility can accommodate the request, this is acceptable;
- Base discharges, service restrictions, and warnings following any incidents involving transgender clients only on the individual's behavior, not gender identity.
- Have a zero tolerance for harassment of transgender residents. Staff shall recognize that harassment based on gender identity is discriminatory behavior and will be treated as such. All unacceptable behavior against transgender residents will be dealt with based on the program's behavior policies. Due to the high incidence of harassment of transgender people, concerns about the safety of a transgender resident will be taken with utmost seriousness. Unacceptable behavior

can include harassment, abuse, assault, discrimination, intimidation, threats, violence, and many other forms.

- Permit any clients expressing concern to use bathrooms and dressing areas at a separate time from others in the facility.
- Work (to the extent feasible) with the layout of any shelter facilities to provide for privacy in bathrooms and dressing areas (ESG funds may be used to renovate an emergency shelter to maximize privacy and safety).
- Ensure that policies do not isolate or segregate clients based upon gender identity;
- Take reasonable steps to address any safety or privacy concerns expressed by clients. This may include:
 - Responding to the requests of the client expressing concern through the addition of a privacy partition or curtain.
 - Providing clients the use of a nearby private restroom or office.
 - Providing clients a separate changing schedule.
- Provide all staff (full-time, part-time, and volunteer) and contractors with ongoing training about the program’s policies and the needs, concerns, and realities of transgender people seeking services.

Best practices suggest that where the provider is uncertain of the client’s sex or gender identity, the provider simply informs the client or potential client that the agency provides shelter based on the gender with which the individual identifies.

The following resources provides more information about implementing the Equal Access Rule:

- [HUD Exchange: LGBTQ Homelessness](#)
- [Equal Access for Transgender People: Supporting Inclusive Housing and Shelters](#)

All emergency shelters receiving HUD funding are required by federal law to adhere to HUD’s [Equal Access to Housing Final Rule](#). The Equal Access Rule provides protection for any person or family seeking emergency shelter and removed barriers to access based on gender identity and family composition. No exceptions will be made to the requirements under the law. The City of Detroit stands firmly that all persons requesting shelter and utilizing shelter services are treated with the utmost respect and dignity. Discrimination of any kind will not be tolerated within the Detroit Homeless Service System.

Violence Against Women Act (VAWA)

The VAWA, [24 CFR 576.409](#), prohibits the denial or termination of assistance or eviction solely because an applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking applied upon enactment of VAWA 2013 on March 7, 2013.

As provided under [24 CFR 5.2005\(a\)](#) each subrecipient that determines eligibility for or administers ESG rental assistance is responsible for ensuring that the notice and certification form described under [24 CFR](#)

[5.2005\(a\)\(1\)](#) is provided to each applicant for ESG rental assistance and each program participant receiving ESG rental assistance at each of the following times:

1. When an individual or family is denied ESG rental assistance;
2. When an individual or family's application for a unit receiving project-based rental assistance is denied;
3. When a program participant begins receiving ESG rental assistance;
4. When a program participant is notified of termination of ESG rental assistance; and
5. When a program participant receives notification of eviction.

To ensure the safety of tenants housed in CoC and Emergency Solutions Grant (ESG) funded programs, including tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA), Detroit CoC and ESG funded programs allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit.

All ESG funded programs must adhere to the [Detroit CoC Emergency Transfer Plan](#) that was approved by the Detroit CoC Board of Directors on September 10, 2018.

Americans with Disabilities Act (ADA) Compliance

The City of Detroit requires all ESG-funded shelters to comply with the following [ADA regulations](#):

- The ADA and Section 504 both stipulate that “no otherwise qualified person with disabilities shall, solely by reason of his or her disability, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance. The Fair Housing Amendments Act regulations state “it shall be unlawful for any person to refuse to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford a person with a disability equal opportunity to use and enjoy a dwelling unit including public and private use areas.”
- In cases where an emergency shelter location rotates based on availability of space and the new shelter location cannot accommodate a person's disability, the emergency shelter is responsible for locating and assisting in the transfer of the person in housing crisis to a new and accessible emergency shelter facility. Under no circumstance will any person be denied emergency shelter based on a building's inability to comply with ADA standards or its inability to provide physical accommodations. Emergency shelters who operate with City of Detroit funding and who rotate facilities based on availability or schedules must include written policies and procedures on relocating and securing shelter options when a new site cannot accommodate a person with a disability.

Reasonable Accommodations/Modifications

A reasonable accommodation is a change in rules, policies, or procedures to help people with disabilities access housing or housing-related services.

- For example, a rental office that generally provides standard, printed rental applications could, as a reasonable accommodation to a person with a visual disability, provide a Braille version of the application or provide assistance in filling it out.
- Fair housing laws require housing and shelter providers to consider requests for accommodations by applicants, residents, and, in some limited instances, former residents.
- Housing providers cannot charge money for providing a reasonable accommodation.
- There is no limit to the number of reasonable accommodations requests a person with a disability may make.
- However, if providing the requested accommodation would pose an undue financial or administrative burden on the shelter or housing provider, or if it would fundamentally alter the nature of the program, the request is not “reasonable” and does not need to be granted.

If a prospective client household has requested a reasonable accommodation or modification, an Emergency Shelter provider may ask for verification of the disability and may also request assurances from the person’s healthcare worker or case manager.

A request for a reasonable accommodation should be granted if the following conditions are met:

- The person requesting the accommodation has a disability as defined by fair housing laws.
- The requested accommodation is necessary to afford the person an equal opportunity to use and enjoy the dwelling and related services.
- Complying with the request poses neither an undue administrative nor financial burden on the housing provider or program.
- Complying with the request will not fundamentally alter the nature of the program.

Federal Fair Housing Act

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and disability. For additional information, please see the HUD page on the [Fair Housing Act](#).

Client Confidentiality and Privacy Policies

Subrecipients must have policies and procedures established in writing to ensure that the privacy and confidentiality of all ESG-funded program participants is protected. The ESG interim rule specifically requires that the written procedures ensure the following:

- All records containing personally identifying information (as defined in HUD’s standards for participation, data collection, and reporting in a local HMIS) of any individual or family who applies for and/or receives ESG assistance will be kept secure and confidential.

- The address or general location of a domestic violence, dating violence, sexual assault, or stalking shelter funded through ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter.
- The address and location of any housing of a program participant will not be made public, except as provided under a pre-existing privacy policy of the recipient or subrecipient and consistent with state and local laws regarding privacy and obligations of confidentiality.

Subrecipients must also ensure that confidentiality and privacy policies meet the specific confidentiality and security requirements for HMIS data which are described in the [HMIS Data Standards](#).

It is recommended that policies and procedures include the following, at a minimum:

- Description of how participant files are to be stored and kept secure (e.g., locked files) and who has access to them.
- Assurance that participant files will not be removed from the program premises (or conditions in which this would be permitted).
- Process for obtaining written, informed consent to release participant information to an outside person/agency.
- Description of participant rights to: access their records; request updates to their records; request changes to information in their records with which they do not agree; and file a complaint if they feel their confidentiality has been breached.
- Provisions for training staff on privacy and confidentiality procedures. Training should include the following points:
 - Sharing participant information with other program staff should be limited only to staff directly involved with delivering services to the participant, should only include the information necessary for service delivery, and should occur only using secure methods or in private spaces.
 - Prohibition against sharing any private account information (e.g., usernames, passwords, etc.).
 - Disciplinary action that will result from failing to follow the established privacy and confidentiality policies.

Please note that client confidentiality also applies to City of Detroit and HUD on behalf of the funded program. Any information obtained by City of Detroit and/or HUD staff, as part of a performance review, will be held in the strictest confidence. City of Detroit and/or HUD staff will not include client Personally Identifiable Information (PII) in review working papers or in performance review reports. Additionally, if the City of Detroit or HUD staff asks for client files related to a performance/ monitoring review, then the agency must redact all Personal Identifiable Information (PPI) from any files that are being sent by mail or electronically, unless a secure, encrypted method can be used for electronic transmission.

Homeless Management Information Systems (HMIS) Requirements

All subrecipients are required to use the City of Detroit Homeless Management Information System (HMIS). If a subrecipient is a victim services provider or legal services provider, it may use a comparable database that collects client-level data over time and generates unduplicated aggregate reports based on the data. Information that is entered into a comparable database must not be entered directly into or provided to an HMIS.

As a best practice, all participant data should be entered as close to real-time as possible to ensure accuracy of reported data. The City of Detroit data standards require all data to be entered within 48 hours of entry or exit. The only exception to the 48-hour rule is that shelter providers who have frequent entries and exits (nightly in/out shelters) should not enter and exit clients daily. Instead, those facilities should track clients' attendance over the course of a month (i.e., enter nights the client stayed in shelter on a monthly basis).

All subrecipients are required to report HMIS Universal data elements as well as certain HMIS program-specific data elements for each program participant (including all participants within a family/household). HMIS users should search for participants in HMIS first prior to creating a new client record. Please reference the [Detroit CoC HMIS Policies and Procedures](#), the [HMIS Data Standards](#), and the [ESG Program HMIS Manual](#) for additional information about HMIS data collection requirements.

Section 5:

Overview of ESG Program Components



Overview

In accordance with [24 CFR 576](#), Homelessness Solutions funds must be used for the following activities:

1. Street Outreach,
2. Emergency Shelters (including Warming Centers)
3. Rapid Rehousing
4. Homelessness Prevention
5. Data Collection

In order to ensure comprehensive services to those in housing crisis, these funds are to be used in combination with other federal, state, and local funds as part of a community-wide response to homelessness.

The City of Detroit's Homelessness Solutions funding helps to build the infrastructure of the coordinated entry system. In keeping with the City's commitment to streamline homeless services through coordinated entry, we intend to award a portion of our total allocation to coordinated entry. As we are not the primary funder of this activity, the City will follow the community's decision-making process for coordinated entry funds. We understand that there is a robust evaluation of our coordinated entry system and its processes, including established performance metrics. If a new organization becomes the lead for coordinated entry, we will provide a commitment of grant funds to support their needs within the scope of what is allowable.

Requirements for All Program Components

Subrecipient Agreement Requirements

All organizations awarded funding through the NOFA process will enter into a subrecipient agreement with the City of Detroit. As such, all subrecipients must adhere to all sections of the agreement. All organizations will be required to fully participate in financial audits as required by [2 CFR 200](#), program monitoring to ensure compliance with program regulations, and submit timely monthly and/or quarterly performance reports.

Monitoring

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

Subrecipient Staff Training

In order to ensure those experiencing homelessness are receiving high quality services, all organizations are required to have a staff training plan on the following topics:

- HUD Regulatory Requirements
- ESG Regulatory Requirements
- Housing First
- Fair Housing/Equal Access/Housing Law
- Safety Protocol
- CPR/First Aid
- Client's Rights/Grievance Process
- Trauma Informed Care

HRD has compiled a list of free training materials on some of the topics listed above. This training resource can be found [here](#), using password: housing. This resource also includes posttests that should be completed and kept in staff's file for auditing purposes. In addition, we strongly encourage organizations to utilize all available training provided including training through the Detroit Continuum of Care, the State of Michigan, and other training initiatives.

Please refer to the program specific sections for details on each eligible program type.

Minimum Period of Use

Street Outreach

Street Outreach services must be provided for at least the period of time for which ESG funds are committed for that purpose.

Emergency Shelter

Where ESG funds are used solely for essential services or shelter operations under the Emergency Shelter component, services or shelter must be provided to homeless individuals and families at least for the period during which the ESG funds are provided ([§ 576.102\(c\)\(2\)](#)). In the case of a seasonal shelter, this could be based on the contract period specified in the subrecipient agreement.

Eligible Program Participants

ESG funds may be used to fund eligible activities that benefit either people who are homeless or those at-risk of homelessness. The table below summarizes which populations can be served under each program component. Please refer to the [ESG Program Interim Rule](#) for additional eligibility criteria, as well as those that may be established by the recipient.

Table 2 shows the eligible populations that can be served under each program component. Please refer to [24 CFR 576.2](#) for definitions of “Homeless” and “At Risk of Homelessness”

Program Component	Serving People Who Are Homeless	Serving People at Risk of Homelessness
Street Outreach	X	
Emergency Shelter	X	
Rapid Rehousing	X	
Homelessness Prevention		X

Table 2: Eligible Program Populations

All programs are required to collect and record homelessness status at program entry and exit in HMIS (or a comparable database for domestic violence providers) and in the client’s file.

Termination of Assistance

It is important that providers effectively communicate termination and grievance procedures to participants and ensure that the procedures are fully understood. Posting the policy on a bulletin board in a common area within the facility is an effective way to ensure that the termination and grievance procedures are available for participants to access at any time.

Additionally, all City of Detroit/CoC-funded agencies must include termination policies and procedures in their agency regulations and manuals that meet the guidelines outlined in this section. If a participant violates ESG program requirements, the subrecipient may terminate assistance in accordance with a formal process established by the subrecipient that recognizes the rights of individuals affected. The subrecipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.

The process must recognize the rights of the individuals affected and subrecipients must exercise judgment and examine all extenuating circumstances when determining which violations warrant termination. Assistance should only be terminated in the most severe cases.

For information detailing client termination from a specific program component (e.g., Emergency Shelter, RRH, etc.) please refer to that program component section.

Section 6: Street Outreach



Overview

Street Outreach refers to the activity of providing essential services necessary to reach out to unsheltered persons; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered persons who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility.

Outreach should be utilized as a powerful tool as part of a full continuum of services towards moving individuals and families who are literally homeless from the streets and into stable, permanent housing. It should not be used as a program that seeks to alleviate the burden of living on the streets or provide support to people as a replacement to providing them with independent, stable housing.

In accordance with 24 CFR 576.101(b), Minimum Period of Use, the subrecipient must provide services to homeless individuals and families for at least the period during which ESG funds are provided. This means that the street outreach project must be operational for the entire grant period.

Priorities

Street outreach teams must demonstrate the following priorities:

- Case management that is client-centered and trauma-informed;
- Demonstrate success in connecting clients to mainstream benefits, such as income/employment and health;
- Demonstrate success in exits to permanent housing, with the understanding that households do not first require a shelter stay in order to obtain permanent housing;
- A strong mental health and crisis management service delivery model;
- Participant-driven, and strengths-based service delivery that goes beyond basic needs;
- Flexibility to adjust schedule to meet the needs of those experiencing unsheltered homelessness;
- Ability to provide services on federal holidays; and
- Ability to work outside of standard business hours

Program Components

The City funds street outreach programs to provide a combination of general engagement and housing navigation services. The goal of general engagement is to provide basic needs and connection to emergency shelters to those experiencing unsheltered homelessness. The purpose of the housing navigation component is to connect unsheltered households to permanent housing resources. Both components must be provided by outreach teams.

Important: Homelessness Solutions Street Outreach funded projects operate both general engagement and Housing Navigation activities under one program. The combined component will be referred to as Street Outreach. At minimum, each outreach team will be required to have 1 full time employee (FTE) for housing navigation. All teams will be expected to respond to general engagement /basic needs outreach requests during their hours of operation.

General Engagement Expectations

Services are provided in the streets with a majority of the services provided outside of normal business hours. The goal of general engagement is primarily to develop relationships with unsheltered individuals and connect them with resources including shelter or CAM access points, substance abuse or mental health treatment, and/or mainstream benefits and services. Outreach teams must demonstrate active participation in the chronic by-name-list process and be proactive in coordinating with the Neighborhood Police Officers in the areas of service. Outreach teams must coordinate with the City of Detroit as well as CAM. To meet this need, the City will negotiate hours of operation for the programs, but applicants should plan that at least 50% of the team's regular operations must be outside of normal business hours (between 5pm and 8am). Applicants are expected to mobilize a code blue response during extreme cold conditions defined above. In addition, street outreach teams are expected to respond to City of Detroit outreach requests. Requests must be responded to within 3-48 hours depending upon the urgency level. Outreach requests are made by community members, Detroit Police Department, City of Detroit departments, or other members of the community. Outreach teams are required to follow up with HRD on the outcome of each request.

Housing Navigation Expectations

Services are provided to individuals and families identified through the chronic By Name List (BNL) and City of Detroit processes. Navigation teams provide case management services to work with unsheltered households to get them "document ready" and move them into permanent housing. Document ready is defined as assisting clients with obtaining all documentation needed for permanent housing. This may require working with households on the streets or in drop-in centers and providing transportation.

While navigation staff aren't required to do physical street outreach, they are still required to meet clients in the field and provide transportation as needed for housing related activities. Additionally, the City of Detroit may call on staff during scheduled shifts for targeted outreach and navigation to respond to outreach requests as needed.

Eligibility and Target Population

The recipient or its subrecipient must conduct an initial evaluation to determine the eligibility of each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing. These evaluations must be conducted in accordance with the centralized or coordinated assessment requirements set forth under [§ 576.400\(d\)](#) and the written standards established under [§ 576.400\(e\)](#).

All households served under the street outreach program component must be experiencing unsheltered homelessness within the Detroit CoC. Unsheltered homelessness is defined by the [Homeless Definition Final Rule](#):

Category 1 Literally Homeless: Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

1. Has a primary nighttime residence that is a public or private place not meant for human habitation. Examples of places not meant for habitation include cars, parks, sidewalks, and abandoned buildings.

Street outreach field efforts are to be focused primarily around a CoC defined list of hot spots and identified households through the use of the City's [Outreach Request Form](#). The City of Detroit seeks to ensure outreach services are accessible throughout the Detroit CoC limits. Clients will be assigned by the City of Detroit and the coordinated entry lead agency to street outreach teams as applicable. Outreach teams should prioritize households that are experiencing unsheltered chronic homelessness. For more detail on the definition of chronic homelessness, please see HUD's [Defining "Chronically Homeless" Final Rule](#).

Where one or more outreach and/or navigation teams work in the same area, the City of Detroit expects that agencies collaborate to provide complimentary services by ensuring the following:

- Verify if the person(s) is working with a service provider, such as an outreach team, or housing agency, via HMIS and assist with reconnection.
- A lead case manager/navigator is established through the By-Name List process.
- The agency will lead the case management of the homeless individual until either the individual has been housed, or a more appropriate case manager is ready to take over.
- Other agencies will reinforce this intervention so that agencies are not working against one another.

Eligible Activities

The City of Detroit prioritizes four eligible activities: Engagement, Case Management, Data Entry (HMIS), and Transportation for funding.

Subject to the expenditure limit in [§ 576.100\(b\)](#), ESG funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care by a licensed medical professional to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. For the purposes of this section, the term "unsheltered homeless people" means individuals and families who qualify as homeless under paragraph (1)(i) of the "homeless" definition under [§ 576.2](#). The eligible costs and requirements for essential services consist of:

Engagement

Engagement includes the costs of activities to locate, identify, and build relationships with persons experiencing unsheltered homelessness and engage them for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs. These activities consist of making an initial assessment of needs and eligibility; providing crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; and actively connecting and providing information and referrals to programs targeted to homeless people and mainstream social services and housing programs, including emergency shelter,

transitional housing, community-based services, Permanent Supportive Housing, Rapid Rehousing programs and Project Based Vouchers. Eligible costs include the cost of agency issued cell phones for outreach workers during the performance of these activities.

Case Management

Case Management includes the cost of assessing housing and service needs, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participants. Eligible services and activities include: using the centralized or coordinated assessment system as required under 24 CFR 576.400(d); conducting the initial evaluation required under 24 CFR 576.401(a), including verifying and documenting eligibility; counseling; developing, securing and coordinating services; obtaining Federal, State, and local benefits; monitoring and evaluating program participant progress; providing information and referrals to other providers; and developing an individualized housing and service plan, coordinating medical care as needed, as well as achieving permanent housing stability.

Emergency Health Services

Eligible costs for Emergency Health Services are:

- The direct outpatient treatment of medical conditions and are provided by licensed medical professionals operating in community-based settings, including streets, parks, and other places where unsheltered persons are living.
- ESG funds may be used only for these services to the extent that other appropriate health services are inaccessible or unavailable within the area.
- Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate emergency medical treatment; and providing medication and follow-up services.

Emergency Mental Health

Eligible costs are:

- Direct outpatient treatment by licensed professionals of mental health conditions operating in community-based settings, including streets, parks, and other places where unsheltered people are living.
- ESG funds may be used only for these services to the extent that other appropriate mental health services are inaccessible or unavailable within the community.
- Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances.
- Eligible treatment consists of crisis interventions, the prescription of psychotropic medications, explanation about the use and management of medications, and combinations of therapeutic approaches to address multiple problems

Transportation

The transportation costs of travel by outreach workers, social workers, medical professionals, or other service providers are eligible, provided that this travel takes place during the provision of services, under this section. The costs of transporting persons experiencing unsheltered homelessness to emergency shelters or other service facilities are also eligible. These costs include the following:

1. The cost of a program participant's travel on public transportation
2. Mileage allowance for service workers to visit program participants and transport, if service workers use their own vehicles
3. The cost of purchasing or leasing a vehicle for the recipient or subrecipient in which staff transports program participants and/or staff serving program participants. This includes the cost of gas, insurance, taxes, and maintenance for the vehicle
4. The cost of subrecipient staff time to accompany or assist program participants to use public transportation
5. Train or bus tickets, taxi or rideshare for program participant travel to and from medical care

Services for Special Populations

ESG funds may be used to provide services for homeless youth ages 18-24, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible. The term "victim services" mean services that assist program participants who are victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking. While all the activities listed above are allowable under HUD regulations, the City of Detroit's primary focus is engagement and case management to link unsheltered households with shelter, permanent housing, and other services.

HMIS

ESG funds may be used to pay the costs of contributing data to the HMIS designated by the CoC for the area, including the costs of:

- Purchasing or leasing computer hardware;
- Purchasing software or software licenses;
- Purchasing or leasing equipment, including telephones, fax machines, and furniture;
- Obtaining technical support;
- Leasing office space;
- Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS;
- Paying salaries for operating HMIS, including:
 - Completing data entry;
 - Monitoring and reviewing data quality;
 - Completing data analysis;
 - Reporting to the HMIS Lead;
 - Training staff on using the HMIS or comparable database; and

- Implementing and complying with HMIS requirements;
- Paying costs of staff travel to and attend HUD-sponsored and HUD-approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act;
- Paying staff travel costs to conduct intake; and
- Paying participation feeds charged by the HMIS Lead, if the recipient or subrecipient is not the HMIS Lead. The HMIS Lead is the entity designated by the CoC to operate the area's HMIS.

Performance Benchmarks

The City will require that all Outreach providers track their performance on the following measures:

- Percentage of households that exit to any sheltered destination
- Percentage of households that meet the definition of unsheltered homelessness
- Percentage of households that exit to a permanent housing destination

Performance benchmarks may change from year to year. Any changes will be communicated to subrecipients prior to the start of the grant year.

Severe Weather Policy

All outreach teams are expected to mobilize a code blue response during extreme cold conditions as defined as:

- The temperature drops to **20 degrees Fahrenheit or below**, including the National Weather Service for wind chill values for two hours or more: and/or
- **Ice storms** or **freezing rain** is expected; and/or
- 6 or more inches of **snow** is expected

Please reference Appendix VI for full Severe Weather Policy.

Client Files and Record Keeping

General Program Documentation

Every client who has received a direct service from an ESG subrecipient must have a client file that documents the reason(s) for the assistance. Each file must include the following documentation and/or case note:

- Identification documentation (or case notes documenting efforts to obtain ID)
- Verification of Homelessness upon intake (must be a place not meant for habitation and be re-certified every 30 days.)
- Signed HMIS Release of Information (for all adult members of the household)

- Case notes should reflect the timelines of each engagement/service(s) provided from entry to exit of the outreach program, must be documented a minimum of interactions every 30 days.
- VI-SPDAT
- Intake form (HMIS intake)
- Income verification, including back up documentation or verification of zero income (for all adult members of the household).
- Individualized Housing and Service Plan
- Verification of disability (if applicable)
- Verification of chronicity (if applicable)
- Documentation of emergency health services (if applicable)
- Documentation of emergency mental health services (if applicable)
- Documentation of transportation (if applicable)
- Documentation of ineligibility (if applicable)

As part of the programmatic monitoring process, HRD staff will review a selection of client files for the program year.

Documenting Homelessness

Category 1: Literally Homeless Clients

For applicants who lack a fixed, regular, and adequate nighttime residence, meaning nightly residence may be in: car; park; abandoned building; bus or train station; encampment; airport; camping ground; or hotel and motels paid for by charitable organizations or federal, state or local government programs. For these applicants, any of the following forms of documentation may be used, however the order of priority is as follows:

1. Written observation by the outreach worker
2. Written referral by another housing or service provider
3. Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter

For an individual who is exiting an institution where he/she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution, any of the following forms of documentation may be used:

- Written observation by the outreach worker; or
- Written referral by another housing or service provider; or
- Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter.
- For individuals exiting and institution- one of the forms of evidence above and
 - Discharge paperwork or a written or oral referral or
 - Written record of intake worker's due diligence in to obtain above evidence and certification by individual that they exited institution

Category 4: Fleeting/Attempting to Flee Domestic Violence Clients

For Victim Service Providers:

- An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

For Non-Victim Service Providers:

- An oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the case worker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified.
- Certification by the individual or head of household that no subsequent residence has been identified
- Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

For addition information on HUD's categories of homelessness and documentation of homelessness please reference HUD's [Homeless Definition and Recordkeeping Requirements](#) quick sheet.

Section 7: Emergency Shelter



Overview

In accordance with [24 CFR 576.2](#), and emergency shelter must be a facility, the primary purpose of which is to provide a temporary shelter for persons experiencing homelessness in general or for specific populations of persons experiencing homelessness and which does not require occupants to sign leases or occupancy agreements. ESG may be used to operate the shelter or to provide a range of essential services to the residents. Temporary hotel and motel stays are also permitted under this component if no appropriate emergency shelter is available for a homeless individual or family per [24 CFR 576.102](#). **Program must have prior approve from the City of Detroit in order to use ESG funding for hotel/ motel stays.**

Emergency Shelters and Warming Centers must be low-barrier and accept referrals without any screening criteria. This means that households cannot be screened out of shelter for substance use, mental health, disability, family composition, or gender identity. Additionally, all overnight facilities must take walk-ins after CAM operating hours. Any walk-in households must be referred to CAM the next business day.

Please note that for the purposes of Section 7, the term emergency shelter applies to both year-round emergency shelters and season warming centers unless otherwise noted.

Priorities

All emergency shelters and warming centers must:

- Provide clean and safe overnight shelter
- Have strong housing-focused case management that is client-centered and trauma-informed
- Demonstrate success in exits to permanent housing
- Demonstrate success in connecting clients to mainstream benefits, such as income/employment and health, as shown through HMIS data.
- Offer onsite programs and amenities that go beyond basic needs. Examples include, but are not limited to, quiet spaces, learning labs, onsite health services, onsite employment services, etc.
- Be flexible, participant-driven, and strengths-based service delivery; and
- Allow participants to stay in the shelter during daytime hours

Program Components

The City funds two types of emergency shelters. Both shelter models cannot require occupants to sign leases or occupancy agreements.

Emergency Shelters

An emergency shelter operates year-round to provide overnight shelter to families and individuals experiencing homelessness. Emergency shelters may be population specific, such as those serving youth, Veterans, or domestic violence survivors. All population specific shelters must be approved by the City prior to the start of the grant year.

Warming Centers

Warming Centers operate on a seasonal basis to provide overnight shelter to families and individuals experiencing homelessness during the winter months (typically November through March). This component, along with emergency shelters, operates as a first line of defense during freezing temperatures for those experiencing homelessness.

Eligibility and Target Population

Eligibility

All households served in emergency shelters must meet HUD's definition of homeless as defined in [24 CFR 576.2](#).

Homeless means:

1. An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - i. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
 - ii. An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
 - iii. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;
2. An individual or family who will imminently lose their primary nighttime residence, provided that:
 - i. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
 - ii. No subsequent residence has been identified; and
 - iii. The individual or family lacks the resources or support networks, *e.g.*, family, friends, faith-based or other social networks, needed to obtain other permanent housing;
3. Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
 - i. Are defined as homeless under section 387 of the Runaway and Homeless Youth Act ([42 U.S.C. 5732a](#)), section 637 of the Head Start Act ([42 U.S.C. 9832](#)), section 41403 of the Violence Against Women Act of 1994 ([42 U.S.C. 14043e-2](#)), section 330(h) of the Public Health Service Act ([42 U.S.C. 254b\(h\)](#)), section 3 of the Food and Nutrition Act of 2008 ([7 U.S.C. 2012](#)), section 17(b) of the Child Nutrition Act of 1966 ([42 U.S.C. 1786\(b\)](#)) or section 725 of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11434a](#));

- ii. Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
 - iii. Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
 - iv. Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or
4. Any individual or family who:
- i. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
 - ii. Has no other residence; and
 - iii. Lacks the resources or support networks, *e.g.*, family, friends, faith-based or other social networks, to obtain other permanent housing.

Target Population

Emergency shelters and Warming Centers can be population specific upon approval from the City. The population specific types are:

Single-Sex Shelters

Single-sex shelters can only be operated using HUD funds under the following limited conditions:

- The shelter must serve individuals only. A shelter that accepts families with children cannot be a single-sex facility; and
- The shelter must be considered a “dwelling unit” and must be a single shelter that includes shared bedrooms or bathing facilities. See [24 CFR 578.93, Fair Housing and Equal Opportunity](#), for more information about this policy.

If a facility does not meet the conditions outlined above, then it cannot operate as a single-sex shelter and must serve eligible people of any gender.

Family Shelter

Family shelters accept families with children or couples presenting as family. Families and couples do NOT have to provide proof of marriage as a condition of shelter eligibility as outlined under HUD's [Equal Access to Housing Final Rule](#).

While it is acceptable for a shelter or housing program to limit assistance to households with children, **it may not limit assistance to only women with children**. Such a shelter must also serve the following family types, should they present, in order to be in compliance with the Equal Access rule:

- Single male head of household with minor child(ren); and
- Any household made up of two or more adults, regardless of sexual orientation, marital status, or gender identity, presenting with minor child(ren).

In this example, the emergency shelter is not be required to serve families composed of only adult members and could deny access to these types of families provided that all adult-only families are treated equally, regardless of sexual orientation, marital status, or gender identity.

In accordance with [24 CFR 576.102](#), all shelters are prohibited against involuntary family separation. The age, of a child under age 18 must not be used as a basis for denying any family's admission to an emergency shelter that uses Emergency Solutions Grant (ESG) funding or services and provides shelter to families with children under age 18.

Special Population Shelter

ESG funds may be used to provide services for homeless youth, Veterans, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under [24 CFR 576.102](#). The term victim services mean services that assist program participants who are victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.

Eligible Activities

The HUD ESG Program allows a number of eligible activities as part of the essential services for individuals and families experiencing homelessness and residing in emergency shelters. However, the City of Detroit focuses the bulk of the awards on three eligible activities: Housing-Focused Case Management, Shelter Operations, and Data Entry (HMIS) over other activities. For a complete list of emergency shelter eligible activities refer to [24 CFR 576.102](#).

Emergency shelter activities must be in compliance with the following categories:

1. **Essential Services** to people in emergency shelters (§ 576.102 (a)(1))
2. **Renovation**, rehabilitation, or conversion of buildings to be used as emergency shelters (§ 576.102 (a)(2))

3. **Operation** of emergency shelters (§ 576.102 (a)(3))
4. Assistance required under the **Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970** (URA) (§ 576.102 (a)(4))

In addition to the activities listed under [24 CFR 576.102](#), HMIS activities under [24 CFR 576.107](#) are also eligible.

Essential Services

Housing-Focused Case Management

The goal of emergency shelter is to provide a safe environment for those in a housing crisis AND to ensure that services and support are provided that assist the person to moving into permanent housing. While HUD defines “essential services” widely, the City of Detroit requires all emergency shelters to provide the coordination of or direct housing-focused case management services to all persons experiencing homelessness being served by their agency. Eligible costs include the cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participants. Shelter providers must ensure their case management ratio allows for the implementation of housing-focused case management. Housing-focused case management activities consist of:

- Using the centralized or coordinated assessment system as required under 24 CFR §576.400(d).
- Conducting the initial evaluation required under 24 CFR § 576.401(a), including verifying and documenting eligibility.
- Counseling.
- Developing, securing, and coordinating services and obtaining Federal, State, and local benefits.
- Monitoring and evaluating program participant progress.
- Providing information and referrals to other providers.
- Providing ongoing risk assessment and safety planning with victims of intimate partner violence, dating violence, sexual assault, and stalking.
- Developing an individualized housing and service plan, including planning a path to permanent housing stability.
- Assisting program participants in obtaining permanent housing and required documentation; and
- Case management services, such as housing plans and case notes, and documentation of case management activities in the client’s chart and HMIS when applicable.

Additional Essential Services

Other allowable services under HUD’s Essential Services Definition include the following. **Please note that organizations must request City of Detroit approval prior to putting the following line items in their organizational budget:**

Childcare

The cost of childcare for program participants, including providing meals and snacks, and comprehensive and coordinated sets of appropriate developmental activities, are eligible. The children must be under the

age of 13, unless they are disabled. Disabled children must be under the age of 18. The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.

Education Services

When necessary for the program participant to obtain and maintain housing, the costs of improving knowledge and basic educational skills are eligible. Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED). Component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies and instructional material; counseling; and referral to community resources.

Employment Assistance and Job Training

The costs of employment assistance and job training programs are eligible, including classroom, online, and/or computer instruction; on-the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to program participants in employment assistance and job training programs is an eligible cost. Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates. Services that assist individuals in securing employment consist of employment screening, assessment, or testing; structured job skills and job-seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; counseling or job coaching; and referral to community resources.

Outpatient Health Services

Eligible costs are for the direct outpatient treatment of medical conditions that are provided by licensed medical professionals. ESG funds may be used only for these services to the extent that other appropriate health services are unavailable within the community.

Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate medical treatment, preventive medical care, and health maintenance services, including emergency medical services; providing medication and follow-up services; and providing preventive and non-cosmetic dental care.

Legal Services

Eligible costs are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of the State in which the services are provided, and by person(s) under the supervision of the licensed attorney, regarding matters that interfere with the program participant's ability to obtain and retain housing.

ESG funds may be used only for these services to the extent that other appropriate legal services are unavailable or inaccessible within the community.

Eligible subject matters are child support, guardianship, paternity, emancipation, and legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual

assault, and stalking, appeal of veterans and public benefit claim denials, and the resolution of outstanding criminal warrants.

Component services or activities may include client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling.

Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient's employees' salaries and other costs necessary to perform the services.

Legal services for immigration and citizenship matters and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are ineligible costs.

Life Skills Training

The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance use, and homelessness are eligible costs. These services must be necessary to assist the program participant to function independently in the community. Component life skills training is budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting.

Mental Health Services

Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions. ESG funds may only be used for these services to the extent that other appropriate mental health services are unavailable or inaccessible within the community.

Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances. Problem areas may include family and marital relationships, parent-child problems, or symptom management.

Eligible treatment consists of crisis interventions; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.

Substance Abuse Treatment Services

Eligible substance abuse treatment services are designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors and are provided by licensed or certified professionals.

ESG funds may only be used for these services to the extent that other appropriate substance abuse treatment services are unavailable or inaccessible within the community.

Eligible treatment consists of client intake and assessment, and outpatient treatment for up to 30 days. Group and individual counseling and drug testing are eligible costs. Inpatient detoxification and other inpatient drug or alcohol treatment are not eligible costs.

Transportation

Eligible costs consist of the transportation costs of a program participant's travel to and from medical care, employment, childcare, or other eligible essential services facilities. These costs include the following:

- The cost of a program participant's travel on public transportation.
- If service workers use their own vehicles, mileage allowance for service workers to visit program participants
- The cost of purchasing or leasing a vehicle for the recipient or subrecipient in which staff transports program participants and/or staff serving program participants, and the cost of gas, insurance, taxes, and maintenance for the vehicle.
- The travel costs of recipient or subrecipient staff to accompany or assist program participants to use public transportation.

Services for Special Populations

ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under paragraphs (a)(1)(i) through (a)(1)(x) of 24 CFR 576.102. The term victim services mean services that assist program participants who are victims of intimate partner violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning intimate partner violence, dating violence, sexual assault, or stalking.

Organizations must state if they plan to serve a special population during the NOFA application process.

Renovation

Nonprofits and units of local government may use ESG funds to renovate or rehabilitate buildings for the use of the building as an emergency shelter.

Shelter providers seeking City of Detroit funds for shelter renovation cannot use their grant award in this manner without advance approval from the City of Detroit. Organizations who feel they need renovation assistance should reach out to their project manager to discuss their request.

Environmental clearance on properties is required in advance of starting work.

Eligible costs include labor, materials, tools, and other costs for renovation (including major rehabilitation of an emergency shelter or conversion of a building into an emergency shelter).

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Minimum Period of Use

Renovated Buildings

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

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

Essential Services and Shelter Operations.

Where the recipient or subrecipient uses ESG funds solely for essential services or shelter operations, the recipient or subrecipient must provide services or shelter to homeless individuals and families at least for the period during which the ESG funds are provided. The recipient or subrecipient does not need to limit these services or shelter to a particular site or structure, so long as the site or structure serves the same type of persons originally served with the assistance (*e.g.*, families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or serves homeless persons in the same area where the recipient or subrecipient originally provided the services or shelter.

Maintenance of Effort

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

Shelter Operations

Eligible costs for shelter operations are the costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter. Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual.

Assistance required under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA).

Eligible costs are the costs of providing URA assistance under [§ 576.408](#), including relocation payments and other assistance to persons displaced by a project assisted with ESG funds. Persons that receive URA

assistance are not considered “program participants” for the purposes of this part, and relocation payments and other URA assistance are not considered “rental assistance” or “housing relocation and stabilization services” for the purposes of this part.

HMIS

ESG funds may be used to pay the costs of contributing data to the HMIS designated by the CoC for the area, including the costs of:

- Purchasing or leasing computer hardware.
- Purchasing software or software licenses.
- Purchasing or leasing equipment, including telephones, fax machines, and furniture.
- Obtaining technical support.
- Leasing office space.
- Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS;
- Paying salaries for operating HMIS, including:
 - Completing data entry.
 - Monitoring and reviewing data quality.
 - Completing data analysis.
 - Reporting to the HMIS Lead.
 - Training staff on using the HMIS or comparable database; and
 - Implementing and complying with HMIS requirements.
- Paying costs of staff travel to and attend HUD-sponsored and HUD-approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act.
- Paying staff travel costs to conduct intake; and
- Paying participation feeds charged by the HMIS Lead, if the recipient or subrecipient is not the HMIS Lead. The HMIS Lead is the entity designated by the CoC to operate the area’s HMIS.

Performance Benchmarks

The City of Detroit requires that all emergency shelter and warming center providers track their performance on the following measures:

- Shelter utilization must be at 90% according to the APR/ CAPER.
- Percentage of exits to a permanent housing destination.

Shelter Habitability and Lead Requirements

Habitability

All City of Detroit funded emergency shelters must have a current Certificate of Occupancy from the City of Detroit Building, Safety, and Engineering Department (BSEED) and shall comply with all applicable City, State, and Federal fire, environmental, health, and safety standards and regulations. When ESG funds are

used under the emergency shelter component for renovation or shelter operations, the building must meet the minimum standards for safety, sanitation, and privacy. This applies to all ESG funds used under this component, including match funds. Grantees may also establish standards that exceed or add to these minimum standards:

- Structure and materials: The shelter building must be structurally sound to protect residents from the elements and not pose any threat to the health and safety of the residents. Any renovation (including major rehabilitation and conversion) carried out with ESG assistance must use Energy Star and WaterSense products and appliances.
- Access: The shelter must be accessible in accordance with Section 504 of the Rehabilitation Act (29 USC. 794), implementing regulations at 24 CFR part 8, the Fair Housing Act (42 USC. 3601 et seq.) and implementing regulations at 24 CFR part 100; and Title II of the Americans with Disabilities Act (42 USC. 12131 et seq.) and 28 CFR part 35; where applicable.
- Space and security: Except where the shelter is intended for day use only, the shelter must provide each program participant with an acceptable place to sleep and adequate space and security for themselves and their belongings.
- Interior air quality: Each room or space within the shelter must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.
- Water supply: The shelter's water supply must be free of contamination.
- Sanitary facilities: Each program participant in the shelter must have access to sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.
- Thermal environment: The shelter must have any necessary heating/cooling facilities in proper operating condition.
- Illumination and electricity: The shelter must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the shelter.
- Food preparation: Food preparation areas, if any, must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.
- Sanitary conditions: The shelter must be maintained in a sanitary condition.
- Fire safety:
 - There must be at least one working smoke detector in each occupied unit of the shelter. Where possible, smoke detectors must be located near sleeping areas.
 - The fire alarm system must be designed for hearing-impaired residents.
 - All public areas of the shelter must have at least one working smoke detector.
 - There must also be a second means of exiting the building in the event of fire or another emergency.

Per the City's subrecipient agreement, subrecipients must immediately report problems, delays, or adverse conditions which materially affect the ability to complete the Project or prevent the meeting of time schedules, or material changes to the site in which services are being provided. This disclosure shall be accompanied by a statement of the action taken, or contemplated, by the Subrecipient and any City assistance needed to resolve the situation.

See Appendix VII for additional information.

Lead Based Paint Requirements

The ESG interim rule establishes the following regarding lead-based paint remediation and disclosure:

The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821- 4846), the Residential Lead- Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851- 4856), and implementing regulations in [24 CFR part 35](#), subparts A, B, H, J, K, M, and R apply to all shelters assisted under ESG program and all housing occupied by program participants.

Under these regulations, facilities must be inspected to ensure there is no risk of exposure to lead-based paint hazards. If hazards are identified, action must be taken to address these hazards. If an emergency shelter falls under the definition of a zero-bedroom dwelling, it is exempt under the statute. Zero-bedroom dwelling is defined as follows:

- Any residential dwelling in which the living areas are not separated from the sleeping area. The term includes efficiencies, studio apartments, dormitory or single room occupancy housing, military barracks, and rentals of individual rooms in residential dwellings.
- The term “single room occupancy housing” is defined as follows:
 - Housing consisting of zero-bedroom dwelling units that may contain food preparation or sanitary facilities or both.

If an ESG-funded program provides shelter with units that have one or more bedrooms and receive assistance for more than 100 days, the program is required to establish and implement a policy that ensures that child-occupied spaces are free of lead-based hazards. If a program is exempt from the regulation (zero-bedroom units or receives assistance for 100 days or less), HUD recommends that policies to ensure lead safe living environments are implemented when units are occupied by children under six years old.

Please refer to Appendix V for additional information.

Required Policies and Procedures

All City of Detroit funded shelters must have written policies on the items listed in this section. In addition, shelter operating policies need to be communicated to clients.

The diagram from the National Alliance to End Homelessness (NAEH) below shows the keys to operating a successful emergency shelter. All shelters are required to adapt these five focuses into their daily operations.

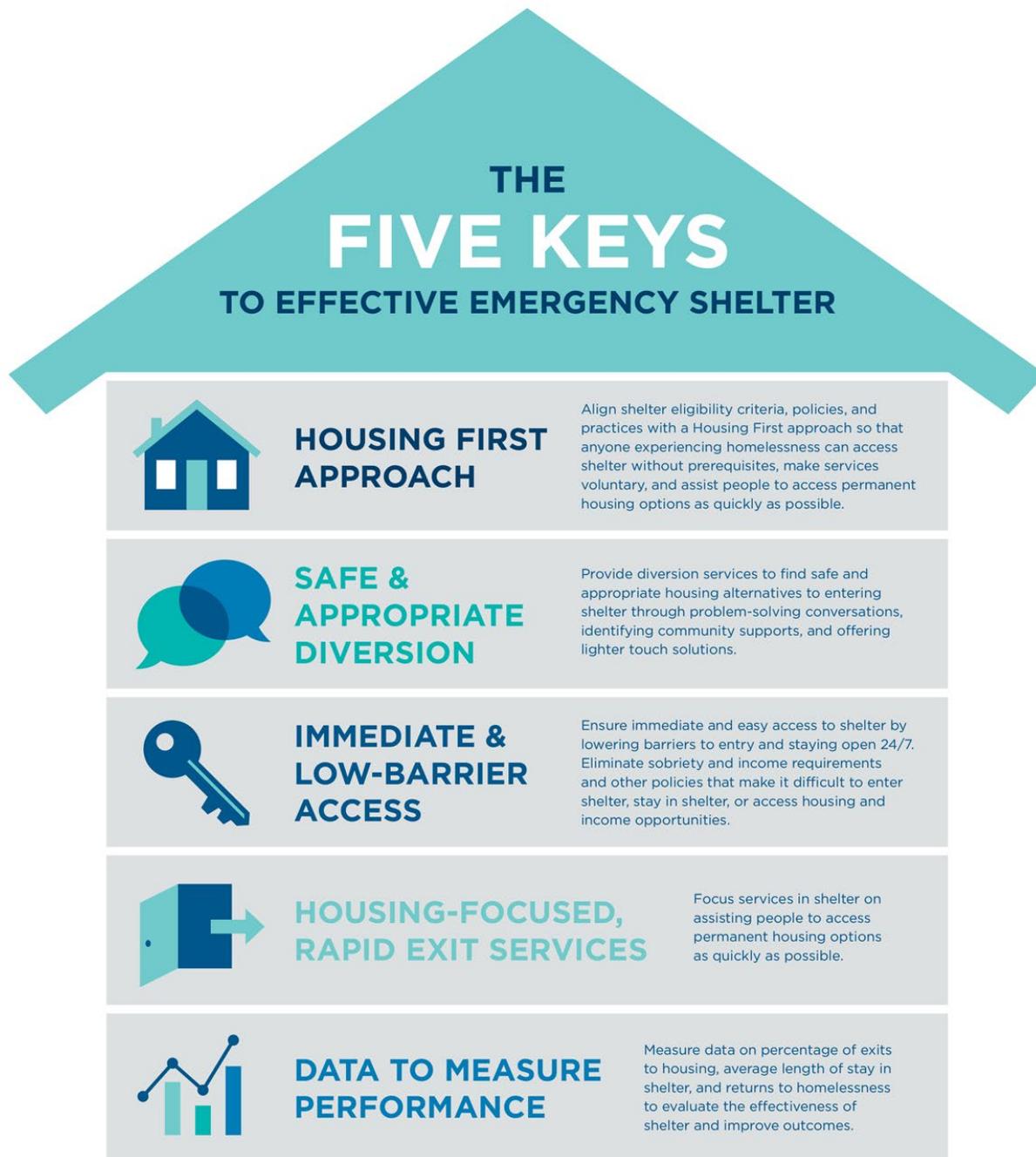


Figure 1: NAEH, *The Five Keys to Effective Emergency Shelter*

Low-Barrier

Low-barrier services and housing place a minimum number of expectations on people requesting assistance. The aim is to have as few barriers as possible to allow more people access to services. This

model means that program participants are not expected to abstain from using alcohol or other drugs, or from carrying on with street activities while engaging in services or living on-site, so long as they do not engage in these activities in common areas and are respectful of other tenants and staff. Low-barrier facilities follow a harm reduction philosophy. Potential guests have the ability to access services at any time of the day or night, with or without a referral from CAM.

For more information on how to successfully implement a low-barrier shelter model, please refer to the Interagency Council on Homelessness, "[Key consideration for implementing Emergency Shelter Within an Effective Crisis Response System.](#)"

What does it look like in action?

- Place: The doors and space are open and accessible.
- Presentation: The people are open, friendly, engaging, making everyone feel welcome and tuning in to different people's needs and styles.
- Practice: Start where consumers present; accept challenging behavior; use assessment skills to build on strengths and develop plans. Maintain an inclusive approach to the work.

What low-barrier is not:

- A service model in and of itself
- A specific social work approach
- An outcome or a program goal
- A simple way of measuring a program's success
- A "no barrier" or "no rules" or "no expectations" approach to social work

Involuntary Family Separation

HUD issued regulations that prohibit all shelters from denying access to families based on the age of a child. This requirement has been issued through the HEARTH Act and through the ESG Interim Rule. All City of Detroit and CoC-funded emergency shelters and transitional housing facilities will comply with this requirement and have policies and procedures that reflect this. Non-compliance may result in removal of ESG/CoC funds. Please see the following HEARTH Act language on family separation:

- **SEC. 404. PREVENTING INVOLUNTARY FAMILY SEPARATION.** '(a) IN GENERAL: any project sponsor receiving funds under this title to provide emergency shelter, transitional housing, or permanent housing to families with children under age 18 shall not deny admission to any family based on the age of any child under age 18.)
- EXCEPTION: Notwithstanding the requirement under subsection (a), project sponsors of transitional housing receiving funds under this title may target transitional housing resources to families with children of a specific age only if the project sponsor:
- Operates a transitional housing program that has a primary purpose of implementing an evidence-based practice that requires that housing units be targeted to families with children in a specific age group.

- Provides such assurances, as the Secretary shall require, that an equivalent appropriate alternative living arrangement for the whole family or household unit has been secured.

ESG Interim Rule language on family separation:

- **(b) Prohibition against involuntary family separation.** The age, of a child under age 18 must not be used as a basis for denying any family’s admission to an emergency shelter that uses Emergency Solutions Grant (ESG) funding or services and provides shelter to families with children under age 18.

Religion

Religion plays an important role in many people’s lives. Additionally, many homeless service system agencies were founded through religious organizations and mission driven activities. Regardless of an agency’s background, any emergency shelter receiving City of Detroit funding must allow all persons staying in or receiving services to freely practice any religion or spiritual belief that they adhere to, or none at all if that is the case. In the cases of faith-based shelters that provide religious services, emergency **shelter staff must clearly explain that any and all religious activities at the shelter are voluntary and not expected as a condition of stay.**

Service Animals

Persons seeking emergency shelter or housing services cannot be denied based on their need for a service animal under the [American with Disabilities Act](#). Only dogs and some horses can be service animals (no other pets). There are no requirements that a service dogs must meet. In addition to the American with Disabilities Act, HUD’s [Fair Housing Act](#) also applies to persons seeking or staying in emergency shelter. Under the Fair Housing Act, shelters receiving HUD funding cannot deny a person access to shelter or services based on their need for a support animal including for emotional support. To clearly distinguish between a support animal and a pet, emergency shelters may ask only two questions:

1. Does the person seeking to use and live with the animal have a disability?
2. Does the animal work, provide assistance, perform tasks or services for the benefit of a person with a disability, or provide emotional support that alleviates one or more of the identified symptoms or effects of a person’s disability?

If the answer to question 1 or 2 is NO, a shelter is not required to make an accommodation. If the answer to question 1 **AND** 2 is YES, then both Section 504 of the American with Disabilities Act and HUD’s Federal Fair Housing Act require the emergency shelter provider to make accommodations and allow the support animal to remain with its owner for the duration of the person’s stay.

Emergency shelters and/or service providers cannot require additional documentation regarding the service animal or the nature of the person’s disability.

Reasons for Service Animal Denial

Answering yes to both questions listed above does not give a free pass for any animal to stay in emergency shelter. Shelters should have written policies outlining the determination of service animals as well as the control and care for which their owners need to be responsible.

Shelter policy should include the following:

All service animals must be harnessed, leashed, tethered, or contained and under the control and guidance of their owner at all times.

- All service animals must behave properly, while on shelter/agency property.
- The animal's owner accepts all responsibility for the care and well-being of the animal including behavior, sanitation, and clean-up.
- Animals may be denied entrance to the shelter if:
 - The specific animal in question poses a direct threat to the health or safety of others that cannot be reduced or eliminated by another reasonable accommodation, or
 - The specific service animal in question would cause substantial physical damage to the property of others that cannot be reduced or eliminated by another reasonable accommodation.
- Breed, size, and weight limitations may not be applied to a service animal

Resident Death

As death too is a fact of life, emergency shelters receiving City of Detroit funding must enact written protocol on staff procedures and documentation when a person in housing crisis dies on the premises. All agencies' protocol must include the following:

In case of death, staff should:

- Call 911.
- DO NOT move the person or touch anything in the vicinity of the body.
- Call a second staff member for support.
- Inform the Shelter Manager or supervisory personnel.
- The Shelter Manager or supervisory personnel is required to inform the senior level staff (e.g., Executive Director, Chief Operating Officer) as soon as possible.
- All staff involved in the incident must provide documentation of events and actions taken within 24 hours of death.
- Maintain confidentiality and composure. Even post-mortem, client information should not be made public or available to anyone outside the scope of their release of information.

Resident Personal Belongings

All City of Detroit funded emergency shelters funded are required to have written policies and procedures on personal belongings and property in possession of those seeking shelter.

Emergency shelters have the right to limit the amount or size of belongings either stored or transported in and out of shelter facilities. Shelters that choose to limit the number of personal belongings should assist in locating alternative storage locations so that persons in housing crisis are not required to dispose of personal belongings as a condition of shelter stay.

Resident Money and Valuables

Persons residing in communal living spaces often have difficulty locating safe storage options for their valuables and/or money. City of Detroit funded emergency shelters must include in their policies a protocol for persons seeking shelter to store their money and or valuables in a safe location. Under no circumstances are staff of emergency shelter services allowed to hold or store valuables. Emergency shelters that do offer safe storage options for valuables should detail how items will be stored, the storage and retrieval processes, as well as the days and times that assigned staff will be available to safely store items.

Resident Prescription Medications

Emergency shelters funded by the City of Detroit are required to have written policies and procedures on prescription medication storage and distribution for persons staying in shelter. Shelters without on-site medical staff who are qualified to administer medication should include protocol on medication storage, access, and self-administration. Refrigeration should also be made available for all medications requiring it. Medications may not be stored in communal refrigeration or in unlocked areas. Appropriate record-keeping and client/staff login procedures should also be detailed in the shelter policies. Under NO circumstances are non-approved staff allowed to administer or distribute prescription medications.

Substance Use

Alcoholism and past illicit drug use are considered disabilities under Federal Fair Housing laws and are not a basis for denying a person housing and/or shelter. Emergency shelter providers are prohibited from asking a prospective client/household if they have history of either alcohol abuse or illegal drug use during intake. Additionally, asking a shelter resident with a known history of past drug or alcohol abuse to prove that they are not still using is illegal.

Fair housing laws prohibit questions about treatment or requests for verification that a person is no longer using. Stereotypes about people with substance abuse disabilities (such as, “once a user, always a user”) must not be used to make decisions about access to shelter. Current illegal drug use is a permissible topic that an emergency shelter provider may question a prospective shelter resident about only if the same question(s) are posed to each prospective shelter resident. Current illegal drug use is not a protected disability under Fair Housing laws; however, emergency shelter providers cannot single out certain individuals for questions about current illegal drug use.

While drugs and alcohol may not be allowed on the premises, Detroit’s emergency shelters provide service to many clients who are actively using these substances as they need safe environments to stay in. **Detroit emergency shelters aim to offer a non-judgmental approach that attempts to meet clients “where they are at” with their substance abuse.** Instead of denying services to clients who are using, shelter and

service providers must try to give opportunities for the clients to minimize the harms associated with substance abuse. Additionally, emergency shelter agencies must have written policy and procedures on overdose detection and response.

In cases where persons in housing crisis continue to use on site the following protocol should be followed:

- Staff will not ask clients to be abstinent, only inform clients that they cannot use in the shelter.
- Utilizing harm reduction, staff should help clients recognize that some ways of using substances are clearly safer than others.
- Staff should recognize that the realities of poverty, class, racism, social isolation, past trauma, sex-based discrimination, and other social factors affect clients' vulnerability to and capacity for effectively dealing with substance use.
- Staff should assist clients in accessing services appropriate to their needs.

Manufacturing, Distribution or Sales

Under no circumstances is manufacturing, distribution, or sale of any illegal or prescribed substance permitted in, on, or around City of Detroit emergency shelter facilities. Evidence of staff or persons seeking shelter involvement in these activities will result in removal from the property and may result in temporary or long-term refusal of services. If a resident is dismissed, the organization must report the discharge, suspension, or ban in the "incident" section in HMIS within 24 hours.

Weapons

Many persons requesting emergency shelter are forced to travel with all or most of their personal belongings. In some cases, persons requesting or staying in emergency shelters may have legal or illegal weapons in their possession. Shelter staff will make the determination as to what constitutes a weapon. Shelter staff must notify all persons entering shelter of their weapons policies. Each individual City of Detroit funded emergency shelter must have a written policy and procedure detailing both what constitutes a weapon and how staff should proceed once a weapon has been identified. Policies and practices on identifying and securing weapons must be clearly outlined in public spaces for persons seeking shelter or services to see and presented in a manner that is clear and easy to understand.

Work tools and any other devices which may be used in a way that could cause serious bodily injury must also be reported to shelter staff. Emergency shelter staff must notify all persons requesting entrance into shelter of weapons policies and procedures. Shelter staff will follow agency weapons protocol to ensure the safety of all persons being served. Attempts to bring weapons into a City of Detroit emergency shelter without notifying staff may result in an immediate denial of service or stay. If a resident is dismissed, the organization must report the discharge, suspension or ban in the "incident" section in HMIS within 24 hours.

Violent Behavior

The City of Detroit strongly encourages staff to use de-escalation practices in any tense or escalating emergency shelter situation. Emergency shelter policy and procedures will outline shelter protocol for both de-escalation practices and for when a situation escalates to an unsafe environment. Such protocols may include:

- A client will be told to leave the shelter when staff has witnessed the person, or they have admitted to, being violent or physically intrusive inside the shelter, or they have repeatedly targeted another individual. This includes:
 - Hitting, kicking, slapping, pushing
 - Throwing objects at someone
 - Any unwanted physical contact
 - Being verbally abusive repeatedly to the same person

Shelter Policy may read:

1. Staff will intervene in a conflict in the shelter and encourage those involved to resolve disagreements respectfully, offer to mediate, and name abusive behavior.
2. Staff will prioritize being in common areas with clients when tensions are high.
3. Whenever possible, the decision to tell a client to leave should be discussed with the manager or another support worker.
4. When a client has assaulted anyone in the shelter or been physically intrusive or aggressive (including unwanted touching) and staff have seen it, or the person has admitted it, an appropriate referral out of the shelter should be made.
5. Staff should be honest with the client about why they are being asked to leave. If possible, help the person with their plans and provide him/her with alternatives. Staff should remain non-judgmental.
6. The client may react angrily, and staff may be the target of that anger. If a staff member is concerned about personal safety and they are on a shift alone, call in another staff person before talking with the client and, if necessary, notify the police. Notify the Shelter Manager immediately and complete an Incident Form.
7. Report discharge, suspension, or ban in the “Incidents” section in HMIS within 24 hours.

Case Management Services

While the immediate goal of emergency shelter is to ensure that those in housing crisis are sheltered and safe, once this has been established shelter providers are expected to help residents leave the facility as quickly as possible to permanent housing. All shelters are expected to have access to housing case management services on site and provide clients with linkages to other assistance such as mental or physical health treatment, legal services, and more. Housing case management services and the documentation of them must include, at a minimum, the following:

- Detailed case notes to document services provided to clients should be entered into HMIS first and foremost but can also be entered into a client paper chart.

- A housing plan that was created within 14 days of shelter entry, either via HMIS or comparable database, to document client housing goals and support needed to achieve the goal.
- Case management progress must be made available for review.
 - Prior to grant award, organizations should designate whether they will be tracking services via HMIS or a comparable database.
- Domestic Violence shelters only: Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking

Serving Families with School-Aged Children

The educational needs of children and youth must be accounted for, to the maximum extent practicable. Families with children and unaccompanied youth must be placed as close as possible to the school of origin so as not to disrupt the children’s education. Projects that serve homeless families with children and/or unaccompanied youth must have policies and practices in place that are consistent with the laws related to providing educational services to children and youth. These recipients must have a designated staff person to ensure that children and youth are enrolled in school and receive education services. Homeless families with children and unaccompanied youth must be informed of their eligibility for McKinney- Vento education services and other available resources. Recipients shall maintain documentation in the participant’s case file to demonstrate that these requirements have been met and that applicants and clients understand their rights.

Mandated Reporting

The Michigan Child Protection Law, 1975 PA 238, MCL 722.621 et. seq., requires the reporting of child abuse and neglect by certain persons (called mandated reporters) and permits the reporting of child abuse and neglect by all persons. The [Child Protection Law](#) includes the legal requirements for reporting, investigating, and responding to child abuse and neglect. This document is to assist mandated reporters in understanding their responsibilities under the Child Protection Law. For copies of the Child Protection Law, contact the local Michigan Department of Health and Human Services (MDHHS) office or go to www.michigan.gov/mdhhs.

Shelter providers and service coordination staff may be considered mandated reporters under the statute. Please refer to above mentioned documents for clarification. Regardless of staff capacity, all City of Detroit funded emergency shelters are required to have written policies and procedures outlining protocol for when child abuse is suspected or witnessed.

Criminal History

While permissible to inquire about a person’s criminal convictions, Emergency Shelter providers should keep the following in mind:

- What is the programmatic intent of the questions being asked?
- Will additional barriers be created as a result of these questions?
- Are all applicants asked the same questions?

It is important that a shelter provider uniformly reject all applicants with the same criminal history (except in those cases in which a reasonable accommodation has been granted). If there are specific convictions that would warrant a rejection, this information should be clearly articulated in the organization's policies and procedures to ensure that they are enforced in a standardized way. Barriers to entry should be avoided to the greatest extent possible.

HIV/AIDS

Fair Housing laws recognize HIV-positive status as a disability. Discrimination of any kind against people with HIV or a violation of their right to confidentiality is illegal. While shelter providers may be aware of one or more HIV-positive individuals, there could also be other individuals with HIV receiving shelter. To prevent the spread of HIV, universal precautions against transmission should be taken at all times. Universal precautions are procedures used to handle the blood, body fluids, open skin or mucous membranes (e.g., inside of the mouth or nose) of all individuals, regardless of whether they are known to have HIV or hepatitis. Such precautions allow the isolation of potentially harmful fluids, without isolating individuals.

Universal precautions can be posted above sinks and in other locations in shelters for all staff and residents to follow. Universal precautions include:

- Treating all blood and body fluids as if they are infected with HIV or hepatitis
- Wearing latex gloves when touching blood or body fluids
- Using bleach to clean up any blood spillages
- Washing hands with soap and running water after removal of gloves
- Disposing of latex gloves by rolling them up and placing them in plastic bags.

Ask a local AIDS service organization or contact the federal Centers for Disease Control for more detailed information or pamphlets about universal precautions.

Exit and Termination Policies

Persons experiencing homelessness should only be banned from a shelter as a last resort.

The City of Detroit recognizes that emergency shelter is used by persons who are in housing crisis. Staff must find a balance in providing a safe, communal environment and serving persons who are both entering with high vulnerability and long histories of trauma. If a client has repeated instances of inappropriate behavior that jeopardizes the safe and communal atmosphere of the shelter, a client may be given warnings; placed on daily assess or evicted; or barred for a period of time. All emergency shelters will have written policies and procedures that detail termination of services and reflect the following:

Warnings

If a person utilizing emergency shelter services disregards a shelter policy and is not receptive to being told by staff that it is unacceptable behavior, they will be given a warning. It is important that the person be made clearly aware of why they are being given the warning. If the person receives too many warnings

about the same unacceptable behavior, they may be asked to leave. However, if a person has several warnings on file, but on different topics, then they will not be asked to leave.

Suspension

A suspension is when a homeless service provider restricts shelter and/or services to a person for up to three (3) days. If the person is in need of shelter, the suspending agency is responsible for making a referral to the CAM Access Point to be connected with available shelter beds. Any person/household suspended from a City of Detroit funded-emergency shelter must be recorded in the HMIS system within 24 hours of the suspension in order to prevent future referrals.

Bans

A service provider has the right and responsibility to protect the safety of their staff and persons in housing crisis. In extreme cases, such as physical violence or the use of a weapon, it is clearly understood that any of the agency's authorized staff may choose to suspend a person for cause. During that time, a ban may or may not be considered.

Disciplinary action shall be proportional to the infraction. A ban should be used in only the most extreme circumstances because of the devastating effect losing services has on a person.

Each shelter shall designate which staff are authorized to ban a person from that shelter, preferably those with social service and conflict management skills. The shelter shall have a goal of objectivity in the process and utilize bans only as a last resort.

All organizations are expected to have clearly outlined policies that describe when and how people would be banned. Policies and procedures regarding the banning process shall:

- Be developed and approved by the City of Detroit
- Be easily understandable to persons in housing crisis and shared upon entry
- Be conspicuously posted and periodically communicated to both frontline staff and to persons in need of emergency shelter services and:
 - State that a decision to ban cannot be unilaterally made. Recommendations on banning must be approved by a two-step process.
 - Include an appeals process. If a client is banned, they shall have the right to appeal to a senior authority at the agency.
 - Incorporate the Grievance Procedure.
- If a ban is to be imposed, the agencies shall make every attempt to communicate the following to the person in writing:
 - The reason for the ban
 - The duration of the ban (cannot exceed 6 months unless under extreme circumstances)
 - Any conditions or stipulations imposed
 - A referral to an alternative service provider, if feasible. (The agency shall make every attempt to find the client an available alternative agency that provides equivalent services or keep a record of why the referral was not possible.)

- A description of the agency’s appeals process; and a copy of the Grievance Procedures.
- The client shall be notified that they have a right to file a grievance with the shelter provider if they believe they have been treated unjustly.
- Records: For each banning incident, confidential standardized records shall be kept. Emergency shelter staff will report all persons banned into HMIS within 24 hours to ensure the person in housing crisis does not get referred back to the same shelter.
- Time Limit: Any person who is banned for more than a six-month period may file an appeal with the agency six months from the date of his or her discharge and again every six months after that. A ban may not last longer than a six-month period from the date the incident occurred unless written authorization has been obtained from the City of Detroit program manager and has been uploaded in HMIS.

While bans are made at the agency level, it is imperative that this information should also be shared with CAM as the entity that places clients in shelter programs. Within 24 hours of the decision to ban a client, this information must be entered in HMIS via incidents tab on the client profile. This allows for successful placement but also for an effective risk assessment for the City of Detroit homeless service system. Bans will not be honored unless entered in HMIS. Bans should not exceed more than 6 months unless in extreme cases and must be program specific, meaning they cannot be applied to other ESG funded programs without due cause. If an agency has more than one shelter program, and a client is issued a ban, the ban cannot be applied to other shelter programs the agency is operating.

Involuntary Discharge

In some cases, Emergency shelter staff may require a person to be discharged on an involuntary emergency basis. The Shelter Manager must sign off on the decision to ask a person/household to leave. Employees have an obligation to assist such exiting households in linking to other appropriate services prior to leaving the shelter. This may include, among other things, making referrals or providing resources for clients to follow up with. Staff should always remain non-judgmental in their approach to the client. Be honest with the person about why they are being asked to leave.

The individual being discharged may react angrily to the involuntary discharge and staff may be the target of that anger. If there are concerns that this may happen, staff should ensure that there is another staff person or a support person with them during the procedure.

Appeal Process

If a client expresses a concern or makes a complaint concerning their involuntary discharge, they may take the following steps:

- Discuss the matter fully with the Shelter Manager, who will decide on any corrective action required within the boundaries of his/her authority. The Shelter Manager will notify the Executive Director of the person’s concerns and the action taken.
- If still unsatisfied with the outcome, the person/household may submit a request for intervention to the Executive Director, who will acknowledge receipt within five days. The Executive Director

will take any corrective action required within 10 days and inform the client, in writing, of the resolution.

- Individuals/households have the right to ask assistance of another person to speak on their behalf or help fill out a consumer grievance form.
- Individuals/household grievances are reported to the City of Detroit. The CoC Grievance Committee reserves the right to review grievances to provide review that does not involve the person about whom the complaint was made or the person who reached the decision.
- Copies of all documents are placed in the client file.

Participant Discharge/Termination of Assistance

If an ESG program participant violates program requirements, a homeless service system agency may terminate assistance given that they follow a formal process that has been established by the agency. The process must recognize the rights of the individuals affected and subrecipients must exercise judgment and examine all extenuating circumstances when determining which violations warrant termination. Assistance should only be terminated in the most severe cases.

Discharge Procedure

The goal of emergency shelter is both to provide a safe environment for persons in housing crisis AND to provide services and coordination that ensure that a person's housing crisis is rare and brief. Emergency shelters that receive City of Detroit funding must develop discharge policies and procedures that detail reasons for discharge, staff efforts, exit location and connection to services. The City of Detroit emergency shelters must ensure that when service is terminated, either voluntarily or involuntarily, employees follow an orderly and respectful process. Shelters are strongly encouraged to connect with CAM 15 days prior to a household's discharge if they are still in need of emergency shelter.

Discharge may occur when the person in housing crisis:

- Achieves their goals and is ready to discontinue service
- No longer wants to stay at the shelter and receive service
- Refuses to adhere to the policies and procedures of the shelter (e.g., violent behavior or weapons possession)
- Has needs that exceed the resources and expertise of the shelter.

Discharge Checklist

As a person prepares for discharge, staff should use the following checklist to ensure an orderly and comprehensive discharge and file closing process:

- Wrap up case planning with the client
- Complete a discharge/aftercare plan with the person exiting
- Record the reason for discharge
- Make appropriate referrals where external aftercare is required
- Ensure all personal property in the person's file is returned to them
- Enter a closing summary in the person's HMIS file within two days of discharge.

Closing Summary

A closing summary entered into the person's record must be documented in HMIS by staff within two days of departure. The closing summary should include:

- The reason for discharge
- Service goals and outcomes
- Plans for follow-up
- Other summary comments as appropriate.

Confidentiality and Privacy

Subrecipients must incorporate into their policies and procedures a process that will ensure the confidentiality of program participants' identifying information; records pertaining to any individual or family provided family violence prevention; and treatment services offered under any project assisted with ESG funds. Furthermore, the address or location of any shelter for victims of domestic violence assisted under ESG will be anonymous except upon written authorization from the person or persons responsible for the operation of the shelter for this information to be made public.

Intake Procedures for Emergency Shelters

Hours of Operation

All Emergency shelters will operate 7 days a week and clearly state and/or display hours of operation. Shelter intake hours and supportive services hours will be clearly defined and advertised to avoid client confusion and disorientation.

Shelters not operating on a 24-hour basis will create and implement a policy for extension of their operating hours during inclement weather and during designated emergency situations including, but not limited to:

- Severe weather (see Appendix VI)
- Natural disasters
- Other such situations as designated by governmental authorities

Shelter beds will be held for a period of one night of a person's absence from the shelter. Flexibility with clients given certain circumstances requires pre-approval. All shelters should have a clear process for holding beds in the case of extenuating circumstances.

Intake Procedures

Intake procedures on persons presenting in housing crisis must be administered consistently and equally, regardless of disability or other personal characteristics. See Documenting Homelessness for rules and procedures.

All shelters should inform clients about shelter rules in writing. Clients should be requested to sign off that they received these rules.

During the intake process, emergency shelter providers must refrain from asking questions about disabilities and other protected information until it has been made clear to the client(s) that they have been admitted into the program.

After the initial intake process is complete, staff should inform each client that answering the HMIS questions is voluntary, and that any information gathered is for HMIS purposes only. Staff should clarify that answering the HMIS questions and will not affect the client's ability to stay in the shelter or access services provided through the program.

Lack of adequate staffing to complete an intake is not an appropriate condition for refusal to accept a referral of client presenting for shelter. In such cases, providers should collect as much information as practical and complete the full assessment as soon as possible.

After an applicant has been approved for admittance into a shelter or service, it is permissible to ask the person about disability and other health-related issues ONLY if it pertains to program eligibility or as part of a reasonable accommodation request. It is a good practice to have the post-acceptance questioning regarding disability and other supportive service needs conducted by a supportive services staff member instead of a housing management staff member.

The City of Detroit expects that all funded emergency shelters work to create a welcoming environment for persons entering in housing crisis. Such environments may include (but are not limited to):

- Welcoming persons as they enter the shelter
- Introducing staff when first meeting persons in housing crisis
- Making the first move to engage persons in need. (Don't wait for people to come to you for help.)
- Ensure that all discussions that include personal information or business are conducted in as private of a space as possible.
- Maintain a clean and orderly environment.

Reminder: All emergency shelters receiving HUD funding are required by federal law to adhere to HUD's [Equal Access Rule](#). The Equal Access Rule provides protection for any person or family seeking emergency shelter and removed barriers to access based on gender identity and family composition. No exceptions will be made to the requirements under the law. The City of Detroit stands firmly that all persons requesting shelter and utilizing shelter services are treated with the utmost respect and dignity. Discrimination of any kind will not be tolerated within the Detroit Homeless Service System. Refer to the definitions section in the earlier part of this Manual for additional guidance.

Special Population Considerations

Recommending persons in housing crisis to other programs because they have a disability is called steering and it is illegal discrimination. While all persons in housing crisis should have access to the full range of homeless system services, there are specific populations that may require special attention.

Violence Against Women Act

Per the VAWA, [24 CFR 5.2005](#), an applicant for assistance or tenant assisted under a covered housing program may not be denied admission to, denied assistance under, terminated from participation in, or evicted from the housing on the basis or as a direct result of the fact that the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if the applicant or tenant otherwise qualifies for admission, assistance, participation, or occupancy.

All emergency shelters must accept clients that are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

Community Standards

The City of Detroit's Homelessness Solutions (HS) team, with the support of the Michigan Department of Health and Human Services (MDHHS) Emergency Shelter Program (ESP), partners is committed to improving our homeless system by ensuring it is designed to benefit and help individuals and families in need. To accomplish this, the HS team has worked alongside the shelter providers within our community in 2023 and 2024 to develop community standards.

These standards were developed in an effort to reduce barriers and overly restrictive rules, while still maintaining structure, and allow clients to receive the most supportive and consistent services possible. These community standards will also help to create a more consistent and standardized approach from all shelters in our CoC.

Providers are required to train all staff of the Community Standards expectations. Training provided by the City of Detroit can be found [here](#). These standards are subject to change throughout time as necessary to continue to improve services. See Appendix IX for the list of Community Standards

Client Files and Record Keeping

Every client who has received a direct service from an ESG subrecipient must have a client file that documents the reason(s) for the assistance. Each file must include the documentation in the list below.

Required File Documentation

- A VI-SPDAT assessment by Coordinated Assessment Model staff (In HMIS)
- Signed HMIS Release of Information (ROI) (for all members of the household)
- Verifications of Homelessness or At Risk of Homelessness that align to the project with which they are involved (third party certification or self-declaration, plus backup documentation) or proof of self-certification of homelessness sign-in sheet and process
- Initial Intake Form
- If the shelter has identified the resident as chronically homeless in HMIS they should notify CAM
- Housing focused Case Notes (minimum of monthly case notes)
- Individualized Housing and Service Plan (see Appendix IX)

- As applicable, determinations of ineligibility (e.g., if client requests services and is deemed ineligible or declines services, written explanation of why the client was ineligible or declined services, along with any rights of appeal they may have)
- State issued identification (or HMIS ID if state issued ID is not available)
- Proof of referral from or to CAM

All information required above must be completed in HMIS unless an organization receives a waiver from the City of Detroit prior to contract start.

Other Emergency Shelter Documentation

Documentation of compliance with the applicable requirements for providing service and assistance ([24 CFR 576.102](#)) includes:

- Case Management Documentation: Assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant. The following must be documented:
 - Initial evaluation
 - Eligibility
 - Counseling
 - Program participant progress
 - Information and referrals to other providers
 - Ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking
- Child Care Documentation: Childcare provided for program participants
 - Meals and snacks provided
 - Appropriate developmental activities provided
 - Verification that the childcare center is licensed
- Education Series Documentation: Document the costs of improving knowledge and basic educational skills
 - Instruction or training in consumer education
 - Instruction or training in health education
 - Substance use prevention instruction or training
 - Instruction or training in literacy
 - English as a second language instruction or training
 - General Education Development (GED) instruction or training
 - Component services or activities such as: screening, assessment, and testing; individual or group instruction; tutoring; provision of books, supplies and instructional material; counseling; and referral to community resources.
 - Employment Assistance and Job Training Documentation
 - Employment assistance and job training programs, including classroom, online, and/or computer instruction; on-the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential.
 - Stipends provided to program participants in employment assistance and job training programs.

- Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.
- Services that assist individuals in securing employment include employment screening, assessment, or testing; structured job skills and job seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; and counseling or job coaching.
- Referrals to community resources.
- Outpatient Health Services Documentation: Documents direct outpatient treatment of medical conditions provided by licensed medical professionals.
- Legal Services Documentation
 - Legal advice provided
 - Verification that attorney is licensed and in good standing with the bar association
 - Matters that interfere with the program participant's ability to obtain and retain housing. Eligible subject matters are child support, guardianship, paternity, emancipation, and legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking, appeal of veterans and public benefit claim denials, and the resolution of outstanding criminal warrants.
- Life skills training documentation: Documents life skills training necessary to assist the program participant to function independently in the community (e.g., budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting).
- Mental health services Documentation: Documents direct outpatient treatment by licensed professionals of mental health conditions.
- Substance use treatment services documentation:
 - Substance use treatment services designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors
 - Verification that treatment providers are licensed or certified professionals
 - Duration of outpatient treatment (up to 30 days)
 - Group and individual counseling sessions
 - Drug testing.
- Transportation Documentation:
 - Transportation of a program participant to and from medical care, employment, childcare, or other eligible essential services facilities
 - Program participant's travel on public transportation

Eligibility Documentation

- All persons served by Emergency Shelter Program services must meet either Category 1 or Category 4 of HUD's definitions of homelessness as defined in [24 CFR 577](#) at time of acceptance into an emergency shelter program. Refer to the glossary of terms in the beginning of this document for additional guidance on the definitions.
- There is no income limitation for entry into Emergency Shelter.
- While shelters may ask for identification for all members of the households, inability to produce this documentation is **NOT** a barrier for entry or reason for denial.

Documenting Homeless Status

Recipients and subrecipients operating emergency shelters can document homeless status through a certification by the individual or head of household as the primary method of establishing homeless eligibility. In these instances, one method of meeting this standard would be to require households to complete a sign-in sheet, with a statement at the top informing the individual or head of household that by signing, they certify that they are homeless. *Note: Under no circumstances must the lack of third-party documentation prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to receive shelter or services provided by a victim service provider.*

Shelters **cannot** require the following documentation as a condition of admission: (list include but not limited to.)

- Proof of citizenship
- Marriage Certificates
- Medical and Mental Health diagnosis and medication compliance
- Vital documents such as ID, birth certificate, or social security cards

Category 1: Literally Homeless Clients

For applicants who lack a fixed, regular, and adequate nighttime residence, meaning nightly residence may be in: car; park; abandoned building; bus or train station; airport; camping ground; or hotel and motels paid for by charitable organizations or federal, state or local government programs. For these applicants, any of the following forms of documentation may be used:

- Written observation by the outreach worker
- Written referral by another housing or service provider
- Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter

For an individual who is exiting an institution where he/she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution, any of the following forms of documentation may be used:

- Written observation by the outreach worker
- Written referral by another housing or service provider
- Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter **AND**
- Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution. All oral statements must be recorded by the intake worker, or
- Written record of intake worker's due diligence in attempting to obtain the evidence described above and certification by the applicant that states he/she is exiting or has just exited an institution where he/she resided for 90 days or less.

Category 4: Fleeing/Attempting to Flee Domestic Violence Clients

For Victim Service Providers:

- An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

For Non-Victim Service Providers:

- An oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the care worker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified.
- Certification by the individual or head of household that no subsequent residence has been identified
- Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Section 8: Rapid Rehousing



Overview

Rapid Rehousing programs are designed to help those who are experiencing homelessness transition into permanent housing. The primary goal is to stabilize a program participant in permanent housing as quickly as possible and to provide wrap-around services after the family or individual obtains housing. Once a participant is enrolled, Rapid Rehousing programs should rely heavily on a case management plan to ensure long term stability for program participants. Providers are expected to implement a case management plan that will increase household incomes and/or increase access to mainstream benefits for program participants.

Linkages should also be made to applicable mainstream programs such as SOAR, food stamps, TANF, and other programs as applicable. In most cases, households who have entered a Rapid Rehousing program have applied for a Housing Choice Voucher through the Michigan State Housing Development Authority. While voucher availability is never a guarantee, ensuring the tenant obtains their vouchers when available is of tantamount importance both for that tenant's long-term self-sufficiency and for those in shelter who would benefit from Rapid Rehousing. This is a key part of the case management.

Priorities

Rapid Rehousing projects must demonstrate the following priorities:

- A staffing structure designed specifically to support households experiencing homelessness (maximum case management ratio of 1:25);
- High-quality, tenant-centered housing search resources and experience;
- Demonstrated progressive engagement model;
- Strong housing-focused case management that is client-centered and trauma-informed;
- Demonstrated success in connecting clients to mainstream benefits, such as income / employment and health;
- Demonstrated success in exits to permanent housing;
- A direct connection to workforce development; and
- Flexible, participant-driven, and strengths-based service delivery.

Program Components

Rapid Rehousing program design must support the Detroit CoC's commitment to end homelessness through the provision of low-barrier and Housing First approaches that quickly connect individuals and families experiencing homelessness to safe, affordable, and sustainable housing opportunities complemented by ongoing services that are designed to stabilize households and to prevent future returns to homelessness. Additionally, project design must address the unique needs of high-risk populations including older adults, racial and ethnic minorities, people with medical conditions, and people with disabilities. Please see [this resource](#) describing the core components of RRH.

The City funds two different RRH program types.

- **Standard RRH:** provision of housing search and responsive, person-centered financial assistance including housing startup costs, arrears payments, security deposits, rental assistance, and housing stabilization services designed to provide each household referred with what it needs to exit homelessness and become stable in permanent housing.
- **Sheltered Housing Placement:** provide primarily housing search case management so that households quickly move out of emergency shelter. Financial assistance should be offered using a progressive engagement model and therefore only provided as needed to stabilize households in permanent housing.

Eligibility and Target Population

All RRH programs must serve individuals and families experiencing homelessness, as defined by categories 1 and 4 of the [Homeless Definition Final Rule](#). Rapid Rehousing programs must serve only clients referred by the coordinated entry lead agency. It is important to note that not all households who qualify for Rapid Rehousing assistance will receive it and that prioritization criteria have been established by the community to prioritize limited resources. Agencies must take care to ensure proper documentation is obtained and stored with agency and client files. **All eligible clients must be served without any additional participation requirements, targeting, or entry criteria.**

Eligible Activities

Rental Assistance

Rental Assistance funds will be used to provide rental assistance to support persons moving from a homeless situation into permanent, stable housing as indicated below. The subrecipient may provide program participants with up to 24 months of rental assistance during any 3-year period, including any combination of.

- Short-term rental assistance – up to 3 months of rent
- Medium-term rental assistance – 4 to 24 months of rent
- Payment of rental arrears, which consists of a one-time payment for up to 6 months of arrears, including any late fees.

NOTE: Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance or living in a housing unit receiving project-based rental assistance or operating assistance through other public sources (such as Housing Choice Voucher/Section 8 or other public housing).

Housing Relocation and Stabilization Services

Funds will be used to support case management staff who will work with persons and/or households who are homeless to ensure long-term housing stability during the program and after the rental assistance term ends. Notwithstanding Housing First expectations, RRH projects are required to meet with project

participants at least once monthly to help ensure long-term housing stability for the participant. Such services include providing participants with the necessary assessment and services to assist them with locating, moving into, and maintaining permanent housing, as well as developing a plan to assist the program participant to retain permanent housing after the ESG assistance ends. These funds may also be used to provide direct financial assistance to assist households who are experiencing homelessness with moving into housing as described below:

Financial Assistance	Stabilization Services	Other Eligible Costs
<ul style="list-style-type: none"> • Rental application fees • Security deposit • Last month’s rent • Moving costs • Utility deposits • Utility payments 	<ul style="list-style-type: none"> • Housing search and placement • Housing stability case management • Mediation • Legal services • Credit repair 	<ul style="list-style-type: none"> • Staff and facility costs

Financial Assistance

ESG funds may be used to pay housing owners, utility companies, and other third parties for the costs described below. Note that this does not include any direct payments to the applicants/resident.

Rental Application Fees

ESG funds may pay for the rental housing application fee if it is a standardized fee charged to all applicants, not just those in an ESG program

Security Deposits

ESG funds may pay for a security deposit that is equal to no more than 1.5 months of rent.

Last Month’s Rent

If necessary to obtain housing for a program participant, then the last month’s rent may be paid from ESG funds to the owner of that housing at the time the owner is paid the security deposit and the first month’s rent. This assistance must not exceed one month’s rent and must be included in calculating the program participant’s total rental assistance (which cannot exceed 24 months during any 3-year period per ESG regulations).

Moving Costs

ESG funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance under housing stabilization services and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.

Utility Deposits

ESG funds may pay for a standard utility deposit required by the utility company including the following utilities:

1. Gas
2. Electric
3. Water
4. Sewage

Utility Payments

ESG funds may pay for up to 24 months of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service. A partial payment of a utility bill counts as one month. This assistance may only be provided if the program participant or a member of the same household has an account in their name with a utility company or proof of responsibility to make utility payments. Eligible utility services are gas, electric, water, and sewage.

Stabilization Services

ESG funds may be used to provide specific supportive services to eligible households. These services may be provided with or without the provision of financial or rental assistance, for a maximum of 24 months.

ESG funds may be used to provide the following categories of stabilization services:

Housing Search and Placement

For participants who need assistance finding or securing housing, ESG funds may support the services or activities necessary to assist them in locating, obtaining, and retaining suitable permanent housing. These activities include:

1. Assessment of housing barriers, needs, and preferences
2. Development of an action plan for locating housing
3. Housing search
4. Outreach to and negotiation with owners
5. Assistance with submitting rental applications and understanding leases
6. Assessment of housing for compliance with ESG requirements for habitability, lead- based paint, and rent reasonableness/FMR as described above
7. Assistance with obtaining utilities and making moving arrangements
8. Tenant counseling.

Housing Stability Case Management

ESG funds may be used to pay the costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing. Funds may also be used to assist a program participant in overcoming immediate barriers to obtaining housing.

This assistance cannot exceed 30 days during the period that the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing per the regulations.

Whether paid for with ESG funds or not, housing stability case management should be provided as needed to support households to regain housing stability and link them to other services in the community. The program must, at minimum, develop a plan to assist the program participant to retain permanent housing after the ESG assistance ends. The plan should take into account all relevant considerations, including: the program participant's current or expected income and expenses; other public or private assistance for which the program participant will be eligible and likely to receive; and the relative affordability of available housing in the area.

Case management services are intended to be flexible and respond to the participant's needs, while leveraging other services in the community as much as possible. During their enrollment in the program, participants must meet with a case manager not less than once per month to work towards long-term housing stability.

Mediation

ESG funds may pay for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the participant from losing permanent housing in which they currently reside.

Legal Services

Component services or activities may include client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling.

1. **Eligible Subject Matters:** These include child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; and the resolution of outstanding criminal warrants.
2. **Eligible Costs:** Eligible costs are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of the State in which the services are provided, and by person(s) under the supervision of the licensed attorney, regarding matters that interfere with the program participant's ability to obtain and retain housing. Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the program's employees' salaries and other costs necessary to perform the services.

Legal services for immigration, citizenship matters, and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are also ineligible costs.

Credit Repair

ESG funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.

Referrals

100% of all referrals to the City of Detroit’s Rapid Rehousing programs will be provided through Detroit’s Coordinated Assessment Model (CAM), per the City of Detroit’s [Rapid Rehousing Policies and Procedures](#).

Prioritization and Referral Process

Clients who are recommended for Rapid Rehousing are prioritized by Acuity Group (Acuity Group 2, then Acuity Group 3, etc.) and according to the following factors:

1. Clients who are chronically homeless
2. Clients who are unsheltered
3. Clients who are fleeing domestic violence
4. Clients with the highest VI-SPDAT score

When there are multiple clients with the same score after the above criteria are followed and not enough RRH resources available for all of them, clients will be prioritized in the following order:

1. Family status
 - a. Families
 - b. Singles Adults
2. Length of time homeless
 - a. Longest length of time homeless to shortest length of time

The prioritization factors are subject to change according to community need. Any changes to prioritization factors will be communicated by the Homeless Action Network of Detroit (HAND) and will be included in the Manual’s annual updates.

Referral to Rapid Rehousing Providers

Referrals are driven by program capacity. As soon as a provider is aware of an opening, they should request a referral from the CAM. Clients will be referred at a ratio of 1 applicant to 1 available Rapid Rehousing opening.

Once a referral is made, the Rapid Rehousing providers will follow the timeline in Figure 2.

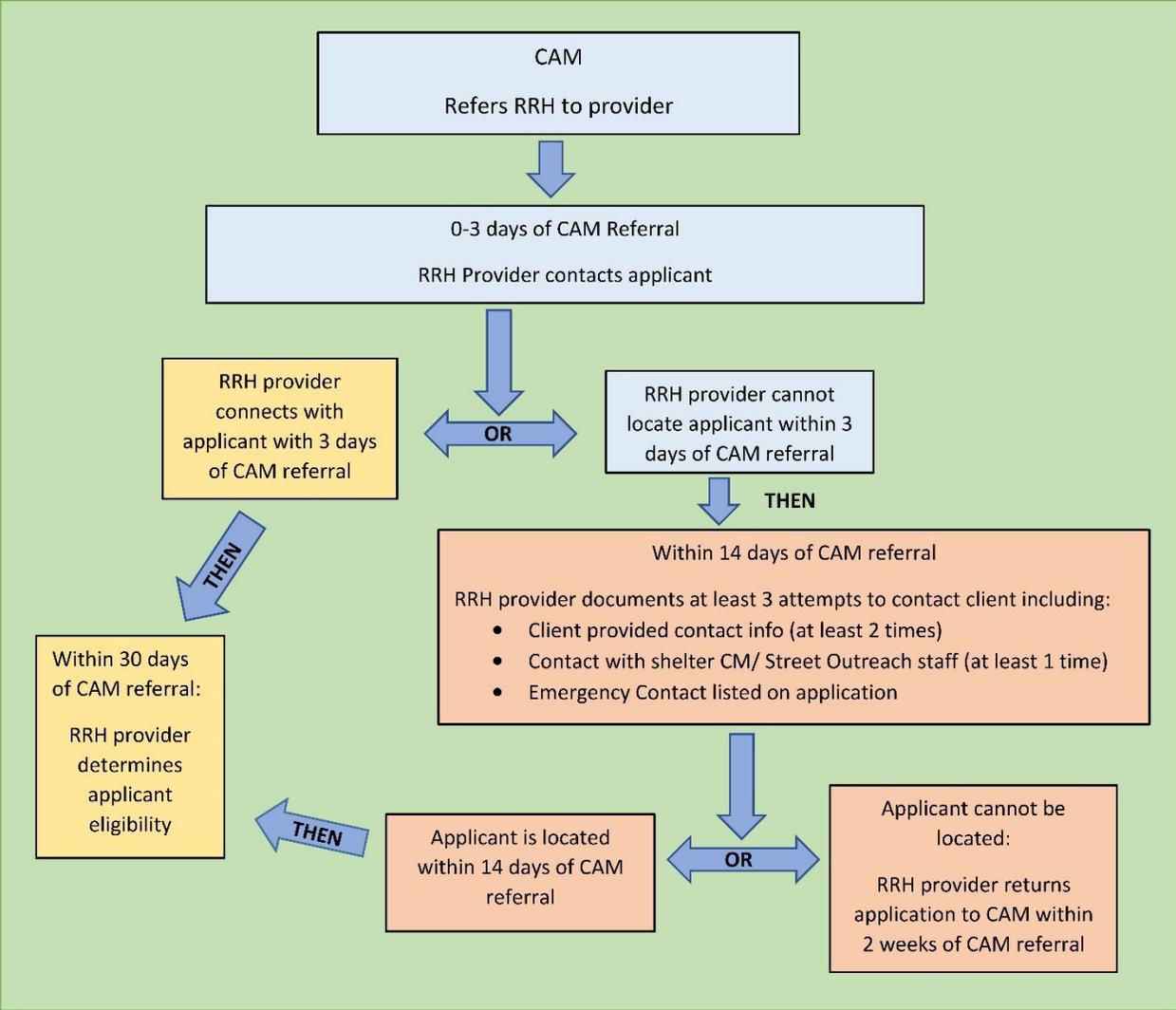


Figure 2: RRH Referral Timeline

Security Deposit Only Referrals

Participants seeking assistance with Security Deposit Only may be eligible for financial assistance without prioritization or waitlist placement. Applications for Security Deposit Only may be assisted at any time if program funds are available. **Rapid Rehousing providers should assess the financial status of Security Deposit Only referrals to determine if there is a demonstrated need for this assistance prior to providing the service.**

Given the limited diversion funding available in the community, and Rapid Rehousing provider expertise in assisting households in the lease-up process, Rapid Rehousing providers are required to assist in both “standard” Rapid Rehousing referrals (including ongoing financial assistance and case management, as needed) AND Security Deposit Only referrals (regardless of subsidy status).

Documentation of Eligibility

Clients can be referred via CAM regardless of whether they have all required documentation at time of referral. **The only required referral document for Rapid Rehousing is verification of homelessness, which should be uploaded into the client's HMIS record.** An open entry in a shelter program is sufficient documentation to verify the client's homelessness. If a household is being referred to a Rapid Rehousing program specifically funded to serve persons fleeing domestic violence, documentation of the person's fleeing/attempting to flee domestic violence must be obtained.

Upon first contact, the RRH provider will utilize HMIS data to verify client is still experiencing homelessness. If HMIS data is unavailable, client is to complete a self-statement of homelessness prior to eligibility determination.

Please note that lack of personal verification documentation shall not prevent entry into the Rapid Rehousing program. However, it is the expectation of the program providing services to secure third party verification of identity as soon as possible and should be in the client file at time of exit. Timeliness is important because if a client receives any subsidy, it is expected that a household have current identification and other personal verification documents.

The following documents should be collected or obtained when possible, to determine Rapid Rehousing program eligibility:

1. Photo identification for Head of Household and all household members age 18 and over. This can be a federal, state or municipally issued form of picture ID.
2. Birth Certificates for all children in household- Medicaid card can substitute
3. Social Security Cards

If any of the above documents are missing during housing search and placement process, case management should still move forward. Case managers should complete [Form 16: Missing Documentation Form](#). This form provides the opportunity for self- certification of identity. As soon as possible all missing documents are expected to be obtained with support from the case manager.

If eligible for Veteran Services, the CAM will refer the client to SSVF. If not eligible for Veteran Services, CAM will follow established prioritization for RRH.

Referral Refusals

The following guidance outlines the reasons that a referral can be refused by a Rapid Re- Housing service organization:

- If there is a conflict of interest between staff and a referral, every effort should be made to reassign the referral to a non- conflict staff person.
- An individual Rapid Rehousing program may refuse a program referral if the applicant was previously served by the Rapid Rehousing program and the program can demonstrate that the client was terminated for violation of health and safety of staff and/or community.

- If there are other extenuating circumstances, providers should reach out to their City of Detroit grant manager and/or HAND via email to request approval to refuse a referral.

Documenting Referrals in HMIS

Referral Outcome

After a RRH provider receives a referral from CAM in HMIS, the provider is required to document the outcome of the referral using one of the following options:

- **Accepted:** Client referral accepted (Intake appointment scheduled)
- **Declined:** Client referral declined due to ineligibility; client refusal reason for decline must be provided.
- **Cancelled:** Client was unable to be contacted/ No show for intake appointment (per contact parameters outlined in Figure 2 of this document)

Post Referral Workflow

Below are the expectations for documentation in HMIS after a referral has been requested from CAM:

- Run HMIS referral report for the current referral period
- Compare HMIS referral report to referral confirmation e-mail received from CAM
- If any discrepancies exist, contact CAM immediately to inform
- Attempt to contact client within 3 days upon receipt of referral, and document attempts to contact in the “Case Notes” section of the summary page
- At least 2 documented contacts to the contact info provided by client
- At least 1 documented contact to the shelter case manager/street outreach provider
- If applicable, at least 1 documented contact to any other contact listed for client in HMIS
- Once contact with client is made, schedule intake with client and complete the referral outcome as “accepted” in HMIS.
- If client unable to be contacted after the 3 documented attempts, complete the referral outcome as “cancelled” in HMIS. CAM will run a referral report to note any cancelled referrals, check for documented attempts at contact, and move client to inactive if attempts at contact have been sufficiently made.
- Upon intake with client, complete a Program Entry in your specific program bin. All clients with accepted referrals should have a Program Entry (noting intake has taken place) within 30 days of referral being made.
- If client is found to be ineligible or refuses services at the point of intake:
 - Complete the referral outcome as “declined” in HMIS
 - Complete an entry in the “RRH Outcomes/Client Status” sub-assessment on the summary page with the following information:
 - RRH Client Status: Client denied for RRH
 - If Denied-Reason: Select the reason for denial
- Once intake has been completed and client is enrolled in program, select “yes” next to “client currently in RRH program?” and complete an entry in the “RRH Outcomes/Client Status” sub-

assessment on the summary page with the appropriate information reflecting the status of the case.

- While working with client toward housing (after client enrolled in program):
- Document all case notes in the “Goals” section of HMIS under the “Case Plans” tab.
- Complete an entry in the “RRH Outcomes/Client Status” sub-assessment on the summary page once per month or as client status changes.

Supportive Services

The primary goal of Rapid Rehousing is to stabilize a program participant in permanent housing as quickly as possible and to provide wrap-around services after the family or individual obtains housing. Once a participant is enrolled, Rapid Rehousing programs should rely heavily on a case management plan to ensure long term stability for program participants. Rapid Rehousing Supportive Services should meet the following requirements:

- Providers should utilize progressive engagement to provide the fullest extent of services necessary to help participants reach identified goals. **Engagement in services is voluntary.** All attempted contacts should be documented in HMIS.
- Rapid Rehousing programs should not exceed a client household ratio of 1:25. Budgets should reflect appropriate staffing to match these case management ratios and ensure an adequate level of service for households being served in Rapid Rehousing.
- Rapid Rehousing programs require a visit – virtually or in-person - with Rapid Rehousing participants every 30 days and a home visit every 90 days. The initial housing plan should be drafted with participants at project entry. Housing plans should be updated within 30 days of moving into housing. If the Tenant is facing a threat of eviction, the agency should create a Landlord Mediation Plan/Stabilization plan to prevent eviction.
- Income certification should be done on an annual basis based on their date of program entry or if the client loses income.

The role of Rapid Rehousing staff in case management services is as follows:

- Be an active partner in housing search, providing the level of support necessary to help participant household obtain housing.
- Understand and help remove barriers to housing
- Work with participant to connect to mainstream resources and employment support
- Connect clients with subsidized housing as appropriate including housing choice and other voucher programs
- Recertify clients for housing choice vouchers, assist with completing briefing packets, identify other housing units if applicable, and lease up with voucher

Calculating Rental and Program Assistance Payments

Subrecipients are expected to adhere to the following rent payment and schedule guidance:

- Rapid Re-Housing providers should pay 100% of the first three month's rent regardless of household income (prorated rent counts as the first month's rent)
- Beginning month four-tenant pays 30% of adjusted income, through to the termination of Rapid Re-Housing programmatic rental assistance.
- Tenants will pay their portion of the rental amount directly to the property owner.

Leases and Rental Assistance Agreements

Each program participant receiving rental assistance through ESG must have a **legally binding, written lease** for the rental unit, unless the assistance is solely for rental arrears. The lease must be between the owner and the program participant. Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease if: 1) the agreement gives the program participant an enforceable leasehold interest under state law and the agreement, and 2) rent owed is sufficiently documented by the owner's financial records, rent ledgers, or canceled checks.

In addition, a **rental assistance agreement** is required between the subrecipient and the landlord. A subrecipient may make rental assistance payments only to an owner with whom the subrecipient has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements listed in this section. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the subrecipient a copy of any notice to the program participant to vacate the housing unit or any complaint used under state or local law to commence an eviction action against the program participant.

The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease. The landlord must agree to enter into the Rental Assistance Agreement every 90 days (upon client recertification).

The rental assistance agreement with the landlord must terminate and no further rental assistance payments under that agreement may be made if:

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

The subrecipient must make timely payments to each owner in accordance with the lease and rental assistance agreement. The subrecipient is solely responsible for paying late payment penalties that it incurs with non-ESG funds.

Fair Market Rent and Rent Reasonableness Requirements

Rental assistance cannot be provided for a housing unit unless the total rent for the unit does not exceed the fair market rent (FMR) established by HUD, as provided under [24 CFR 982.503](#). The total rent for the unit must also comply with HUD's standard of rent reasonableness, as established under [24 CFR 982.507](#).

These rent restrictions are intended to ensure that program participants can remain in their housing after their ESG assistance ends.

Rent reasonableness and FMR requirements do not apply when a program participant receives only financial assistance or services under Housing Stabilization and Relocation Services. This includes rental application fees, security deposits, an initial payment of last month's rent, utility payments/deposits, moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, legal services, and credit repair.

Note that this guidance only applies to the Homeless Prevention and Rapid Re-Housing components of ESG. For guidance on CoC rules regarding FMR and rent reasonableness, please consult the following [HUD Exchange resource](#).

Rent Reasonableness

The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units.

In many areas, the easiest way to determine rent reasonableness is to use a housing database search engine that will compare units and rents against one another. One option is [Michigan Housing Locator](#). Other local resources may also be used to obtain information, such as market surveys, classified ads, and information from real estate agents. When comparing rent reasonableness, the proposed unit must be compared to at least three other units.

Fair Market Rent (FMR)

FMRs are gross rent estimates. The U.S. Department of Housing and Urban Development (HUD) annually estimates FMRs for 530 metropolitan areas and 2,045 nonmetropolitan county areas. HUD sets FMRs to assure that a sufficient supply of rental housing is available to program participants. By law, HUD is required to publish new FMRs at the start of each federal fiscal year on October 1.

Fair Market Rents are updated by HUD every year and can be found online at: <http://www.huduser.org/portal/datasets/fmr.html>

Inspection and Lead-Based Paint Requirements

All RRH units must meet minimum habitability standards for inspection and lead-based paint. Locally, Rapid Re-Housing providers must also pass HSQ inspection**. See **Appendix IV** for information regarding inspection requirements and **Appendix V** or information regarding lead-based paint requirements.

****NOTE:** Providers will be required to move to NSPIRE requirements – which will replace HQS in October 2025.

Termination of Assistance

It is important that Rapid Re-Housing providers effectively communicate termination and grievance procedures to participants and ensure that the procedures are fully understood. Posting the policy on a bulletin board in a common area within the facility is an effective way to ensure that the termination and grievance procedures are available for participants to access at any time. Additionally, all City of Detroit funded Rapid Re-Housing program agencies must include termination policies and procedures in their agency regulations and manuals.

If a participant violates ESG program requirements, the subrecipient may terminate assistance in accordance with a formal process established by the subrecipient that recognizes the rights of individuals affected. The subrecipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.

To ensure effective communication for both Rapid Re-Housing agencies and participants, the Detroit CoC requires the following actions prior to program termination:

1. At least one face to face meeting with the Rapid Re-Housing participating household discussing program violations;
2. A written plan for rectifying program violations including action steps for both Rapid Re-Housing agency staff and program participants;
3. If termination is due to an inability to contact the client, the following must be documented in the file:
 - a. An attempted home visit; AND
 - b. A letter to client and landlord notifying the intent to terminate rental assistance

In any situation, case notes should demonstrate documented efforts made to contact and connect with client.

Termination under this section does not bar the recipient or subrecipient from providing further assistance at a later date to the same family or individual as long as that individual has not reached the maximum amount of assistance (24 months of assistance over a three- year period). Those seeking further assistance must be homeless and referred through the CAM system, as outlined in **Section 3** > Coordinated Entry Systems of this Policies and Procedures Manual.

CoC-funded Rapid Re-Housing programs should refer to [24 CFR § 578.91](#) for further guidance.

Performance Benchmarks

The City will require that Rapid Re-Housing providers track their performance on the following measures:

- Average length of time (days) to move households into housing from program entry;
- Percentage of households who exit to a permanent housing destination;
- Percentage of households that exit within 180 days of program entry*

*The City will continue to monitor both program and system level performance on this benchmark. The City will inform programs prior to the contract start date if they will be measured on this benchmark.

Client Files and Recordkeeping

Every client who has received a direct service from an ESG subrecipient must have a client file that documents the reason(s) for the assistance. Each file must include the documentation listed below.

Use of Standardized Rapid Re-Housing Forms

In order to ensure continuity across programs and providers, RRH providers receiving CoC or City of Detroit ESG funds are expected to use the program forms provided on [HAND's website](#). Although forms can be personalized to include the organization logo, the content should remain the same.

Client File Maintenance

Case Notes and Client Contact Requirements

All Rapid Re-Housing and Sustainability Coordination activities will be documented in case notes in the HMIS client case file. Case notes will include at minimum:

- Date, location, purpose of the activity;
- Progress on housing goals ;
- Documentation of appointments, meetings, home visits, phone calls, letters with members of the household, landlord and other service providers;
- For contacts with anyone other than a member of the household, a signed release of information must be included in the case file indicating consent for exchange of information;
- Referrals made, including date of referral, name of referral and reason for referral;
- Documentation of minimum monthly contact with the household;
- Indication that the housing service plan has been reviewed and updated a minimum of once per month; and
- Documentation of activities related to program exit.

Required Verifications

Rapid Re-Housing Coordinators are required to verify identity and income of program participants at the time of intake. Copies of the following verifications are to be included in the case file:

- To verify identify:
 - Proof of social security numbers and documentation of birth dates for all household members
 - Current Government issued photo identification card for all adult household members
 - Birth Certificates for children
- For income verification, any or all of the following as applicable:

- Most recent paystubs
- Employment verification (if unable to obtain paystubs)
- DHHS award letters for food stamps, MiBridges printout, or TANF
- SSI/SSDI
- Unemployment compensation
- Child support
- Other sources of income, W-, 1040

If at entry identity verification documents are not all available, a self-certification of identity must be included in the file. All identity documents should be placed in the file when obtained. **Reminder, lack of identification should never be a barrier to program entry.**

Required Releases of Information and Agreements

All client files must include the following:

- Housing Service Plan
- HMIS Client Consent (enter information into HMIS & share with agencies)
- Agency Client Release of Information
- Lease – once housed, a copy of the household’s signed lease will be included in the file
- Proof of rent reasonableness
- Notice of Occupancy Rights
- Duplication of Benefits form
- Lead notification (if applicable)

Documenting Income

Rapid Re-Housing Coordinators are required to verify income of program participants at the time of intake.

For FY2024, income limits for ESG (30% Income Limit) can be found on the [HUD Exchange](#) website (do not use HUD’s Extremely Low Income Limit; this is different than the 30% Income Limit). These income limits are updated annually (typically in the spring of each year) and take effect as soon as they are announced by HUD.

Subrecipients must calculate the annual income of the individual or family (as described in [24 CFR 5.609](#)). These regulations are summarized in the following charts.

When calculating income, subrecipients should note the following:

1. All adults (persons 18 and over) must have documentation of income (even if there is no income).
2. One or more of the below documents must be kept in the client/household file.
3. If there is more than one adult in a household, documentation must be provided for each adult household member.

4. If an adult has more than one income source or job, each source of income should have its own documentation (i.e., paystubs for employment & TANF benefit letter).

Please see Appendix III for income documentation options and exclusions.

Documenting Homelessness

Category 1: Literally Homeless Clients

For applicants who lack a fixed, regular, and adequate nighttime residence, meaning nightly residence may be in: car; park; abandoned building; bus or train station; airport; camping ground; or hotel and motels paid for by charitable organizations or federal, state or local government programs. Any of the following forms of documentation may be used, however the priority of types of documentation are as follows:

1. Written observation by the outreach worker
2. Written referral by another housing or service provider
3. Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter

For an individual who is exiting an institution where he/she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution, any of the following forms of documentation may be used:

1. Written observation by the outreach worker
2. Written referral by another housing or service provider
3. Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter **AND**
 - i. Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution. All oral statements must be recorded by the intake worker, **or**
 - ii. Written record of intake worker's due diligence in attempting to obtain the evidence described above and certification by the applicant that states he/she is exiting or has just exited an institution where he/she resided for 90 days or less.

Category 4: Fleeing/Attempting to Flee DV

For Victim Service Providers:

- An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

For Non-Victim Service Providers:

- An oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the care worker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified **AND**
- Certification by the individual or head of household that no subsequent residence has been identified **AND**
- Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Section 9: Homelessness Prevention



Overview

Homeless prevention services are most effectively implemented when targeted to those at the greatest risk of losing housing. Households should demonstrate that they do not have sufficient resources or support networks to prevent them from moving to an emergency shelter or other place defined under category 1 of the homeless definition.

Enrollment in a prevention program typically lasts less than 6 months, although enrollments can be longer. ESG subrecipients should negotiate with landlords as the first step in resolving eviction crises. Providers should focus on a case management plan to ensure long-term stability for program participants. Providers are expected to implement a case management plan that will increase household incomes and/or increase access to mainstream benefits for program participants (e.g., Medicaid SOAR, SNAPs, TANF).

The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing and achieve stability in that housing.

Priorities

Homelessness prevention programs must demonstrate the following priorities:

- High-quality, tenant-centered housing search resources and experience;
- Strong housing-focused case management that is client-centered and trauma-informed;
- Demonstrated success in connecting clients to mainstream benefits such as income/employment, education, training and health care;
- Demonstrate a progressive engagement model;
- Demonstrate success in exits to financially sustainable permanent housing;
- Landlord networks and demonstrated commitment to landlord engagement and recruitment;
- Direct connection to workforce development;
- Agencies that can work with clients that are doubled-up and can assist with relocation;
- Agencies must demonstrate the ability to perform all the core components of prevention: rental assistance and housing relocation and stabilization; and
- Flexible, participant-driven, and strengths-based service delivery.

Eligibility and Target Population

The Homelessness Prevention component provides eligible financial assistance and support services to prevent homelessness for qualified program participants as defined by Categories 2, 3 and 4 of the [Homeless Definition Final Rule](#), also found in Appendix I and have an annual income at or below 30% of area median income for the area as determined and defined by HUD. If a potential participant is in Category 4, they must not be sleeping in a place outlined in Category 1. Agencies must take care to ensure proper documentation is obtained and stored with agency and client files.

Homeless Prevention participants must have an annual income that is below 30% of the annual median family income for the area if being served with ESG.

Based upon assessed local need and identified local priority, the City will require that Homelessness Prevention providers:

- Serve all eligible clients without additional entry criteria or participation requirements;
- Be able to serve doubled-up households (non-leaseholders);
- Coordinate with mainstream services, including but not limited to Michigan Department of Health and Human Services (MDHHS) and the 36th District Court; and
- Conduct habitability inspections and lead compliance as required.

Referrals

Prevention providers serving both lease-holding and non-lease holding clients that are at immediate risk of homelessness can receive referrals through CAM unless otherwise requested by the City of Detroit. Eligible households contact CAM, receive a brief screening and prioritization assessment, and are then referred for services, dependent upon availability of resources. Please see Appendix XII to view the prevention prioritization assessment conducted by CAM. Providers are required to enter in a referral outcome in HMIS if receiving the referral from CAM.

Referral Outcome

After a prevention provider receives a referral from CAM in HMIS the provider is required to document the outcome of the referral using one of the following options:

- **Accepted:** Client referral accepted (Intake appointment scheduled)
- **Declined:** Client referral declined due to ineligibility, client refusal reason for decline must be provided.
- **Cancelled:** Acceptable reasons include:
 - Client was unable to be contacted for intake within 7 days using a variation of engagement tactics
 - No show for intake appointment (per contact parameter outlined in this document)

Eligible Activities

Rental Assistance

Rental Assistance funds will be used to provide short-term and medium-term rental assistance to support persons moving from a homeless situation into permanent, stable housing as indicated below:

- Short-term rental assistance – up to 3 months
 - Security Deposits

- Payment of rental arrears (one-time payment, up to 6 months) including any late fees on those arrears
- Medium-term rental assistance – 4 to 24 months
 - Security Deposits
 - Payment of rental arrears (one-time payment, up to 6 months) including any late fees on those arrears
 - Payment of rental arrears consists of a one-time payment for up to 6 months of arrears, including any late fees.

Except for a one-time payment of rental arrears and/or security deposits, rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance or living in a housing unit receiving project-based rental assistance or operating assistance through other public sources (such as Housing Choice Voucher/Section 8 or other public housing).

A program participant may not receive more than 24 months of rental assistance during any 3-year period. Limits on the assistance under this section apply to the total assistance an individual receives, either as an individual or as part of a family.

Housing Relocation and Stabilization Services

Funds will be used to support case management staff who will work with persons and/or households who are at imminent risk of homeless to ensure long-term housing stability during the program and after assistance ends. Notwithstanding Housing First expectations, prevention providers are required to make contact at least monthly to help ensure long-term housing stability for the participant. Such services include providing participants with the necessary assessment and services to assist them with locating, moving into, and maintaining permanent housing, as well as developing a plan to assist the program participant to retain permanent housing after the ESG assistance ends. These funds may also be used to provide direct financial assistance to assist households who are experiencing homelessness with moving into housing as described below:

Financial Assistance	Stabilization Services	Other Eligible Costs
<ul style="list-style-type: none"> ● Rental application fees ● Security deposit ● Last month’s rent ● Moving costs ● Utility deposits ● Utility payments 	<ul style="list-style-type: none"> ● Housing search and placement ● Housing stability case management ● Mediation ● Legal services ● Credit repair 	<ul style="list-style-type: none"> ● Staff and facility cost

Financial Assistance

ESG funds may be used to pay housing owners, utility companies, and other third parties for the costs listed below. Note that this does not include any direct payments to the applicants/resident.

Please note that in order to receive financial assistance, the program participant cannot be receiving the same type of assistance through any other public sources. In addition, participants are not eligible for financial assistance that are currently receiving housing payments under the Uniform Relocation Act (URA).

Rental Application Fees

ESG funds may pay for the rental housing application fee if it is a reasonable and standardized fee charged to all applicants, not just those in an ESG program.

Security Deposits

ESG funds may pay for a security deposit that is equal to no more than 1.5 months of rent.

Last Month's Rent

If necessary to obtain housing for a program participant, then the last month's rent may be paid from ESG funds to the owner of that housing at the time the owner is paid the security deposit and the first month's rent. This assistance must not exceed one month's rent and must be documented in the leasing agreement and included in calculating the program participant's total rental assistance (which cannot exceed 24 months during any 3-year period per ESG regulations).

Moving Costs

ESG funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance under housing stabilization services and before the program participant moves into permanent housing. Payment of temporary storage fees in the form of arrears is not eligible.

Utility Deposits

ESG funds may pay for a standard utility deposit required by the utility company including the following utilities:

1. Gas
2. Electric
3. Water
4. Sewage

Utility Payments

ESG funds may pay for up to 24 months of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service. A partial payment of a utility bill counts as one month. This assistance may only be provided if the program participant or a member of the same

household has an account in their name with a utility company or proof of responsibility to make utility payments. Eligible utility services are gas, electric, water, and sewage.

Stabilization Services

ESG funds may be used to provide specific supportive services to eligible households. These services may be provided with or without the provision of financial or rental assistance, for a maximum of 24 months.

ESG funds may be used to provide the following categories of stabilization services:

Housing Search and Placement

For participants who need assistance finding or securing housing, ESG funds may support the services or activities necessary to assist them in locating, obtaining, and retaining suitable permanent housing. These activities include:

1. Assessment of housing barriers, needs, and preferences
2. Development of an action plan for locating housing
3. Housing search
4. Outreach to and negotiation with owners
5. Assistance with submitting rental applications and understanding leases
6. Assessment of housing for compliance with ESG requirements for habitability, lead- based paint, and rent reasonableness/FMR as described above
7. Assistance with obtaining utilities and making moving arrangements
8. Tenant counseling.

Housing Stability Case Management

ESG funds may be used to pay the costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing. Funds may also be used to assist a program participant in overcoming immediate barriers to obtaining housing.

Case management assistance cannot exceed 30 days during the period that the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing per the regulations.

Whether paid for with ESG funds or not, housing stability case management should be provided as needed to support households to regain housing stability and link them to other services in the community. The program must, at minimum, develop a plan to assist the program participant to retain permanent housing after the ESG assistance ends. The plan should take into account all relevant considerations, including: the program participant's current or expected income and expenses; other public or private assistance for which the program participant will be eligible and likely to receive; and the relative affordability of available housing in the area.

Case management services are intended to be flexible and respond to the participant's needs, while leveraging other services in the community as much as possible. During their enrollment in the program,

participants must meet with a case manager not less than once per month to work towards long-term housing stability.

Case managers are required to meet with prevention participants at least once per month.

Mediation

ESG funds may pay for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the participant from losing permanent housing in which they currently reside.

Legal Services

Component services or activities may include client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling.

1. **Eligible Subject Matters:** These include child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; and the resolution of outstanding criminal warrants.
2. **Eligible Costs:** Eligible costs are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of the State in which the services are provided, and by person(s) under the supervision of the licensed attorney, regarding matters that interfere with the program participant's ability to obtain and retain housing. Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the program's employees' salaries and other costs necessary to perform the services.

Legal services for immigration, citizenship matters, and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are also ineligible costs.

Credit Repair

ESG funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.

HMIS

ESG funds may be used to pay the costs of contributing data to the HMIS designated by the CoC for the area, including the costs of:

- Purchasing or leasing computer hardware;
- Purchasing software or software licenses;
- Purchasing or leasing equipment, including telephones, fax machines, and furniture;

- Obtaining technical support;
- Leasing office space;
- Paying charges for electricity, gas, water, phone service, and high speed data transmission necessary to operate or contribute data to the HMIS;
- Paying salaries for operating HMIS, including:
 - Completing data entry;
 - Monitoring and reviewing data quality;
 - Completing data analysis;
 - Reporting to the HMIS Lead;
 - Training staff on using the HMIS or comparable database; and
 - Implementing and complying with HMIS requirements;
- Paying costs of staff travel to and attend HUD-sponsored and HUD-approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act;
- Paying staff travel costs to conduct intake; and
- Paying participation feeds charged by the HMIS Lead, if the recipient or subrecipient is not the HMIS Lead. The HMIS Lead is the entity designated by the CoC to operate the area's HMIS.

Evaluation of Program Participant Eligibility and Needs

Initial Evaluation

In accordance with [24 CFR 576.401](#), the subrecipient must conduct an initial evaluation to determine the eligibility of each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing. An initial evaluation must include documentation homeless status, verification that the household income does not exceed 30% AMI as stabilized by HUD, and determine that the household lacked sufficient resources and support networks necessary to retain housing without ESG assistance.

For each individual and family determined ineligible to receive ESG assistance, the record must include documentation of the reason for that determination.

Re-evaluation

The subrecipient must re-evaluate the program participant's eligibility and the types and amounts of assistance the program participant needs not less than once every 3 months for program participants receiving homelessness prevention assistance. At a minimum, each re-evaluation of eligibility must establish that:

- i. The program participant does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD; and
- ii. The program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance.

The subrecipient may require each program participant receiving homelessness prevention to notify the subrecipient regarding changes in the program participant's income or other circumstances (*e.g.*, changes in household composition) that affect the program participant's need for assistance under ESG. When notified of a relevant change, the recipient or subrecipient must re-evaluate the program participant's eligibility and the amount and types of assistance the program participant needs.

Rental Assistance

Subrecipients should use progressive engagement to provide the fullest extent of services necessary to help participants reach identified goals and retain permanent housing after the ESG assistance ends. While prevention participants can be provided up to 24 months of rental assistance during any 3-year period, subrecipients should provide ***the minimum assistance necessary for the shortest time possible***. Case Managers should work closely with participants to determine their ongoing needs throughout their time in the program, and not less than one every 3 months. Subrecipients should have an internal tracking mechanism for monitoring length of time for participants in the program.

Housing Stability Case Management

ESG funds may be used to pay the cost of assessing, arranging, coordinating and monitoring the delivery of individualized housing stabilization services to a program participant already in permanent housing (not to exceed 24 months) or to assist a program participant to overcome immediate barriers to obtaining housing (not to exceed 30 days). Subrecipients should utilize progressive engagement to provide the fullest extent of services necessary to help participants reach identified goals. Subrecipients should have an internal tracking mechanism for monitoring length of time for participants in the program.

Termination of Assistance

If the subrecipient terminates any participants from the program, it must be done so in accordance with a formal process established by the subrecipient that recognizes the rights of individuals affected, that met the following requirements:

- Written notice to the program participant containing a clear statement of the reasons for termination,
- A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate) who made or approved the termination decision, and
- Prompt written notice of the final decision to the program participant

The subrecipient must examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases. This must be outlined in the subrecipient's policies and procedures.

Client Files

General Program Documentation

Every client who has received a direct service from an ESG subrecipient must have a client file that documents the reason(s) for the assistance. Each file must include the documentation listed below.

All Client Files

- An assessment by either project staff or Coordinated Assessment Model staff
- Signed HMIS Release(s) (for all adult members of the household)
- Verifications of At Risk of Homelessness that align to the project with which they are involved (third party certification or self-declaration, plus backup documentation)
- Initial Consultation Form
- Case Notes (minimum of monthly case notes)
- Individualized Housing and Service Plan
 - Must include plan for participant to retain permanent housing after assistance ends, taking into account all relevant considerations, such as the program participant's current or expected income and expenses, other public or private assistance for which the program participant will be eligible and likely to receive, and the relative affordability of available housing in the area
- Income Verification including backup documentation (paystubs, third-party verifications, self-declaration of zero income etc.)
- As applicable, determinations of ineligibility (e.g., if client requests ESG services and is deemed ineligible or declines services, written explanation of why the client was ineligible or declined services, along with any rights of appeal they may have).

Homelessness Prevention Specific Forms

- Lead compliance documentation- this form is required for all clients, even if provided with legal services only, regardless if the client stays or moves into a different unit
- Current unit Inspection Report (Habitability)- this form is required for all clients, even if provided with legal services only, regardless if the client stays or moves into a different unit
- Signed lease containing client's name(s)
- Rent agreement (with landlord)
- Rent reasonableness/FMR documentation
- Documentation of services and assistance provided to the client, including, as applicable, the security deposit, rental assistance, and utility payments made on behalf of the client
 - Housing stability case management services must be document at least once per month
- Copies of financial assistance payments (including type of assistance, payee name, client name, check number, and amount paid using ESG funds)
- Staff certification of eligibility
- Duplication of Benefits form

Documenting Homelessness

Subrecipients are required to verify and document homelessness at time of program entry.

Category 2: Imminent Risk of Homelessness Clients

Verification of at-risk of homelessness status, which may include:

- A court order resulting from an eviction action notifying the individual or family that they must leave their residence within 14 days after the date of their application for homeless assistance; or the equivalent notice under applicable state law; or a Notice to Quit, or a Notice to Terminate issued under state law.
- For individuals and families whose primary nighttime residence is a hotel or motel room not paid for by charitable organizations or federal, state, or local government programs for low-income individuals, evidence that the individual or family lacks the resources necessary to reside there for more than 14 days after the date of application for homeless assistance.
- An oral statement by the individual or head of household that the owner or renter of the housing in which they currently reside will not allow them to stay for more than 14 days after the date of application for homeless assistance.
- The intake worker must record the statement and certify that it was found credible. To be found credible, the oral statement must either:
 - Be verified by the owner or renter of the housing in which the individual or family resides at the time of application for homeless assistance and documented by a written certification by the owner or renter or by the intake worker's recording of the owner or renter's oral statement; or
 - Be documented by a written certification by the intake worker of his/her due diligence in attempting to obtain the owner or renter's verification and the written certification by the individual or head of household seeking assistance that his/her statement was true and complete **and**
 - Certification that no subsequent residence has been identified **and**
 - Self-certification or other written documentation that the individual lacks the financial resources and support necessary to reside there for more than 14 days after the date of application for homeless prevention

Category 4: Fleeing/Attempting to Flee Domestic Violence Clients

For Victim Service Providers:

- An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement **must** be documented by a self-certification or a certification by the intake worker.

For Non-Victim Service Providers:

- An oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the care worker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified.
- Certification by the individual or head of household that no subsequent residence has been identified
- Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Note: If a potential participant is in Category 4, they must not be sleeping in a place outlined in Category 1 (literally homeless, living in an emergency shelter or place not meant for human habitation).

Documenting Income

Where the program participant qualified as at-risk of homelessness under paragraph (1) of the definition, the records should reflect that the household's income is below 30 percent of the area median income as evidenced by an income evaluation form containing HUD's minimum requirements and at least one of the following:

- Source documents for the assets held by the program participant and source documents of the income received over the most recent period for which representative data is available before the date of intake.
- Written statement by the relevant third party (e.g., employer) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party of the income of the program participant received over the most recent period for which representative data are available.
- Written certification by the program participant of the amount of income the program participant received for the most recent period representative of the income that the program participant is reasonably expected to receive over the 3- month period following the evaluation.
- Where the program participant qualified as at-risk of homelessness under paragraph (1) of the definition, do the records reflect the program participant's written certification that the program participant has insufficient financial resources and support networks immediately available to attain housing stability and meets one or more of the conditions under paragraph [\(1\)\(iii\) of the "at risk of homelessness" definition](#)?
- Where the program participant qualified as at-risk of homelessness under paragraph (1) of the definition, do the records show reasonable efforts to verify that the program participant did not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the homeless definition, as evidenced by one of the following:
 - Source documents (e.g., notice of termination from employment, bank statement, or health care bill showing arrears)
 - A written verification by the relevant third party or written certification by the recipient's/subrecipient's intake staff of the oral verification by the relevant third party; or

- A written statement by the recipient's/subrecipient's intake staff of the efforts taken to obtain verification through source documents and relevant third parties
- Where the program participant qualified as at-risk of homelessness under paragraph (1) of the definition, do the records show reasonable efforts to verify that the program participant met one of the seven conditions under paragraph (1)(iii), as evidenced by one of the following:
 - Source documents that evidence one or more of the conditions.
 - A written statement by the relevant third party or the written certification by the recipient's/subrecipient's intake staff of the oral verification by the relevant third party that the applicant meets one or more of the conditions
 - A written statement by the recipient's or subrecipient's intake staff that the staff person has visited the applicant's residence and determined that the applicant meets one or more of the conditions. If a visit is not feasible or relevant to the determination, a written statement by the recipient's/subrecipient's staff describing the efforts taken to obtain the required evidence.

NOTE: The conditions are: (1) has moved because of economic reasons two or more times during the 60 days immediately preceding the application for assistance; (2) is living in the home of another because of economic hardship; (3) has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of the application for assistance; (4) lives in a hotel or motel and the cost is not paid by charitable organizations, federal, state, or local government programs for low-income individuals; (5) lives in an SRO or efficiency apartment in which there resides more than two persons, or lives in a larger housing unit in which there resides more than 1.5 persons per room, as defined by the U.S. Census Bureau; (6) is exiting a publicly-funded institution, or system of care, or (7) otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness as identified in the ESG recipient's Consolidated Plan.

- Where the program participant qualified as at-risk of homelessness under paragraph (2), do the records reflect that the program participant met the definition of homeless under one of the following Federal statutes, as evidenced by a certification of the child's or youth's homeless status by the agency or organization responsible for administering assistance under the statute:
 - Runaway and Homeless Youth Act
 - Head Start Act
 - Subtitle N of the Violence Against Women Act of 1994
 - Section 330 of the Public Health Service Act
 - The Food and Nutrition Act of 2008
 - Section 17 of the Child Nutrition Act of 1966
- Where the program participant qualified as at-risk of homelessness under paragraph (3), the records should reflect that the child or youth in the household qualified as homeless under subtitle B of title VII of the McKinney- Vento Homeless Assistance Act, as evidenced by certification of the child or youth's homeless status from an agency or organization that administers assistance under the Education for Homeless Children and Youth Program. **NOTE:** Under this paragraph of At-Risk of Homelessness the certification need only specify that the child meets the definition under subtitle B of title VII of the McKinney-Vento Homeless Assistance Act.

Income Documentation at Intake

Prevention programs are required to verify income of program participants at the time of intake.

Income limits for ESG (30% Income Limit) can be found on the [HUD Exchange](#) website (do not use HUD's Extremely Low Income Limit; this is different than the 30% Income Limit). These income limits are updated annually (typically in the spring of each year) and take effect as soon as they are announced by HUD.

Subrecipients must calculate the annual income of the individual or family (as described in [24 CFR 5.609](#)). These regulations are summarized in the following charts.

When calculating income, subrecipients should note the following:

1. All adults (persons 18 and over) must have documentation of income (even if there is no income).
2. One or more of the below documents must be kept in the client/household file.
3. If there is more than one adult in a household, documentation must be provided for each adult household member.
4. If an adult has more than one income source or job, each source of income should have its own documentation (i.e., paystubs for employment & TANF benefit letter).

Please see Appendix III for income documentation options and exclusions.

Calculating Rental and Program Assistance Payments

Subrecipients are expected to adhere to the following rent payment and schedule guidance:

- Termination of Prevention programmatic rental assistance.
- Tenants will pay their portion of the rental amount directly to the property owner.

Subsidy Layering

Combining ESG Financial or Rental Assistance with Other Subsidies (§ 576.105(d) and § 576.106(c)):

- No financial or rental assistance can be provided to a household receiving the same type of assistance from another public source for the same time period (except 6 months of the tenant's portion of arrears).
- Rental assistance may not be provided to program participants who are currently receiving replacement housing payments under the URA.
- Rental assistance may be provided to an eligible program participant who is living in a housing unit developed with Low Income Housing Tax Credits or other development subsidies. Development subsidies are not considered rental assistance under ESG and therefore, they do not trigger the use with other subsidies restriction.

Leases and Rental Assistance Agreements

Each program participant receiving rental assistance through ESG must have a legally binding, written lease for the rental unit, unless the assistance is solely for rental arrears. The lease must be between the owner and the program participant. Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease or agreement if: 1) the agreement gives the program participant an enforceable leasehold interest under state law and the agreement, and 2) rent owed is sufficiently documented by the owner's financial records, rent ledgers, or canceled checks. In addition, a rental assistance agreement is required between the subrecipient and the landlord. A subrecipient may make rental assistance payments only to an owner with whom the subrecipient has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements listed in this section. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the subrecipient a copy of any notice to the program participant to vacate the housing unit or any complaint used under state or local law to commence an eviction action against the program participant. The City of Detroit encourages prevention providers to assist residents in negotiating their lease or rental contract in order to ensure long term housing stability.

The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease. The landlord must agree to enter into the Rental Assistance Agreement every 90 days (upon client recertification).

The rental assistance agreement with the landlord must terminate and no further rental assistance payments under that agreement may be made if:

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

The subrecipient must make timely payments to each owner in accordance with the lease and rental assistance agreement. The subrecipient is solely responsible for paying late payment penalties that it incurs with non-ESG funds.

Conflicts of Interest

In accordance with [24 CFR 576.404](#), no type or amount of ESG assistance can be conditioned on an individual or family's acceptance of housing owned by the recipient, subrecipient, contractor, parent, or subsidiary of the subrecipient. In addition, no subrecipient (nor any of its parent or subsidiary organizations) that owns housing, carried out the initial evaluation under 24 CFR 576.401, or administered homelessness prevention assistance for occupants of that subrecipient's housing.

Organizations are required to have policies and procedures to prevent organizational conflicts of interest.

Fair Market Rent and Rent Reasonableness Requirements

Rental assistance cannot be provided for a housing unit unless the total rent for the unit does not exceed the fair market rent (FMR) established by HUD, as provided under [24 CFR 982.503](#). The total rent for the unit must also comply with HUD's standard of rent reasonableness, as established under [24 CFR 982.507](#). These rent restrictions are intended to ensure that program participants can remain in their housing after their ESG assistance ends.

Rent reasonableness and FMR requirements do not apply when a program participant receives only financial assistance or services under Housing Stabilization and Relocation Services. This includes rental application fees, security deposits, an initial payment of last month's rent, utility payments/deposits, moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, legal services, and credit repair.

Note that this guidance only applies to the Homeless Prevention and Rapid Re-Housing components of ESG. For guidance on CoC rules regarding FMR and rent reasonableness, please consult the following [HUD Exchange resource](#).

Rent Reasonableness

The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units.

In many areas, the easiest way to determine rent reasonableness is to use a housing database search engine that will compare units and rents against one another. One option is [Michigan Housing Locator](#). Other local resources may also be used to obtain information, such as market surveys, classified ads, and information from real estate agents. When comparing rent reasonableness, the proposed unit must be compared to at least three other units.

Fair Market Rent (FMR)

FMRs are gross rent estimates. The U.S. Department of Housing and Urban Development (HUD) annually estimates FMRs for 530 metropolitan areas and 2,045 nonmetropolitan county areas. HUD sets FMRs to assure that a sufficient supply of rental housing is available to program participants. By law, HUD is required to publish new FMRs at the start of each federal fiscal year on October 1. Fair Market Rents are updated by HUD every year and can be found online at: <http://www.huduser.org/portal/datasets/fmr.html>

Inspection and Lead-Based Paint Requirements

All units occupied by or anticipated to be occupied by prevention participants must meet minimum quality standards for inspection and lead-based paint. See Appendix IV for information regarding inspection requirements and Appendix V for information regarding lead-based paint requirements.

Section 10: Homeless Management Information System (HMIS)



Overview

All projects funded with City of Detroit ESG and/or Detroit Continuum of Care funds, except those that are specifically for survivors of domestic violence, must participate in the Homeless Management Information System (HMIS). An HMIS is a locally managed database covering all HUD-funded homeless-serving programs within the ESG/Continuum of Care geography. Often other programs use HMIS as well. In Detroit, HMIS is administered by the Homeless Action Network of Detroit (HAND). Data from the HMIS is necessary to meet several federal reporting requirements, including the production of the Consolidated Annual Performance and Evaluation Reports (CAPER) and Annual Performance Report (APR) for each program as well as system-wide reporting such as the Housing Inventory Count (HIC), Longitudinal Systems Analysis (LSA), the Point-in-Time (PIT) count, System Performance Measures (SPMs) and other reports. All programs are expected to abide by the Detroit CoC HMIS Policies and Procedures which are published on [HAND'S website](#).

Note: It is the subrecipient's responsibility to ensure their programs are set up in HMIS and that staff is properly trained on HMIS policies and procedures. Please reach out to HAND to onboard a new program or staff.

For additional guidance on HMIS see the [HUD exchange](#) resource page.

Please note that domestic violence agencies are exempted and prohibited from entering data into HMIS. Domestic violence agencies must maintain a comparable database that collects similar information in order to provide aggregate data or reporting purposes. Additionally, some legal service providers may determine that entering client data into HMIS violates the attorney/client privilege of their clients. These providers may decide to use a comparable database for records to maintain attorney/client privilege.

Eligible Activities

ESG subrecipients may use ESG funds to pay for costs related to contributing data to the HMIS system. Subrecipients using these funds must fully comply with HUD's HMIS standards on participation, data collection, and reporting.

The subrecipients may use ESG funds to:

- Purchase or lease computer hardware
- Purchase software or software licenses
- Purchase or lease equipment, including telephones, fax machines, and furniture
- Obtain technical support
- Lease office space
- Pay charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS
- Pay salaries for HMIS operating activities, including:
 - Completing data entry
 - Monitoring and reviewing data quality
 - Completing data analysis

- Reporting to the HMIS Lead
- Training staff on use of the HMIS or a comparable database
- Implementing and complying with HMIS requirements
- Pay costs of staff to travel to and attend HUD-sponsored and HUD-approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act
- Pay staff travel costs to conduct intake
- Pay participation fees charged by the HMIS Lead, if the recipient or subrecipient is not the HMIS Lead.

Data Quality

Data quality is an integral part of the homelessness response system, as it helps with identifying trends and system gaps, and funding allocations. All organizations entering data in HMIS must comply with the follow data quality requirements:

1. Agencies must require documentation at intake of the homeless status of those they serve according to the reporting and eligibility guidelines issued by HUD.
2. 100% of the clients must be entered into HMIS as close to real time as possible, but if not, within 48 hours of entry or exit. Emergency shelters should attempt to have data entered on the same day of entry or exit. If the information is not entered on the same day it is collected, the agency must ensure that the date associated with the information is the date on which the data was collected.
3. All staff are required to be trained on the [Definition of Homelessness](#).
4. The “First Name”, “Last Name”, “Date of Birth”, and “Gender” fields must be collected to create the client’s unique identifier.
5. The agency must have a process to ensure the First and Last Names are spelled properly and that the date of birth and Social Security numbers are accurate.
6. Income, non-cash benefits and health insurance information must be updated at least annually and at exit, or at the frequency specified by program requirements.
7. Agencies must have an organized exit process.
8. Agency Administrators/staff regularly run data quality reports.
9. CoCs and Agencies are required to review Outcome Performance Reports/System Performance Measures reports defined by HUD and other funding organizations. Measures are based on Project Type. The Local HMIS Lead Agency, in collaboration with the CoC Reports Committee or other designated CQI Committee, establishes local benchmark targets for performance improvement on shared measures.
10. MSHMIS publishes regional benchmarks on all defined measures annually.
11. Agencies are expected to participate in the CoCs Continuous Quality Improvement Plan. See CQI materials designed to support data quality through continuous quality improvement.

Section 11: Eligible Participation and Recordkeeping



Overview

In accordance with [24 CFR 576.500](#), the subrecipient must have policies and procedures to ensure the requirements of this part are met, including those required by [2 CFR part 200](#). The policies and procedures must be established in writing and implemented by the subrecipients to ensure that ESG funds are used in accordance with the requirements. In addition, sufficient records must be established and maintained to enable the recipient and HUD to determine whether ESG requirements are being met.

Homeless Categories

All subrecipients must follow intake procedures to ensure program compliance with the homeless definition outlined below ([24 CFR 576.2](#)). Program must obtain and verify documentation of homelessness upon intake.

The following populations are eligible for ESG programs per HUD's homeless definition:

Category 1: Literally Homeless

An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

1. Has a primary nighttime residence that is a public or private place not meant for human habitation;
2. Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or
3. Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

Category 2: Imminent Risk of Homelessness

An individual or family who will imminently lose their primary nighttime residence, provided that:

1. Residence will be lost within 14 days of the date of application for homeless assistance;
2. No subsequent residence has been identified; and
3. The individual or family lacks the resources or support networks, needed to obtain other permanent housing.

Category 3: Homeless Under Other Federal Statutes

Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

1. Are defined as homeless under the other listed federal statutes
2. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;

3. Have experienced persistent instability as measured by two moves or more during the preceding 60 days; and
4. Can be expected to continue in such status for an extended period of time because of special needs or barriers

Category 4: Fleeing/Attempting to Flee Domestic Violence

Any individual or family who:

1. Is fleeing, or is attempting to flee, domestic violence;
2. Has no other residence; and
3. Lacks the resources or support networks to obtain other permanent housing.

Eligible populations vary by program type. See each program section for additional information.

Record Keeping Requirements

ESG programs are required to keep both demographic (data elements required by HUD) and service records (e.g., case notes, case plans, bed lists, leases, etc.). Subrecipients are responsible for verifying and documenting the eligibility of all ESG clients prior to providing ESG shelter and/or assistance. This documentation must be maintained in the participant's case file.

Documentation of eligibility is required for all program participants upon intake, including those who are literally homeless. However, the absence of third-party documentation should not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or receiving services provided by a victim services provider.

In instances of individuals or families being admitted to emergency shelter, the City of Detroit expects to see certification by the individual or head of household as the primary method of establishing homeless eligibility. In these instances, the City of Detroit would consider a sign-in sheet, with a certification that the individual or head of household seeking assistance is homeless typed at the top, as meeting this standard.

Subrecipients are required to keep records of the following:

- Coordinated entry system procedures, including written intake procedures developed by the Continuum of Care in accordance with the requirements established by HUD
- Rental assistance agreements and payments, including copies of all leases and rental assistance agreements for the provision of rental assistance, documentation of payments made to owners for the provision of rental assistance, and supporting documentation for these payments including dates of occupancy by program participants
- Current Accounts Receivable and Income Tax Clearances for the City of Detroit
- The monthly allowance for utilities (excluding telephone) used to determine compliance with the rent restriction

- Compliance with the shelter and housing standards in [24 CFR 576.403](#), including inspection reports
- Types of services provided under ESG, including rental assistance, housing stabilization, and relocation services, and the amounts spent on these services and assistance
- Compliance with the requirements of [24 CFR 576.400](#) for consulting with the Continuum of Care and coordinating and integrating ESG assistance with programs targeted toward persons experiencing homelessness and mainstream service and assistance programs
- Participation in HMIS or a comparable database
- Records of the source and use of contributions made to satisfy the matching requirement
- Compliance with organizational conflicts-of-interest requirements in [24 CFR 576.404\(a\)](#), a copy of the personal conflicts of interest policy or codes of conduct developed and implemented to comply with the requirements in [24 CFR 576.404\(b\)](#), and records supporting exceptions to the personal conflicts of interest
- Compliance with the homeless participation requirements under [24 CFR 576.405](#)
- Compliance with faith-based activities requirements under [25 CFR 576.407](#)
- Compliance with the nondiscrimination and equal opportunity requirements under [24 CFR 576.407\(a\)](#)
- Compliance with the uniform administrative requirements in [24 CFR part 84](#)
- Compliance with the environmental review requirements, including flood insurance requirements
- Certifications and disclosure forms required under the lobbying and disclosure requirements in [24 CFR part 87](#)
- Compliance with the displacement, relocation, and acquisition requirements in [24 CFR 576.408](#)
- Documentation of how ESG funds were spent on allowable costs in accordance with the requirements for eligible activities
- Receipt and use of program income
- Procurement contracts and documentation of compliance with the procurement requirements
- Written confidentiality procedures to ensure:
 - All personally identifying information of any individual or family who applies for and/or receives ESG assistance will be kept secure and confidential.
 - The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter.
 - The address or location of any housing of a program participant will not be made public, except as provided under a pre-existing privacy policy of the subrecipient and consistent with state and local laws regarding privacy and obligations of confidentiality.
- Program participant records that include the following:
 - Documentation of homelessness or at risk of homelessness status
 - Compliance with regulations related to providing program services in accordance with program components and eligible activities, determining eligibility and amount and type of assistance, and using appropriate assistance and services (see [24 CFR 576.101](#), [24 CFR 576.106](#), [24 CFR 576.401\(a\)](#) and (b), and [24 CFR 576.401](#) (d) and (e)).
 - Initial consultation form and case notes
 - Intake and certification form

- Follow-up case manager/client meetings and at least monthly case notes
- Documented individualized housing and service plan, including a path to permanent housing stability
- Documentation of financial assistance payment (must include the type of assistance, payee name, client name, check number, and amount paid using ESG funds)
- Documentation of services and assistance provided to the program participant, including, as applicable, the security deposit, rental assistance, and utility payments made on behalf of the program participant
- Determinations of ineligibility or termination of assistance (if applicable)
 - For each individual and family determined ineligible to receive ESG assistance, the client file must include documentation of the reason for that determination.
 - Documentation of termination of assistance must comply with the requirements in [24 CFR 576.402](#).
- Documentation of the HMIS client ID number or a documented reason why the number is not available

Documenting Homeless Status

In accordance with record keeping requirements outlined in [24 CFR 576.500\(b\)](#), all programs must require documentation of homelessness status at time of intake. Obtaining evidence of homelessness should follow the following order of priority:

1. Third-party documentation
2. Intake worker observations
3. Self-certification

Please note that lack of third-party documentation should not prevent an individual or family from immediately being admitted to an emergency shelter or receiving outreach services.

The sections below outline the required documentation and order of priority for obtaining evidence of homelessness.

Street Outreach

Eligibility

Street outreach programs must serve who qualify as homeless under paragraph (1)(i) of the “homeless” definition under [§ 576.2](#). This includes an individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: they have a primary nighttime residence that is a public or private place not meant for human habitation.

Category 1: Literally Homeless Clients

For applicants who lack a fixed, regular, and adequate nighttime residence, meaning nightly residence may be in: car; park; abandoned building; bus or train station; encampment; airport; camping ground; or hotel

and motels paid for by charitable organizations or federal, state or local government programs. For these applicants, any of the following forms of documentation may be used:

1. Written observation by the outreach worker of the conditions where the individual or family was living,
2. Written referral by another housing or service provider
3. Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter

For an individual who is exiting an institution where he/she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution, any of the following forms of documentation may be used:

1. Written observation by the outreach worker
2. Written referral by another housing or service provider
3. Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter **and**
 - i. Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution. All oral statements must be recorded by the intake worker, or
 - ii. Written record of intake worker's due diligence in attempting to obtain the evidence described above and certification by the applicant that states he/she is exiting or has just exited an institution where he/she resided for 90 days or less.

Emergency Shelter

Eligibility

- All persons served by Emergency Shelter Program services must meet either Category 1 or Category 4 of HUD's definitions of homelessness as defined in [24 CFR 577](#) at time of acceptance into an emergency shelter program. Refer to the glossary of terms in the beginning of this document for additional guidance on the definitions.
- There is no income limitation for entry into Emergency Shelter.
- While shelters may ask for identification for all members of the households, inability to produce this documentation is **NOT** a barrier for entry or reason for denial.

Documenting Homeless Status

Recipients and subrecipients operating emergency shelters can document homeless status through a certification by the individual or head of household as the primary method of establishing homeless eligibility. In these instances, one method of meeting this standard would be to require households to complete a sign-in sheet, with a statement at the top informing the individual or head of household that by signing, they certify that they are homeless. *Note: Under no circumstances must the lack of third-party documentation prevent an individual or family from being immediately admitted to emergency shelter,*

receiving street outreach services, or being immediately admitted to receive shelter or services provided by a victim service provider.

Shelters **cannot** require the following documentation as a condition of admission: (list include but not limited to.)

- Proof of citizenship
- Marriage Certificates
- Medical and Mental Health diagnosis and medication compliance
- Vital documents such as ID, birth certificate, or social security cards

Category 1: Literally Homeless Clients

For applicants who lack a fixed, regular, and adequate nighttime residence, meaning nightly residence may be in: car; park; abandoned building; bus or train station; airport; camping ground; or hotel and motels paid for by charitable organizations or federal, state or local government programs. Any of the following forms of documentation may be used, however the priority of types of documentation are as follows:

1. Written observation by the outreach worker
2. Written referral by another housing or service provider
3. Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter

For an individual who is exiting an institution where he/she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution, any of the following forms of documentation may be used:

1. Written observation by the outreach worker
2. Written referral by another housing or service provider
3. Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter **AND**
 - i. Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution. All oral statements must be recorded by the intake worker, **OR**
 - ii. Written record of intake worker's due diligence in attempting to obtain the evidence described above **and** certification by the applicant that states he/she is exiting or has just exited an institution where he/she resided for 90 days or less.

Category 4: Fleeing/Attempting to Flee Domestic Violence Clients

For Victim Service Providers:

- An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

For Non-Victim Service Providers:

- An oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the care worker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified **AND**
- Certification by the individual or head of household that no subsequent residence has been identified **AND**
- Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Rapid Re-housing

Category 1: Literally Homeless Clients

For applicants who lack a fixed, regular, and adequate nighttime residence, meaning nightly residence may be in: car; park; abandoned building; bus or train station; airport; camping ground; or hotel and motels paid for by charitable organizations or federal, state or local government programs. Any of the following forms of documentation may be used, however the priority of types of documentation are as follows:

4. Written observation by the outreach worker
5. Written referral by another housing or service provider
6. Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter

For an individual who is exiting an institution where he/she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution, any of the following forms of documentation may be used:

4. Written observation by the outreach worker
5. Written referral by another housing or service provider
6. Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter **AND**
 - iii. Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution. All oral statements must be recorded by the intake worker, **or**
 - iv. Written record of intake worker's due diligence in attempting to obtain the evidence described above and certification by the applicant that states he/she is exiting or has just exited an institution where he/she resided for 90 days or less.

Category 4: Fleeing/Attempting to Flee DV

For Victim Service Providers:

- An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

For Non-Victim Service Providers:

- An oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the care worker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified **AND**
- Certification by the individual or head of household that no subsequent residence has been identified **AND**
- Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Homelessness Prevention

Providers must only serve individuals and families that have an annual income below 30% of annual area median income (AMI).

Category 2: Imminent Risk of Homelessness Clients

Verification of at-risk of homelessness status, which may include:

- A court order resulting from an eviction action notifying the individual or family that they must leave their residence within 14 days after the date of their application for homeless assistance; or the equivalent notice under applicable state law; or a Notice to Quit, or a Notice to Terminate issued under state law **OR**
- For individuals and families whose primary nighttime residence is a hotel or motel room not paid for by charitable organizations or federal, state, or local government programs for low-income individuals, evidence that the individual or family lacks the resources necessary to reside there for more than 14 days after the date of application for homeless assistance **OR**
- An oral statement by the individual or head of household that the owner or renter of the housing in which they currently reside will not allow them to stay for more than 14 days after the date of application for homeless assistance. The intake worker must record the statement and certify that it was found credible. To be found credible, the oral statement must either:
 - Be verified by the owner or renter of the housing in which the individual or family resides at the time of application for homeless assistance and documented by a written certification by the owner or renter or by the intake worker's recording of the owner or renter's oral statement; or
 - Be documented by a written certification by the intake worker of his/her due diligence in attempting to obtain the owner or renter's verification and the written certification by the individual or head of household seeking assistance that his/her statement was true and complete **and**
 - Certification that no subsequent residence has been identified **and**

- Self-certification or other written documentation that the individual lacks the financial resources and support necessary to reside there for more than 14 days after the date of application for homeless prevention

Category 4: Fleeing/Attempting to Flee Domestic Violence Clients

For Victim Service Providers:

- An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

For Non-Victim Service Providers:

- An oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the care worker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified.
- Certification by the individual or head of household that no subsequent residence has been identified
- Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Homeless Prevention: At Risk of Homelessness

Where the program participant qualified as at-risk of homelessness under paragraph (1) of the definition, the records should reflect that the household's income is below 30 percent of the area median income as evidenced by an income evaluation form containing HUD's minimum requirements and at least one of the following:

- Source documents for the assets held by the program participant and source documents of the income received over the most recent period for which representative data is available before the date of intake.
- Written statement by the relevant third party (e.g., employer) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party of the income of the program participant received over the most recent period for which representative data are available.
- Written certification by the program participant of the amount of income the program participant received for the most recent period representative of the income that the program participant is reasonably expected to receive over the 3- month period following the evaluation.
- Where the program participant qualified as at-risk of homelessness under paragraph (1) of the definition, do the records reflect the program participant's written certification that the program participant has insufficient financial resources and support networks immediately available to attain housing stability and meets one or more of the conditions under paragraph [\(1\)\(iii\) of the "at risk of homelessness" definition](#)

- Where the program participant qualified as at-risk of homelessness under paragraph (1) of the definition, do the records show reasonable efforts to verify that the program participant did not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the homeless definition, as evidenced by one of the following:
 - Source documents (e.g., notice of termination from employment, bank statement, or health care bill showing arrears)
 - A written verification by the relevant third party or written certification by the recipient's/subrecipient's intake staff of the oral verification by the relevant third party; or
 - A written statement by the recipient's/subrecipient's intake staff of the efforts taken to obtain verification through source documents and relevant third parties
- Where the program participant qualified as at-risk of homelessness under paragraph (1) of the definition, do the records show reasonable efforts to verify that the program participant met one of the seven conditions under paragraph (1)(iii), as evidenced by one of the following:
 - Source documents that evidence one or more of the conditions.
 - A written statement by the relevant third party or the written certification by the recipient's/subrecipient's intake staff of the oral verification by the relevant third party that the applicant meets one or more of the conditions
 - A written statement by the recipient's or subrecipient's intake staff that the staff person has visited the applicant's residence and determined that the applicant meets one or more of the conditions. If a visit is not feasible or relevant to the determination, a written statement by the recipient's/subrecipient's staff describing the efforts taken to obtain the required evidence.

NOTE: The conditions are: (1) has moved because of economic reasons two or more times during the 60 days immediately preceding the application for assistance; (2) is living in the home of another because of economic hardship; (3) has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of the application for assistance; (4) lives in a hotel or motel and the cost is not paid by charitable organizations, federal, state, or local government programs for low-income individuals; (5) lives in an SRO or efficiency apartment in which there resides more than two persons, or lives in a larger housing unit in which there resides more than 1.5 persons per room, as defined by the U.S. Census Bureau; (6) is exiting a publicly-funded institution, or system of care, or (7) otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness as identified in the ESG recipient's Consolidated Plan.

Where the program participant qualified as at-risk of homelessness under paragraph (2), do the records reflect that the program participant met the definition of homeless under one of the following Federal statutes, as evidenced by a certification of the child's or youth's homeless status by the agency or organization responsible for administering assistance under the statute:

- Runaway and Homeless Youth Act
- Head Start Act
- Subtitle N of the Violence Against Women Act of 1994
- Section 330 of the Public Health Service Act

- The Food and Nutrition Act of 2008
- Section 17 of the Child Nutrition Act of 1966

Where the program participant qualified as at-risk of homelessness under paragraph (3), the records should reflect that the child or youth in the household qualified as homeless under subtitle B of title VII of the McKinney- Vento Homeless Assistance Act, as evidenced by certification of the child or youth's homeless status from an agency or organization that administers assistance under the Education for Homeless Children and Youth Program. **NOTE:** Under this paragraph of At-Risk of Homelessness the certification need only specify that the child meets the definition under subtitle B of title VII of the McKinney-Vento Homeless Assistance Act.

Period of Record Retention

Records related to each fiscal year of ESG funds must be retained for the greater of five years or the period specified below:

1. Documentation of each program participant's qualification as a family or individual at risk of homelessness or as a homeless family or individual as well as other program participant records must be retained for 5 years **after** the expenditure of all funds from the grant under which the program participant was served.
2. Where the ESG funds that are used for the renovation of an emergency shelter exceed 75 percent of the value of the building before renovation, records must be retained until 10 years after the date that ESG funds are first obligated for the renovation.
3. Where the ESG funds that are used to convert a building into an emergency shelter exceed 75 percent of the value of the building after conversion, records must be retained until 10 years after the date that ESG funds are first obligated for the conversion.

Access to Records

Subrecipients must comply with the requirements for access to records which establish that HUD, the HUD Office of the Inspector General, and the Comptroller General of the United States, or any of their authorized representatives, and the City of Detroit, must have the right of access to all documents, papers, or other records kept by the subrecipient relevant to the ESG award. This also includes access to subrecipients' staff for the purpose of interview and discussion of documents. These rights last as long as the records are retained.

Written Standards Requirements for Subrecipients

Subrecipients must develop policies and procedures to ensure appropriate documentation is obtained and included in clients' files. In accordance with [24 CFR 576.401\(a\)](#), subrecipients must conduct an initial evaluation to determine each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing. These evaluations must be conducted in accordance with the local CoC's written standards, including the processes for coordinated entry.

Detailed Documentation Options and Types

Specific information about documentation requirements for client files is provided in the sections below.

Intake/Discharge Forms

Subrecipients are required to collect basic demographic data on persons served with ESG funds. This data includes but is not limited to the information outlined in HUD's Homeless Management Information System (HMIS) Data Standards. Subrecipients can review the HMIS Data Standards online at <https://files.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual-2024.pdf>

- Clients must be referred to ESG providers/services through Detroit CoC's coordinated entry system.
- Subrecipients should use the intake/discharge forms required by the Detroit CoC posted at <http://www.handetroit.org/assessments>
- CoC and ESG subrecipients are responsible for ensuring that required intake/discharge forms collect the information needed and are in compliance with HUD regulations/policies.
- Clients have the right to decline to answer any questions on an intake/discharge form or decline to have their data entered into HMIS and/or a comparable database.

Universal Data Elements

Universal data elements are those which all HMIS participating continuum projects are required to complete. It is important to note that federal funding sources (programs) often require the projects they fund to maintain and report on additional data elements – identified as Program Specific elements.

HMIS Universal Data Elements are elements required to be collected by all projects using the software as an HMIS. Projects funded by any one or more of the federal partners must collect the Universal Data Elements as are projects that are not funded by any federal partner (e.g. missions) but are entering data as part of the Continuum of Care's HMIS implementation.

Universal data elements enable the HMIS the ability to record unique, unduplicated client records, establish participation in a project within a date range, and identify clients who meet time criteria for chronic homelessness.

The Universal Data Elements include:

- 3.01 Name
- 3.02 Social Security Number
- 3.03 Date of Birth
- 3.04 Race and Ethnicity
- 3.06 Gender
- 3.07 Veteran Status
- 3.08 Disabling Condition
- 3.10 Project Start Date

- 3.11 Project Exit Date
- 3.12 Destination
- 3.15 Relationship to Head of Household
- 3.16 Client Location
- 3.20 Housing Move-in Date
- 3.917 Living Situation

Refer to the [HUD's HMIS Data Standards Manual](#) for universal data elements requirements. Refer to Table 2 for program specific data elements.

Program Specific Data Elements

#	Element	Street Outreach	Emergency Shelter	Prevention	Rapid Re-Housing	Coordinated Entry
4.02	Income and Sources	X	X	X	X	X
4.03	Non-Cash Benefits	X	X	X	X	X
4.04	Health Insurance	X	X	X	X	X
4.05	Physical Disability	X	X	X	X	X
4.06	Developmental Disability	X	X	X	X	X
4.07	Chronic Health Condition	X	X	X	X	X
4.08	HIV/AIDS	X	X	X	X	X
4.09	Mental Health Problem	X	X	X	X	X
4.10	Substance Abuse	X	X	X	X	X
4.11	Domestic Violence	X	X	X	X	X
4.12	Current Living Situation	X				X
4.13	Date of Engagement	X				
4.14	Bed Night					

4.19	Coordinated Entry Assessment					X
4.20	Coordinated Entry Event					X

X = Data collection is required

Case/Service Notes

Subrecipients must document the services provided to program participants using case notes. Case notes must:

- Be legible and securely stored in the client file (either electronically in HMIS or comparable database),
- Sufficiently detail the services provided, including the date, time, type of service, and staff member(s) assisting,
- Spell out the client’s housing plan (to leave or avoid shelter) and any goals they might have set for themselves, and
- Include any other relevant information
- Recorded in HMIS under the case plans module.

HMIS/Comparable Database Release

In compliance with 24 CFR [576.400 \(f\)](#), all data on all persons served under ESG must be entered into HMIS or a comparable database (if a subrecipient is a Domestic Violence services agency). If data is entered into an HMIS or comparable database where data is shared between providers (also known as an open system), there must be a signed consent to input information into the database. Subrecipients should use the [Detroit CoC HMIS release form](#).

Period of Record Retention

Records related to each fiscal year of ESG funds must be retained for the greater of five years or the period specified below:

1. Documentation of each program participant's qualification as a family or individual at risk of homelessness or as a homeless family or individual as well as other program participant records must be retained for 5 years **after** the expenditure of all funds from the grant under which the program participant was served.
2. Where the ESG funds that are used for the renovation of an emergency shelter exceed 75 percent of the value of the building before renovation, records must be retained until 10 years after the date that ESG funds are first obligated for the renovation.
3. Where the ESG funds that are used to convert a building into an emergency shelter exceed 75 percent of the value of the building after conversion, records must be retained until 10 years after the date that ESG funds are first obligated for the conversion.

Access to Records

Subrecipients must comply with the requirements for access to records which establish that HUD, the HUD Office of the Inspector General, and the Comptroller General of the United States, or any of their authorized representatives, and the City of Detroit, must have the right of access to all documents, papers, or other records kept by the subrecipient relevant to the ESG award. This also includes access to subrecipients' staff for the purpose of interview and discussion of documents. These rights last as long as the records are retained.

Section 12:

Grant Administration



Conflict of Interest

For the procurement of goods and services, subrecipients must comply with the codes of conduct and conflict of interest requirements under [2 CFR 200.112](#) . For all other activities, the ESG Interim Rule establishes that any employee, agent, consultant, officer, or elected or appointed official of the subrecipient who has functions or responsibilities related to the ESG program and its activities or who is in a position to participate in a decision-making process or gain inside information about the program, may not:

- Obtain a financial interest or benefit from an ESG-assisted activity
- Have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity
- Have a financial interest in the proceeds derived from an ESG-assisted activity, either for themselves or those with whom they have family or business ties.

This applies during the person's tenure with the program and for the one-year period following their tenure.

In addition, a subrecipient may not condition any type or amount of ESG assistance on an individual's or family's acceptance or occupancy of emergency shelter or housing owned by the City of Detroit, the subrecipient, or a parent or subsidiary of the subrecipient. For individuals or families occupying housing that is owned by the subrecipient (or a parent or subsidiary of the subrecipient), the subrecipient may not complete the initial evaluation required under [24 CFR 576.401](#) (i.e., the evaluation of program participant eligibility and needs) or administer homelessness prevention assistance.

Exceptions

Subrecipients may submit a written request for an exception to the conflicts of interest provisions. This request should be submitted to the City of Detroit, which will then submit the request to HUD. HUD will only consider the exception request if all of the following documentation is submitted:

- A disclosure of the nature of the conflict, accompanied by an assurance that there has been public disclosure of the conflict and a description of how the public disclosure was made
- An opinion of the subrecipient's and City of Detroit's attorneys that the interest for which the exception is sought would not violate state or local law.

Please see [24 CFR 576.404](#) for more information.

Non-Discrimination, Equal Opportunity, and Affirmative Outreach

Subrecipients are required to ensure that ESG-funded services are made available to all on a nondiscriminatory basis, and to publicize this fact. This availability must reach persons of any particular race, color, religion, sex, age, familial status, national origin, or disability within the agency's service area. If it is unlikely that the procedures that the subrecipient intends to use to make known the availability

services will reach persons of any particular race, color, religion, sex, age, familial status, national origin, or disability who may qualify for those facilities and services, the subrecipient must establish additional procedures that ensure that those persons are made aware of the services. Subrecipients must take appropriate steps to ensure effective communication with persons with disabilities including, but not limited to adopting procedures that will make available to interested persons information concerning the location of assistance, services, and facilities that are accessible to persons with disabilities. Consistent with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, subrecipients are also required to take reasonable steps to ensure meaningful access to programs and activities for limited English proficiency (LEP) persons.

Uniform Administrative Requirements

The requirements of 24 CFR Part 84, except 24 CFR 84.23 (i.e., cost sharing or matching) and 24 CFR 84.53 (i.e., property standards) do not apply, and program income is to be used as the nonfederal share under 24 CFR 84.24(b). These regulations include allowable costs and non-federal audit requirements. See [24 CFR Part 84](#) for more information.

Environmental Review Responsibilities

ESG activities are subject to environmental review by HUD under [24 CFR Part 50](#). The City of Detroit is responsible for supplying all available, relevant information necessary for HUD to perform for each property any environmental review required by [24 CFR Part 50](#). The City of Detroit is also required to carry out mitigating measures required by HUD or select an alternate eligible property. HUD may eliminate from consideration any application that would require an Environmental Impact Statement (EIS).

The City of Detroit and ESG subrecipients, including any contractors of subrecipients, may not acquire, rehabilitate, convert, lease, repair, dispose of, demolish, or construct property for an ESG project, or commit or expend HUD or local funds for eligible ESG activities, until HUD has performed an environmental review under [24 CFR Part 50](#). The City of Detroit must have received HUD approval of the property prior to any ESG activities beginning.

To request an environment review please fill out this [form](#).

Davis-Bacon Act

The Davis-Bacon Act (40 U.S.C. 276a to 276a-5) does not apply to the ESG program.

Procurement of Recovered Materials

The City of Detroit and its contractors must comply with Section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. The requirements of Section 6002 include procuring only items designated in guidelines of the Environmental Protection Agency (EPA) at [40 CFR part 247](#) that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the items exceeds \$10,000 or the value of the quantity acquired by the preceding fiscal year exceeded \$10,000; procuring solid waste management

services in a manner that maximizes energy and resource recovery; and establishing an affirmative procurement program for procurement of recovered materials identified in the EPA guidelines.

Section 504 of the Rehabilitation Act of 1973

Subrecipients must comply with Section 504 of the Rehabilitation Act of 1973 (The Act). Pursuant to the requirement of The Act, subrecipients must ensure that no otherwise qualified disabled person shall, solely by reason of their disability, be excluded from the participation in, be denied the benefits of, or be subject to discrimination (including discrimination in employment) in, any program or activity that receives or benefits from Federal financial assistance. The subrecipient must also ensure that requirements of The Act shall be included in the agreements with and be binding on all of its subrecipients, contractors, subcontractors, assignees, or successors.

Faith-Based Activities

Organizations that are religious or faith-based are eligible, on the same basis as any other organization, to receive ESG funds. Neither the federal government nor a state or local government receiving funds under ESG shall discriminate against an organization based on the organization's religious character or affiliation.

Faith-based organizations are eligible to receive ESG funds per [24 CFR 576.406](#) under the following conditions:

- Organizations that are directly funded under the ESG program may not engage in inherently religious activities, such as worship, religious instruction, or proselytization as part of the programs or services funded under ESG. If an organization conducts these activities, the activities must be offered separately, in time or location, from the programs or services funded under ESG and participation must be voluntary for program participants.
- Any religious organization that receives ESG funds retains its independence from federal, state, and local governments, and may continue to carry out its mission, including the definition, practice, and expression of its religious beliefs, provided that the religious organization does not use direct ESG funds to support any inherently religious activities (such as worship, religious instruction, or proselytization). Among other things, faith-based organizations may use space in their facilities to provide ESG-funded services, without removing religious art, icons, scriptures, or other religious symbols. In addition, an ESG-funded religious organization retains its authority over its internal governance and the organization may retain religious terms in its organization's name, select its board members on a religious basis, and include religious references in its organization's mission statements and other governing documents.
- An organization that receives ESG funds shall not, in providing ESG assistance, discriminate against a program participant or prospective program participant based on their religion or religious beliefs.
- ESG funds may not be used for the rehabilitation of structures to the extent that those structures are used for inherently religious activities. ESG funds may be used for the rehabilitation of structures only to the extent that those structures are used for conducting eligible activities under

the ESG program. Where a structure is used for both eligible and inherently religious activities, ESG funds may not exceed the cost of those portions of the rehabilitation that are attributable to eligible activities in accordance with the cost accounting requirements applicable to ESG funds. Sanctuaries, chapels, or other rooms that an ESG-funded religious congregation uses as its principal place of worship, however, are ineligible for funded improvements under the program. Disposition of real property after the term of the grant, or any change in use of the property during the term of the grant, is subject to government-wide regulations governing real property disposition (see [2 CFR 200](#)).

- If the recipient or a subrecipient that is a local government voluntarily contributes its own funds to supplement federally-funded activities, the subrecipient has the option to segregate the federal funds or commingle them. However, if the funds are commingled, this section applies to all of the commingled funds.

Lobbying Requirements

Subrecipients must include Lobbying Policies in their program policies and procedures that summarize the community or subrecipient's policy on employee contacting or communicating with a federal agency, member of congress, or congressional staff member as an advocate for funding of any program.

Financial Management and Procurement Requirements

Subrecipients must comply with applicable requirements outlined in [2 CFR 200](#) and based on their grant award year and contract.

Implementing Assistance Under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA)

Minimizing Displacement

Consistent with other goals and objectives of ESG, subrecipients must assure that they have taken all reasonable steps to minimize the displacement of persons (families, individuals, businesses, nonprofit organizations, and farms) as a result of a project assisted under ESG.

Temporary Relocation Not Permitted

No tenant-occupant of housing (a dwelling unit) that is converted into an emergency shelter may be required to relocate temporarily for a project assisted with ESG funds or be required to move to another unit in the same building/complex. When a tenant moves for a project assisted with ESG funds under conditions that trigger the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), the tenant should be treated as permanently displaced and offered relocation assistance and payments consistent with URA.

Relocation Assistance for Displaced Persons

A displaced person must be provided relocation assistance at the levels described in, and in accordance with, the URA and [49 CFR 24](#). A displaced person must be advised of their rights under the Fair Housing Act. Whenever possible, minority persons shall be given reasonable opportunities to relocate to comparable and suitable decent, safe, and sanitary replacement dwellings, not located in an area of minority concentration, that are within their financial means. This policy, however, does not require providing a person a larger payment than is necessary to enable a person to relocate to a comparable replacement dwelling. As required by Section 504 of the Rehabilitation Act and [49 CFR 24](#), replacement dwellings must also contain the accessibility features needed by displaced person with disabilities.

Displaced Person

The term “displaced person” means any person, family, individual, business, nonprofit organization, or farm, including any corporation, partnership, or association, that moves from real property, or moves personal property from real property, permanently, as a direct result of acquisition, rehabilitation, or demolition for a project assisted under the ESG program.

This includes any permanent, involuntary move for an assisted project, including any permanent move from the real property that is made:

- After the owner (or person in control of the site) issues a notice to move permanently from the property or refuses to renew an expiring lease, if the move occurs on or after:
 - The date of the submission by the City of Detroit or a subrecipient, as applicable, of an application for assistance to HUD (or the City of Detroit) that is later approved and funded if the City of Detroit or the subrecipient has site control as evidenced by a deed, sales contract, or option contract to acquire the property
 - The date on which the City of Detroit or subrecipient selects the applicable site, if the City of Detroit or subrecipient does not have site control at the time of application, provided that the City of Detroit or subrecipient eventually obtains control over the site.
- Before the date described in this section, if the City of Detroit or HUD determines that the displacement resulted directly from acquisition, rehabilitation, or demolition for the project
- By a tenant-occupant of a dwelling unit and the tenant moves after execution of the agreement covering the acquisition, rehabilitation, or demolition of the property for the project.

A person does not qualify as a displaced person if:

- The person has been evicted for cause based upon serious or repeated violation of the terms and conditions of the lease or occupancy agreement; violation of applicable federal, state, and local law, or other good cause; and the City of Detroit determines that the eviction was not undertaken for the purpose of evading the obligation to provide assistance.
- The person moved into the property after the submission of the application but before signing a lease and commencing occupancy was provided written notice of the project, its possible impact on the person (e.g., they may be displaced), and the fact that the person would not qualify as a “displaced person” as a result of the project.
- The person is ineligible under [49 CFR 24.2\(a\)\(9\)\(ii\)](#).

- HUD determines that the person was not displaced as a direct result of acquisition, rehabilitation, or demolition of the project.

The City of Detroit or a subrecipient may, at any time, request that HUD determine whether a displacement is or would be covered by this rule. See [24 CFR 576.408](#) for more information.

Section 13: Program Monitoring



Overview

The City of Detroit has a duty to ensure that all ESG funds are spent in a timely, correct fashion according to the federal and state regulations that guide the ESG program. Monitoring procedures apply to all program types (Emergency Shelter, Warming Center, Prevention, Rapid Re-Housing, Street Outreach) but may slightly differ depending on program type. For example, Emergency Shelters and Warming Centers undergo building inspections where this does not apply to other non-site based program types. Monitoring has proven an effective tool for improving subrecipient performance, establishing community best practices, and avoiding problems and challenges that subrecipients may encounter. Subrecipients will be monitored by the City of Detroit on a regular basis and according to its Monitoring Policy. They may also be monitored by HUD, either as a part of the recipient, the City of Detroit, being monitored, or they may be directly monitored by HUD.

The City of Detroit seeks to ensure that monitoring is as positive of an experience as it can be. The overall goal is to improve the provision of services for people who experience homelessness, within the constraints of the regulations. The City of Detroit does not intend to use the monitoring compliance process in a punitive, negative way.

Monitoring Process

Each year, the City of Detroit will establish the level of monitoring they will conduct based off of a risk assessment. This risk assessment is based on the determined financial and programmatic risk. If an agency or program is among those the City of Detroit determine to be monitored, the City of Detroit will reach out and inform that agency thirty (30) days before they begin the monitoring process. (In rare circumstances, such as responding to a serious complaint, the City of Detroit reserves the right to monitor with no notice.) The City of Detroit Housing and Revitalization Department conducts all programmatic monitoring. Financial Monitoring is completed by the City of Detroit's Office of the Controller. Based on the City of Detroit HRD's established policies for homeless programs, programmatic monitoring will occur on site at least bi-annually. The agency has the right to request a different date, if the agency or program has another significant event at that time. The City of Detroit will follow up with an email outlining the monitoring schedule, the activities to be reviewed, and the names of the City staff who will be conducting the monitoring visit.

The mentioned risk assessment will determine if the subrecipient is at high, medium, or low risk. The level of risk determines the type of monitoring performed. After monitoring is concluded, HRD will send their report within sixty (60) days of the date that the provider submits the materials. If there are any concerns or findings in the HRD report, providers are then required to submit their corrections within two (2) weeks.

On-Site Monitoring

On-site monitoring involves staff from the City of Detroit working on-site at the project. The monitoring will usually involve some or all of the following activities:

- Interviews with staff and residents that either work at or use the project
- A review of ESG financial and program materials related to the project
- A physical inspection of the project.

On-site monitoring can take anywhere from half a day to several days, depending on the activities reviewed and the size of the project.

If the City of Detroit monitors on-site, City staff will need access to a quiet space where they can work and review materials, as well as a confidential space where they can speak to managers, staff, and clients.

During the Visit

The City of Detroit staff will spend the monitoring visit carrying out the activities listed above. During the visit, access to a private room and internet will be needed. They will evaluate the data that an agency provides and draw conclusions. The conclusions will be supported by documentation, particularly if these conclusions become findings or concerns.

During the visit, the City of Detroit reserves the right to request additional files, materials, or people to be interviewed. City of Detroit staff will also conduct an inspection of the building with the [ESG Minimum Habitability Standards For Emergency Shelter Checklist Tool](#).

Exit Conference

At the end of the visit, City of Detroit staff will meet with the agency to provide a short, verbal summary of the conclusions that they have drawn.

An agency will have the opportunity to comment on any problem areas that City of Detroit staff found during the visit, so that program staff have the opportunity to correct perceived deficiencies or noncompliance at the time of the visit.

Desk Monitoring

Desk monitoring can take place at any time during the year. The City of Detroit reserves the right to request materials that include but are not limited to: client files, program resources, policies and procedures, and financial back up materials as they wish.

The subrecipients will be required to submit materials to be reviewed remotely, the agency will need to submit the information to the City of Detroit electronically. It is the agency's responsibility to submit data in a secure, encrypted way or to agree with the City of Detroit on a mutually acceptable way to transmit the data that redacts all personal identifiable information.

After the On-Site or Desk Monitoring Visit

Within sixty (60) days of the date the subrecipient submits their materials, days, the City of Detroit will send a report summarizing the monitoring activities and any concerns or findings that need to be corrected.

This report will include one or more of the following:

- Concerns, which is a deficiency in program performance not based on a statutory, regulatory, or other program requirement. Monitoring concerns that are not addressed become a monitoring finding.
- Finding, deficiency in program performance based on material noncompliance with a statutory, regulatory, or program requirement for which sanctions or other corrective actions are authorized. No areas of concern or findings noted during the monitoring visit

If the letter outlines a concern or finding, it will also include a summary of the reason that the City of Detroit has classified the issue as a concern or finding, and how the agency or program can correct the finding. The City of Detroit will also establish a timeframe on when the corrective action should be completed by.

It is important to remember that until the agency can conclusively show that each concern or finding has been corrected, and that the City of Detroit has acknowledged this in writing, that each concern or finding will remain open. This may have implications for future applications for ESG funding.

Section 14: Appendices

Appendix I: Frequently Used Terms and Definitions

Americans with Disabilities Act (ADA) Compliance

The City of Detroit requires all ESG-funded shelters to comply with the [ADA regulations](#).

The ADA and Section 504 both stipulate that “no otherwise qualified person with disabilities shall, solely by reason of his or her disability, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance.” The Fair Housing Amendments Act regulations state “it shall be unlawful for any person to refuse to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford a person with a disability equal opportunity to use and enjoy a dwelling unit including public and private use areas.”

Continuum of Care

A Continuum of Care (CoC) is a regional or local planning body that coordinates housing and services funding for homeless families and individuals. The Detroit CoC oversees homeless services in Detroit, Highland Park, and Hamtramck.

Definitions of Homelessness

Category 1: Literally Homeless

An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings including a car, park, abandoned building, bus or train station, airport, or camping ground.

An individual or family living in a supervised publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, State, or local government programs for low-income individuals).

An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Category 2: Imminent Risk of Homelessness

An individual or family who will imminently lose their primary nighttime residence, provided that:

1. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance.

2. No subsequent residence has been identified
3. The individual or family lacks the resources or support networks, e.g., family, friends, faith-based, or other social networks, needed to obtain other permanent housing.

Category 3: Homeless Under Other Federal Statutes

Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

1. Are defined as homeless under section 387 of the Runaway and Homeless of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney- Vento Homeless Assistance Act (42 U.S.C.11434a)
2. Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance
3. Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance
4. Can be expected to continue in such status for an extended period of time because of chronic disabilities; chronic physical health or mental health conditions; substance addiction; histories of domestic violence or childhood abuse (including neglect); the presence of a child or youth with a disability; or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.

Category 4: Fleeing/Attempting to Flee Domestic Violence

Any individual or family who:

1. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
2. Has no other residence; and
3. Lacks the resources or support networks, e.g., family, friends, and faith-based or other social networks, to obtain other permanent housing. 24 CFR 578.3. Chronically Homeless McKinney-Vento Act.

Chronically Homeless

HEARTH/ McKinney Vento Act ([24 CFR 91.5](#) and [24 CFR 578.3](#)) defines Chronically Homeless as:

1. A homeless individual, who: Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and Has been homeless and living or residing in a place

not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least 12 months or on at least 4 separate occasions in the last 3 years where the combined occasions must total at least 12 months.

- a. "Occurrences" must be separated by a break of at least seven nights,
 - b. Stays in institution of fewer than 90 days do not constitute a break in homelessness; **AND**
 - c. Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 ([42 U.S.C. 15002](#))), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability; **OR**
2. An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; OR
 3. A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraphs (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

Developmental Disability

Developmental disability is defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 ([42 U.S.C.15002](#)) as:

1. A severe, chronic disability of an individual that— (i) Is attributable to a mental or physical impairment or combination of mental and physical impairments; (ii) Is manifested before the individual attains age 22; (iii) Is likely to continue indefinitely; (iv) Results in substantial functional limitations in three or more of the following areas of major life activity: (A) Selfcare; (B) Receptive and expressive language; (C) Learning; (D) Mobility; (E) Self-direction; (F) Capacity for independent living; (G) Economic self-sufficiency; and (v) Reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.
2. An individual from birth to age 9, inclusive, who has a substantial developmental delay or specific congenital or acquired condition, may be considered to have a developmental disability without meeting three or more of the criteria described in paragraphs (1) (i) through (v) of the definition of "developmental disability" in this section if the individual, without services and supports, has a high probability of meeting those criteria later in life. [24 CFR 583.5](#)

Disabling Condition

1. A condition that: (i) Is expected to be long-continuing or of indefinite duration; (ii) Substantially impedes the individual's ability to live independently; (iii) Could be improved by the provision of more suitable housing conditions; and (iv) Is a physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury;
2. A developmental disability, as defined in this section; or

3. The disease of acquired immunodeficiency syndrome (AIDS) or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome, including infection with the human immunodeficiency virus (HIV). [24 CFR 583.5](#)

Emergency Shelter

Any facility where the primary purpose is to provide a temporary shelter for the homeless in general or for specific populations of the homeless. Emergency shelters do not require occupants to sign leases or occupancy agreements. Emergency shelters are expected to have low barriers to project entry and participation, and to have a primary focus on moving clients to permanent housing solutions as quickly as possible.

Equal Access

Federal regulations that require that all HUD-funded services and housing shall be made available without regard to actual or perceived sexual orientation, gender identity, or marital status. No recipient or subrecipient of HUD funds may inquire about the sexual orientation or gender identity of an applicant for, or occupant of, HUD-assisted housing for the purpose of determining eligibility for the housing or otherwise making such housing available. This prohibition on inquiries regarding sexual orientation or gender identity does not prohibit any individual from voluntarily self-identifying sexual orientation or gender identity. This prohibition on inquiries does not prohibit lawful inquiries of an applicant or occupant's sex where the housing provided or to be provided to the individual is a temporary emergency shelter that involves the sharing of sleeping areas or bathrooms, nor does it prohibit inquiries made for the purpose of determining the number of bedrooms to which a household may be entitled. For additional information, please visit the HUD Exchange page on [Equal Access to Housing Final Rule](#).

Federal Fair Housing Act

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, as well as in other housing-related transactions based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and disability. For additional information, please see the HUD page on the [Fair Housing Act](#).

Fair Market Rent (FMR)

FMRs are gross rent estimates. The U.S. Department of Housing and Urban Development (HUD) annually estimates FMRs for 530 metropolitan areas and 2,045 nonmetropolitan county areas. HUD sets FMRs to assure that a sufficient supply of rental housing is available to program participants. By law, HUD is required to publish new FMRs at the start of each federal fiscal year on October 1.

Fair Market Rents are updated by HUD every year and can be found online at: <http://www.huduser.org/portal/datasets/fmr.htm>

Family/Household

HUD definition of family includes, but is not limited to, the following, regardless of actual or perceived sexual orientation, gender identity, or marital status:

1. A single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person; or
2. A group of persons residing together, and such group includes, but is not limited to: (i) A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family). [24 CFR 5.403](#)
3. Section 576.102(b) of the ESG interim rule prohibits ESG-funded programs from denying a family admission to an ESG-funded program or ESG-funded services based on the age of a child under the age of 18 if the program provides services to families with children.

Clarity on the Definition of Family

According to HUD, a family is simply one or more individuals who live together. Members of the family do not need to be related by blood, marriage, or in any other legal capacity.

Family members who are away from the household for a certain period of time may be considered part of the family. Live-in aides are also considered a family member. HUD's definition of family is broad to help make sure decent and affordable housing is available to every type of family.

Housing First

Housing First emerged as an alternative to the linear approach in which people experiencing homelessness were required to first participate in and graduate from short-term residential and treatment programs before obtaining permanent housing. In the linear approach, permanent housing was offered only after a person experiencing homelessness could demonstrate that they were "ready" for housing. By contrast, Housing First is premised on the following principles:

1. Homelessness is first and foremost a housing crisis and can be addressed through the provision of safe and affordable housing.
2. All people experiencing homelessness, regardless of their housing history and duration of homelessness, can achieve housing stability in permanent housing. Some may need very little support for a brief period of time while others may need more intensive and long-term supports.
3. Everyone is "housing ready." Sobriety, compliance in treatment, or even criminal histories are not necessary to succeed in housing. Rather, homelessness programs and housing providers must be "consumer ready."
4. Many people experience improvements in quality of life in the areas of health, mental health, substance use, and employment, as a result of achieving housing.
5. People experiencing homelessness have the right to self-determination and should be treated with dignity and respect.
6. The exact configuration of housing and services depends upon the needs and preferences of the population.

All program models funding through Homelessness Solutions must adhere to Housing First principles.

Homeless Management Information System (HMIS)

HMIS is the information system designated by the Continuum of Care to comply with HUD's data collection, management, and reporting standards. It is used to collect client-level data and data on the provision of housing and services to homeless individuals and families as well as persons at-risk of homelessness.

The Homeless Action Network of Detroit (HAND) serves as Detroit HMIS Lead Agency. More information about HMIS can be found on their website at <https://www.handetroit.org/hmis>

Low-Barrier

Low-barrier services and housing place a minimum number of expectations on people requesting assistance. The aim is to have as few barriers as possible to allow more people access to services. This model often means that program participants are not expected to abstain from using alcohol or other drugs, or from carrying on with street activities while engaging in services or living on-site, so long as they do not engage in these activities in common areas and are respectful of other tenants and staff. Low-barrier facilities follow a harm reduction philosophy.

Permanent Housing (PH)

Permanent housing has no length of stay limitation. Residents of permanent housing maintain legal protections under local, state, and federal laws through a lease agreement for a term of at least one year. After one year, the lease is eligible for renewal or termination as per the terms of the lease. Permanent Housing is community-based housing and may include market-rate housing, subsidized housing, permanent supportive housing, and Rapid Re-Housing.

Permanent Supportive Housing (PSH)

Permanent Supportive Housing is long-term housing with no defined limitation of participation. Residents of Permanent Supportive Housing sign lease agreements with the property owner or management and maintain full tenancy rights under local, state, and federal laws. In addition to permanent housing, PSH offers supportive services on a voluntary basis to assist formerly homeless persons in living independently and successfully maintaining the terms of their lease.

Rapid Re-Housing (RRH)

Rapid Re-Housing is an intervention, informed by a Housing First approach that is a critical part of a community's effective homeless crisis response system. Rapid Re-Housing rapidly connects families and individuals experiencing homelessness to permanent housing through a tailored package of assistance that may include the use of time-limited financial assistance and targeted supportive services. Rapid Re-Housing programs help families and individuals living on the streets or in emergency shelters solve the practical and immediate challenges to obtaining permanent housing while reducing the amount of time they experience homelessness. Rapid Re-Housing also helps families and individuals avoid a near-term

return to homelessness and links them to community resources that enable them to achieve housing stability in the long-term. Rapid Re-Housing is an important component of a community's response to homelessness. A fundamental goal of Rapid Re-Housing is to reduce the amount of time a person is homeless.

Details on the provision of supportive services that can be provided are set forth in [24 CFR 578.53](#). Tenant-based rental assistance provided through RRH can be short-term (up to 3 months) and/or medium-term (for 3 to 24 months), as set forth in [24 CFR 578.51\(c\)](#).

Rent Reasonableness

The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units.

In many areas, the easiest way to determine rent reasonableness is to use a housing database search engine that will compare units and rents against one another. One option is [Michigan Housing Locator](#). Other local resources (such as market surveys, classified ads, and information from real estate agents) may also be used to obtain information. When comparing rent reasonableness, the proposed unit must be compared to three other units.

For additional information on rent reasonableness under the Continuum of Care Program, please review this [HUD Exchange Resource](#).

Rent Reasonableness and Fair Market Rent (FMR)

Rental assistance may only be utilized on eligible housing units whose total rent does not exceed the fair market rent (FMR) established by HUD, as provided under 24 CFR § 982.503. The total rent for the eligible unit must also comply with HUD's standard of rent reasonableness, as established under 24 CFR § 982.507. These rent restrictions are intended to ensure that program participants can remain in their housing after their ESG assistance ends.

Rent reasonableness and FMR requirements are not applicable when an agency is only providing financial assistance or services under Housing Stabilization and Relocation Services. Such services include: rental application fees, security deposits, an initial payment of last month's rent, utility payments/deposits, moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, legal services, credit repair. Note that this guidance only applies to ESG homeless prevention and Rapid Rehousing. For guidance on CoC rules regarding FMR and rent reasonableness, please consult the [HUD Exchange Rapid Re-Housing: ESG vs CoC guide](#).

For more information about calculating rent reasonableness and FMR, please review the HUD Exchange resource [Rent Reasonableness and Fair Market Rent Under the Emergency Solutions Grants Program](#).

Subrecipient

Subrecipient refers to a private nonprofit organization, or unit of local government that receives a contract for CoC or ESG funds from a recipient to carry out a project. The term subrecipient replaces the terms “project sponsor” and “subgrantee.” Although the term subrecipient is used throughout this manual, in other context, MSDHA may refer to ESG subrecipients as “grantees.”

Transitional Housing (TH)

Transitional housing is community and/or program sponsored housing with a defined limitation of participation of up to 24 months. Residents of transitional housing sign a lease or occupancy agreement for a term of at least one month and may be offered supportive services to locate and secure permanent housing and to support a household’s ability to successfully maintain the terms of a lease agreement. Transitional Housing is designed to facilitate the movement of homeless individuals and families into permanent housing within 24 months. The program participation cannot be extended past the 24-month expiration. [24 CFR§ 578.3](#)

Victim Service Providers

Victim service providers are private nonprofit organizations whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women’s shelters, domestic violence transitional housing programs, and other programs. Victim Service Providers play an integral part in protecting vulnerable persons. As a result, HUD has created additional and alternative policies to protect both the personal information and personal safety of clients served by these agencies. For additional information on protecting persons seeking safety or HUD’s policies for victim service providers please review [HUD Notice PIH-2017-08 \(HA\), Violence Against Women Reauthorization Act of 2013 Guidance](#).

Appendix II: Grant Closeout and ESG Match Documentation

At the end of the grant term subrecipients will receive a Grant Closeout Certification. The Grant Closeout Certification must be filled out, signed, and include documentation of ESG match (if applicable).

City of Detroit Subrecipient Grant Closeout Certification

SUBRECIPIENT NAME:

CPA#

SPO#

FUNDED ACTIVITY:

CONTRACT TERM:

HUD FISCAL YEAR:

The Subrecipient hereby certifies that all financial, performance, and other reports as required by terms and conditions of the Federal award have been submitted and that: (1) the financial requirements as described in the City of Detroit contract have been performed in accordance with the terms and conditions of the executed agreement and applicable statutory and regulatory requirements and that there are no known outstanding programmatic or financial issues; and (2) all data provided below fairly reflect costs and sources of funds. In accordance with federal closeout requirements ([§ 200.344 Closeout.](#)) *“The federal awarding agency or pass-through entity will close out the Federal award when it determines that all applicable administrative actions and all required work of the federal award have been completed by the non-Federal entity.”*

City of Detroit HRD Program Manager to Complete:

Financial Information	ESG	CDBG	ESG-CV	CDBG-CV
Total Grant Amount Funded				
Total Approved Reimbursement Amount Submitted for Grant Year				
Balance of Grant funds Remaining				
Grant Funds Recaptured (if applicable)				

Data Requirements	
Cumulative Accomplishment and Performance Reports Data Submitted	

Recording Keeping and Match Requirements: Match must be expended on ESG-eligible activities. Matching sources may include cash contributions expended for allowable expenses and non-cash contributions including, but not limited to: the value of any real property, equipment, goods, or services committed to support ESG-eligible activities during the period of the ESG subrecipient agreement. (See the above Federal Requirements section for more information). For more information about the matching requirement, see [24 CFR 576.201](#). The City of Detroit and all subrecipients must keep records of the source of funds used to satisfy the ESG matching requirement. The records must indicate the fiscal year grant for which the matching contribution is being used. The records must also show how the value of noncash contributions was calculated. Note that, to the extent possible, the calculation for volunteer services must use the same methods that the organization uses to determine regular personnel costs. For more information about recordkeeping requirements, see [24 CFR 576.500](#).

Subrecipient to complete:

ESG Match Documentation	
Please Indicate the Amount of Match Required	\$49,926.85
Source of Funding Used for Match	
Supporting Documentation for Match Funding Attached <small>(Refer to Federal regulations for more details on the type of support required)</small>	

As indicated in the City of Detroit ESG Manual (Appendix A), prior to the release of the last payment of the grant award ESG subrecipients must demonstrate they have met their match requirement. By signing below, you acknowledge that your organization met the required 100% match for ESG funding, and you attest that all applicable administrative actions and all required work of the federal award have been completed and that all the information listed in this document is accurate and final.

Print: _____ **Signed:** _____ **Date:** _____
Subrecipient's Authorized Representative

Print: _____ **Signed:** _____ **Date:** _____
Reviewed and Approved by COD Program Manager

Appendix III: Documenting Income for RRH and Prevention

The table below outlines sources of income and how they need to be documented in accordance with [24 CFR 5.609](#).

Rapid Re-Housing providers are not required to verify income at intake but must verify income during the annual recertification.

Prevention providers verify income at intake and every 3 months.

Documentation Options by Income Types				
Income Source	Include in Income Calculation?	Third-Party Verification	Oral Verification	Self-Declaration
No Income Reported	Yes	Copy of Social Security Statement obtained through http://www.socialsecurity.gov/mystatement/ AND Signed Declaration of No Income	N/A	Client completes Self Declaration of No Income
Wages and Salary	Yes GROSS Pay (Not Net Pay)	Copy of Recent Paystubs OR Signed Letter from Employer (including gross pay amount, frequency, average hours, and contact information)	Staff contacts employer and completes Oral Verification of Income	Client completes Self Declaration of Income
Self- Employment/ Business Income	Yes NET Income (Not Gross Pay)	Copy of most recent federal or state tax return showing net business income	N/A	Client completes Self Declaration of Income
Interest and Dividend Income	Yes GROSS Pay (Not Net Pay)	Copy of most recent interest or dividend income statement OR Copy of most recent federal or state tax return showing interest, dividend, or other net income	N/A	Client completes Self Declaration of Income
Pension/ Retirement Income	Yes GROSS Pay (Not Net Pay)	Copy of most recent payment statement or benefit notice from Social Security Administration (SSA), pension provider, or another source	Staff contacts provider and completes Oral Verification of Income	Client completes Self Declaration of Income

Unemployment Income	Yes GROSS Pay (Not Net Pay)	Copy of most recent unemployment or severance payment statement notice	Staff contacts provider and completes Oral Verification of Income	Client completes Self Declaration of Income
Disability Income	Yes GROSS Pay (Not Net Pay)	Copy of most recent worker's compensation, SSI, or SSDI payment	Staff contacts provider and completes Oral Verification of Income	Client completes Self Declaration of Income
Temporary Assistance for Needy Families (TANF) or other	Yes GROSS Pay (Not Net Pay)	Copy of most recent payment statement or benefit notice	Staff Contacts Provider and completes Oral Verification of Income	Client completes Self Declaration of Income

The following table describes the types of income that are not counted when calculating gross income for purposes of determining ESG eligibility and documentation.

Income Exclusions by Income Types	
General Category	Description
1. Income of Children	Income from employment of children (including foster children) under the age of 18 years.
2. Inheritance and Insurance Income	Lump-sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains and settlement for personal or property losses (except as provided in Pension/Retirement Income).
3. Medical Expense Reimbursements	Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member.
4. Income of Live-in Aides	Income of a live-in aide (as defined in 24 CFR 5.403).
5. Disabled Persons (only in HOME Properties)	Certain increases in income of a disabled member of qualified families residing in HOME-assisted housing or receiving HOME tenant-based rental assistance (24 CFR 5.617).

6. Student Financial Aid	The full amount of student financial assistance paid directly to the student or to the educational institution.
7. Armed Forces Hostile Fire Pay	The special pay to a family member serving in the Armed Forces who is exposed to hostile fire.
8. Self-Sufficiency Program Income	a. Amounts received under training programs funded by HUD.
	b. Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS).
	c. Amounts received by a participant in other publicly assisted programs that are specifically for, or in reimbursement of, out-of-pocket expenses incurred (special equipment, clothing, transportation, childcare, etc.) and which are made solely to allow participation in a specific program.
	d. Amounts received under a resident service stipend. A resident service stipend is a modest amount (not to exceed \$200 per month) received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to: fire patrol, hall monitoring, lawn maintenance, resident initiatives coordination, and serving as a member of the PHA's governing board. No resident may receive more than one such stipend during the same period of time.
	e. Incremental earnings and benefits received by any family member for participation in qualifying state or local employment training programs (including training not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives and are excluded only for the period during which the family member participates in the employment training program.
9. Other Non-recurring Income	Temporary, nonrecurring, or sporadic income (including gifts). Sporadic wages or employment income should be included in the income calculation.
10. Reparations	Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era.
11. Income from Full-time Students	Annual earnings in excess of \$480 for each full-time student 18 years old or older (excluding the head of household or spouse).
12. Adoption Assistance	Adoption assistance payments in excess of \$480 annually per adopted child.

13. Deferred/Lump Sum Social Security & SSI Income	Deferred periodic amounts from SSI and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts.
14. Income Tax and Property Tax Refunds	Amounts received by the family in the form of refunds or rebates under state or local law for property taxes paid on the dwelling unit.
15. Home Care Assistance	Amounts paid by a state agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep this developmentally disabled family member at home.

Documentation of Lack of Resources at Recertification

When providing Rapid Re-Housing assistance, subrecipients must demonstrate that the program participant does not have sufficient resources or support networks (e.g., family, friends, faith-based, or other social networks) immediately available to prevent them from moving to an emergency shelter or an unsheltered destination. Acceptable documentation generally includes:

- Notice of termination from employment
- Unemployment compensation statement
- Bank statement
- Health-care bill showing arrears
- Utility bill showing arrears
- Other third-party documentation illustrating lack of resources
- Written statement by the relevant third party (e.g., former employer, public administrator, relative)
- Written statement of program staff of phone call or other verbal communication with relevant third-party source (if written documentation is unavailable)

Appendix IV: Rental Unit Inspection Requirements

Overview

Subrecipients cannot use ESG funds to help a program participant remain in or move into housing that does not meet the minimum habitability standards under §576.403(c). This restriction applies to all activities under the Homelessness Prevention and Rapid Re-Housing components.

The Detroit CoC has also established more stringent standards and requires all Rapid Rehousing units to pass Housing Quality Standards (HWS) inspections. This helps ensure that units meet requirements of the HCV program, should a participant lease-up with an HCV voucher.

It is important to note that while in most respects, HQS is more stringent and detailed than the ESG minimum standards, the ESG standards for fire safety are more specific. Agencies must notify inspectors of these requirements, amend their HQS inspection checklists, and ensure all units meet the more stringent inspection for fire safety.

ESG Habitability Standards

Habitability inspections must be conducted by a qualified ESG recipient or subrecipient staff or contractor. Program participants may not conduct inspections.

In addition:

- If an eligible household needs homelessness prevention assistance to remain in its existing unit, the assistance can only be provided if that unit meets the minimum standards.
- If an eligible household needs homelessness prevention or Rapid Re-Housing assistance to move to a new unit, the assistance can only be provided if the new unit meets the minimum standards.
- Minimum standards must be met even if **one-time** assistance is provided (e.g., rental arrears, security deposit, etc.).
- The subrecipient must be sure to document compliance with the ESG habitability standards in the program participant's file.

ESG habitability standards cover 10 areas of review to ensure that the housing is minimally habitable. These 10 areas are:

- **Structure and materials** – The structures must be structurally sound to protect residents from the elements and not pose any threat to the health and safety of the residents.
- **Space and security** – Each resident must be provided adequate space and security for themselves and their belongings, and an acceptable place to sleep.
- **Interior air quality** – Each room or space must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.
- **Water supply** – The water supply must be free from contamination.

- **Sanitary facilities** – Residents must have access to sufficient sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.
- **Thermal environment** – The housing must have any necessary heating/cooling facilities in proper operating condition.
- **Illumination and electricity** – The structure must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the structure.
- **Food preparation** – All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.
- **Sanitary conditions** – The housing must be maintained in a sanitary condition.
- **Fire safety** – There must be a second means of exiting the building in the event of fire or other emergency. Each unit must include at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit. Smoke detectors must be located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is occupied by hearing impaired persons, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person. The public areas of all housing must be equipped with a sufficient number, but not less than one for each area, of battery-operated or hard-wired smoke detectors. Public areas include, but are not limited to, laundry rooms, community rooms, day care centers, hallways, stairwells, and other common areas.

A checklist tool for ensuring that emergency shelter and permanent housing standards are met can be found here: [https://www.hudexchange.info/resources/documents/ESG- Emergency-Shelter-and-Permanent-Housing-Standards-Checklists.docx](https://www.hudexchange.info/resources/documents/ESG-Emergency-Shelter-and-Permanent-Housing-Standards-Checklists.docx)

Further details on ESG Minimum Habitability Standards, as well as a comparison of ESG Minimum Standards and HQS, may be found here:

<https://files.hudexchange.info/resources/documents/ESG-Emergency-Shelter-and-Permanent-Housing-Standards.pdf>

Housing Quality Standards and NSPIRE

The [National Standards for the Physical Inspection of Real Estate \(NSPIRE\)](#) is a new physical inspection protocol that has become the primary method for HUD physical inspections and will replace HQS inspection requirements for Rapid Rehousing Providers, projected October 2025

HUD's stated purpose in developing and implementing a new inspection protocol is to move its inspections to a system that prioritizes health, safety, and functional defects over appearance to produce inspection results that better reflect the true physical condition of a property. In practice, this approach means a move away from Housing Quality Standards (HQS) and Uniform Physical Condition Standards (UPCS) systems that often resulted in uneven application of standards across the country and could encourage quick fixes that did not always meet industry standards.

All Rapid Rehousing providers will be required to use the new NSPIRE inspection protocol per HUD's announced date of compliance for HCV and PBV programs, projected October 2025.

More information on NSPIRE can be found here:

https://www.hud.gov/program_offices/public_indian_housing/react/nspire

Appendix V: Lead-Based Paint Requirements

If a building or unit was built before 1978, there is a possibility it has lead-based paint. In 1978 the federal government banned consumer uses of lead-containing paint, but some states banned it even earlier. Lead from paint, including lead-contaminated dust, is one of the most common causes of lead poisoning.

Organizations that receive funds for Homelessness Prevention or Rapid Rehousing **MUST** comply with the Lead- Based Paint Poisoning Prevention Act (42 U.S.C. 4821–4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851–4856), and they must implement regulations in [24 CFR part 35](#), subparts A, B, H, J, K, M, and R.

ESG regulations state that a lead-based paint visual assessment must be completed for all units that meet the three following conditions:

- The household living in the unit is being assisted with ESG financial assistance (rent assistance, utilities assistance, utility/security deposits, or arrears).
- The unit was constructed prior to 1978.
- A child under the age of six or a woman who could become pregnant is or may be living in the unit.

These regulations apply regardless of whether a household is staying in an existing unit or moving to a new unit and they must be complied with prior to providing ESG assistance. They must also be complied with (and assessments completed) annually thereafter.

ESG subrecipients are responsible for ensuring that property owners and managers meet the lead-based paint requirements. It may be helpful for subrecipients to think about the requirements in two categories, outlined below.

- **Disclosure Requirements** - Disclosure requirements are triggered for ALL properties constructed prior to 1978. These requirements require that lessors (property owners or managers) provide tenants with:
- [Disclosure form for rental properties disclosing the presence of known and unknown lead-based paint](#)

AND

- A copy of the [“Protect Your Family from Lead in the Home” pamphlet](#)

This requirement actually relates to property owners/managers but sharing this information with program participants (or ensuring they have received it) is an easy thing to do and is recommended for ESG subrecipients.

The Visual Assessment - Staff may become a HUD-Certified Visual Assessor by successfully completing a [20-minute online training](#) through HUD’s website. Depending on the results of the visual assessment, additional steps may be required before assistance can be provided for that unit. Visual assessments are not triggered under the following circumstances:

- It is a zero-bedroom or SRO-sized unit.
- X-ray or laboratory testing of all painted surfaces by certified personnel has been conducted in accordance with HUD regulations and the unit is officially certified to not contain lead-based paint.
- The property has had all lead-based paint identified and removed in accordance with HUD regulations.
- The client is receiving federal assistance from another program, where the unit has already undergone a visual assessment within the past 12 months (e.g., if the client has a Section 8 voucher and is receiving ESG assistance for a security deposit or arrears). NOTE: In such cases, ESG staff are required to obtain documentation that a visual assessment has been conducted by the agency administering the other assistance. This documentation should be added to the ESG case file.
- It meets any of the other exemptions described in [24 CFR Part 35.115\(a\)](#).

If any of the conditions outlined above are met, a staff member simply needs to document the condition and place a copy in the participant's case file.

If a visual assessment reveals problems with paint surfaces, program staff cannot approve the unit for assistance until the deteriorating paint has been repaired. At this point, program staff must make a decision: 1) work with the property owner/manager to complete needed paint stabilization activities and clearance, 2) work with the household to locate a different (lead- safe) unit, or 3) refer the client to a different program if ESG assistance cannot be provided.

Appendix VI: Severe Weather Policy

Overview

The Detroit Continuum of Care Severe Weather Policy is a protocol to engage, transport, and shelter people experiencing unsheltered homelessness in the city of Detroit, Hamtramck, Highland Park who might otherwise remain outdoors during periods of severe weather. Remaining outdoors during severe weather conditions can lead to serious and life-threatening conditions and require the Homelessness Response System to respond accordingly.

This policy outlines the minimum requirements for the emergency response providers, which include outreach, shelter, and warming center providers. The Continuum of Care (CoC) and the City of Detroit acknowledge that severe weather conditions can be challenging for all, including unsheltered individuals, current shelter clients, and providers.

Severe weather is broken down into two categories- Code Blue for severe cold weather and Code Red for severe hot weather. All categories are defined below and were informed by the NOAA. These situations allow clients to remain indoors during the day and prohibits terminations from emergency shelter during severe weather to ensure the safety of all.

The dedication of and implementation of this protocol by shelter, warming center, and outreach providers is crucial to keeping people safe and alive during these times. Any questions can be directed to the City of Detroit's Homelessness Manager.

Definitions

Emergency Response Provider- Shelter, outreach, and warming center providers funded through state or federal grants.

Community Provider- The network of organizations that provide services, formally or informally to individuals experiencing homelessness who do not receive federal funds for this purpose.

Emergency Operations Center: Physical location at which the coordination of information and resources to support incident management (on-scene operations) activities normally takes place.

Emergency Support Functions: Emergency Support Functions (ESF) serve as grouping mechanisms for governmental and private sector support functions. ESFs organize emergency response efforts through a unified command structure to improve efficiency and maximize resources.

Code Blue (Excessive Cold Temperatures)

- The temperature drops to **20 degrees Fahrenheit or below**, including the National Weather Service for wind chill values for two hours or more: and/or
- **Ice storms** or **freezing rain** is expected; and/or
- 6 or more inches of **snow** is expected

Code Red (Excessive Heat Temperatures)

- A heat index of **105 degrees** Fahrenheit is predicted for two hours or more by the National Weather Service.

City of Detroit Responsibilities

The City of Detroit has accepted responsibility for confirming that providers are aware of severe weather situations and that each entity takes appropriate action per this policy. During episodes of severe weather, the City of Detroit will notify providers via email that the severe weather policy is in effect. Notification will be provided in three parts via email:

1. First, the City will issue a warning notification stating that severe weather is expected in 2-3 days.
2. Second, the City will notify providers when the severe weather policy is in effect.
3. Finally, the City will email providers when the severe weather declaration is lifted.

When appropriate, additional cooling centers and/or non-traditional warming centers (e.g. churches) operated by community providers will be sent via email to all system partners. The notification will include the address, phone number, and contact persons for each location to ensure effective coordination.

At the City of Detroit's discretion, additional outreach efforts and/or emergency shelter beds may be mobilized. In this circumstance, the City of Detroit will ensure that the greater community receives notification of the weather emergency, shelter locations, and who to contact to engage with outreach services.

Emergency Response Provider Responsibilities

Emergency response providers play a crucial role in keeping people safe during severe weather. To ensure appropriate mobilization, each provider must designate a contact person who will notify staff at their respective programs of the declaration of severe weather and ensure implementation of this policy. If this contact person changes, it is the agency's responsibility to notify the City of Detroit's Homelessness Solutions Manager of this change immediately. The expectations of each sector of emergency response providers are outlined below.

Emergency Shelter Providers

- Curfews must be lifted to ensure that households can access emergency shelter throughout the night.
- During severe weather shelters must not exit individuals, either voluntarily or involuntarily, out of shelter. The agency is required to keep the household until after the severe weather has passed. If a household wants to leave shelter, staff must ensure that the household has transportation and a safe place to stay for the night. This can be accomplished by providing bus tickets, making sure the household can call family/friends or transportation services, or providing direct transportation.

- No shelter suspensions or bans can be carried out during severe weather – clients who have been banned can return to the shelter for the night in question, if necessary. This would most likely occur if a client presented at shelter during the weekend or after CAM business hours. Clients can be referred to CAM the following day after the City of Detroit has sent confirmation that the severe weather situation has concluded. If a client becomes physically violent, staff are encouraged to call the police.
- If a shelter does not have space during severe weather, the agency must either a) let the household remain at the shelter, utilizing an or another arrangement for overnight accommodations; or b) secure another shelter bed and arrange for transportation to that shelter.
- Other options could include the lobby, dining hall, or community room.

Warming Center Providers

Warming Centers provide vital shelter space during the winter months, mid-November through March. Warming Centers must adhere to the same responsibilities as Emergency Shelter (as listed above). Anyone in need of a shelter bed can walk into a warming center without undergoing a complete HMIS intake for the night in question. If the household wishes to stay in the warming center for additional nights staff can complete at intake at that time.

Outreach Providers

- Between November and March, outreach providers are required to establish and share a calendar to provide after-hours coverage seven nights a week.
- Navigation-Only teams will be expected to support Street Outreach efforts during Severe Weather.
- Providers must make contact with all unsheltered individuals on their caseload and/or other individuals that they are aware of to ensure their safety and bring them into shelter.
- Providers must coordinate with each other regarding unsheltered individuals who are refusing shelter in order to provide continuous engagement and ensure their safety.
- Outreach providers may be called to work additional shifts or during days or times outside their normal work schedule in order to provide the most coverage possible. To prepare for this, providers are encouraged to build in additional funds for salary or to make budget modifications if necessary.

Appendix VII: ESG Minimum Habitability Standards

The Emergency Solutions Grants (ESG) Program interim rule, at 24 CFR 576.403, establishes minimum standards for safety, sanitation, and privacy in emergency shelters and warming centers that are ESG funded.

Note: This document does not describe how to conduct an inspection, as City of Detroit staff will conduct the inspections. Nor does it address the lead-based paint requirements, which can be found at 24 CFR part 35.

Minimum Standards for Emergency Shelters

Whenever ESG funds are used under the Emergency Shelter component for renovation or shelter operations, the building must meet the minimum standards for safety, sanitation, and privacy provided in §576.403(b), also listed in Appendix A. If cash or non-cash contributions (e.g. funds or staff time) used for renovation or shelter operations are to be contributed to the recipient's ESG program as match, the emergency shelter must meet the minimum standards, because all matching contributions must meet all requirements that apply to the ESG funds provided by HUD (§576.201(c)).

Note: The same standards apply regardless of the amount of ESG funds involved. For example, a shelter that receives \$1,000 in ESG funds to replace a water heater is subject to the same standards as a shelter that receives \$80,000 for operating costs.

The recipient or subrecipient must be sure to maintain documentation of compliance with the minimum standards for Emergency Shelter activities in the program's records.

Renovation

Any building for which ESG funds are used for conversion, major rehabilitation, or other renovation must meet:

- The minimum safety, sanitation, and privacy standards under §576.403(b); **and**
- State or local government safety and sanitation standards, as applicable. In addition:
- If the recipient established any other standards that add to or exceed HUD's minimum standards, the recipient/subrecipient must ensure that the shelter meets these standards.
- An inspection to ensure that the building meets all of the minimum standards must be completed when the renovation is complete and before the shelter is occupied.
- The shelter should follow the minimum standards for as long as the minimum period of use requirement is in place for the facility (10 years for major rehabilitation and conversion, or 3 years for other renovation)
- The recipient should be involved in planning the renovation up front to ensure that the renovation work will result in the shelter meeting the minimum standards.

Shelter Operations

Any emergency shelter that receives ESG funds for shelter operations (including minor repairs) must meet the minimum safety, sanitation, and privacy standards under §576.403(b).

In addition:

- If the recipient established any other standards that add to or exceed HUD's minimum standards, the recipient/subrecipient must ensure that the shelter meets these standards.
- The shelter must be inspected on-site to ensure that it meets the minimum standards before ESG funds are provided for shelter operations.
- The shelter must meet all standards for the entire period during which ESG funds are provided for operating the emergency shelter. For example, if operating assistance is provided for 24 months, the shelter must remain in compliance with the minimum standards for those 24 months.
- If the shelter fails to meet the minimum standards, ESG funds (under either shelter operations or renovation) may be used to bring it up to the minimum standards.
- If the shelter continues to receive ESG shelter operating funds over a period of time, then a periodic, on-site inspection must be conducted each time the shelter receives funds. For example, if the shelter receives an annual allocation of funds from the ESG recipient, an inspection must be conducted annually.
- If the recipient/subrecipient moves the shelter to a new site or structure, that new site or structure must meet all emergency shelter standards for the remaining period that ESG funds are used for operating expenses.

See link below for the ESG Minimum Habitability Standards for Emergency Shelters Tool:

<https://www.hudexchange.info/resource/3766/esg-minimum-habitability-standards-for-emergency-shelters-and-permanent-housing/>

Minimum Standards Do Not Apply to Essential Services and HMIS Activities

- The minimum standards for emergency shelters only apply when ESG funds are used for **shelter operations, conversion, major rehabilitation, or other renovations**.
- **Essential services** provided under the Street Outreach and Emergency Shelter components do not trigger either the minimum standards for emergency shelter or the minimum standards for permanent housing. This is because there is no unit to inspect; these services are provided for persons who are sleeping in emergency shelters or with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground.
- Likewise, the minimum standards do not apply to an emergency shelter (or other organization) receiving ESG funds only for **HMIS** costs.

Appendix VIII: Prevention Screening Tool

The Detroit Homelessness Prevention Tool is designed to help staff with the following functions:

1. Verify household eligibility for homelessness prevention
 - a. Imminent risk of literal homelessness (within 14 days)
 - b. Very-low income status (under 50% AMI ESG-CV only; 30% AMI ESG)
2. Identify and prioritize the most vulnerable households most likely to be literally homeless if they do not receive prevention assistance

Part 1: Eligibility	
A. Household is at imminent risk of literal homelessness. Without prevention assistance, household is likely to be literally homeless within the next 14 days.	
B. Household is very-low income (below 50%/30% AMI)	
	Check
Housing Status	
Identify the primary place where the client is staying:	
<i>Can you tell me about the place you stayed last night? Is this the primary place you stay, or is there somewhere else you normally stay? (Check 1 below)</i>	
Hotel or motel paid for without emergency shelter voucher	
Staying or living in a family member's room, apartment or house	
Staying or living in a friend's room, apartment or house	
Rental by client, no ongoing housing subsidy	
Rental by client, with other ongoing housing subsidy	
Permanent housing for formerly homeless persons (e.g., CoC Program funded unit)	
Owned by client, no ongoing housing subsidy	
Owned by client, with ongoing housing subsidy	
Hospital or other residential non-psychiatric medical facility	
Long-term care facility or nursing home	
Jail or prison	
Residential project or halfway house with no homeless criteria	
Psychiatric hospital or other psychiatric facility	
Substance abuse treatment facility or detox center	

Other (describe):	
Do you have to leave this place (or the place you normally stay) within 14 days?*	
<i>**IF NO, STOP HERE: Client is <u>not</u> eligible for prevention resources</i>	
Identify why the client must leave the primary place they are staying:	
<i>What's causing you to have to leave? (Check 1 below):</i>	
Court-ordered judgement to vacate rental unit*	
<i>**IF YES, STOP HERE: See Eviction Prevention Tool</i>	
Written or verbal notice from family, friend or host to leave doubled-up housing	
Exiting an institution or system of care (e.g., hospital, jail, treatment facility, etc.)	
Insufficient resources to continue to pay for hotel or motel	
Other (describe):	
Income Status	
Household size:	
A. Total annual gross income (from all sources):	
B. 30%/50% of Area Median Income for household size:	
Is total annual gross income (A) less than 30/50% of area median income (B)?	
<i>**IF NO, STOP HERE: Client is <u>not</u> eligible for prevention resources</i>	

Part 2: Targeting		
Use the following questions to determine household prioritization for resources:		
	Check	Points
Urgency of Housing Situation		
Current housing loss expected in: (check 1 below)		
• 0-6 days		5

• 7-14 days		4
Vulnerabilities & Housing Barriers		
Income		
Have you experienced a sudden & significant loss of income (50% or more) (including employment and cash benefits) within the last 60 days AND/OR Uncontrollable & significant increase in non-discretionary expenses (ie rent, medical expenses, etc.) in the last 60 days due to COVID-19?		3
Household Annual Gross Income Amount: (check 1 below)		
• No income (ie unemployed, no cash benefits)		5
• 1-14% of AMI for family size		4
• 15-30% of AMI for family size		3
• 31-40% of AMI for family size		2
• 41-50% of AMI for family size		1
Household demographics		
Major change in household composition (ie death of family member, divorce by head of household, new child) in the last 6 months that directly affects ability to secure or maintain housing		3
Senior over the age of 55		3
Household size of 5 persons or larger		3
Household member is pregnant		3
At least 1 dependent child under 6		3
Single parent		3
Any household member has a disability that severely impedes the ability to maintain housing independently		2
Criminal History		
Household member was recently (within the last 6 months) discharged from an institution (jail, hospital, etc.)		4
Criminal record for arson, drug dealing or manufacture, felony offense against persons or property		4
Registered sex offender		5
Census Tract		

Resides in a prioritized census tract		5
Housing History		
Head of Household has been homeless one or more times in the last 3 years		3
Prior rental evictions (in the last 3 years): (check 1 below)		
• 4 or more rental evictions		5
• 2-3 rental evictions		4
• 1 rental eviction		3
How many times have you moved (not related to evictions) in the last year: (check 1 below)		
• 4 or more moves		5
• 2-3 moves		4
• 1 move		3

Score Range	Eligibility
0-15	Light Touch - Resources only <i>Non-monetary assistance, including referrals to Detroit at Work, Wayne Metro.</i>
16-35	One-Time Assistance <i>“Prevention” assistance: one month rent, security deposit, utility payment, moving costs, rental / utility arrears</i>
36+	Short-term assistance <i>“Longer-term prevention” Rental assistance not to exceed 3 months</i>

Appendix IX: Detroit CoC Emergency Shelter Community Standards

The City of Detroit’s Homelessness Solutions (HS) team, with the support of our ESP partners is committed to improving our homeless system by ensuring it is designed to benefit and help individuals and families in need. To accomplish this, the HS team has worked alongside the shelter providers within our community over this past year to develop community standards. We wish to continue to improve our system’s *low-barrier* approach and ensuring person-centered services and evidence-based practices are in place to increase positive client outcomes to permanent housing.

This is an effort to reduce barriers and overly restrictive rules, while still maintaining structure, to allow clients to receive the most supportive and consistent services possible. These community standards will also help to create a more consistent and standardized approach from **all** shelters in our CoC.

The Community Standards established in 2023 will go into **effect January 2024**. At this time, we ask that your agency ensures training and communication is provided to all staff and clients to easily adapt to this upcoming system change. In addition, please ensure to update your policies and procedures to reflect the changes in the Community Standards.

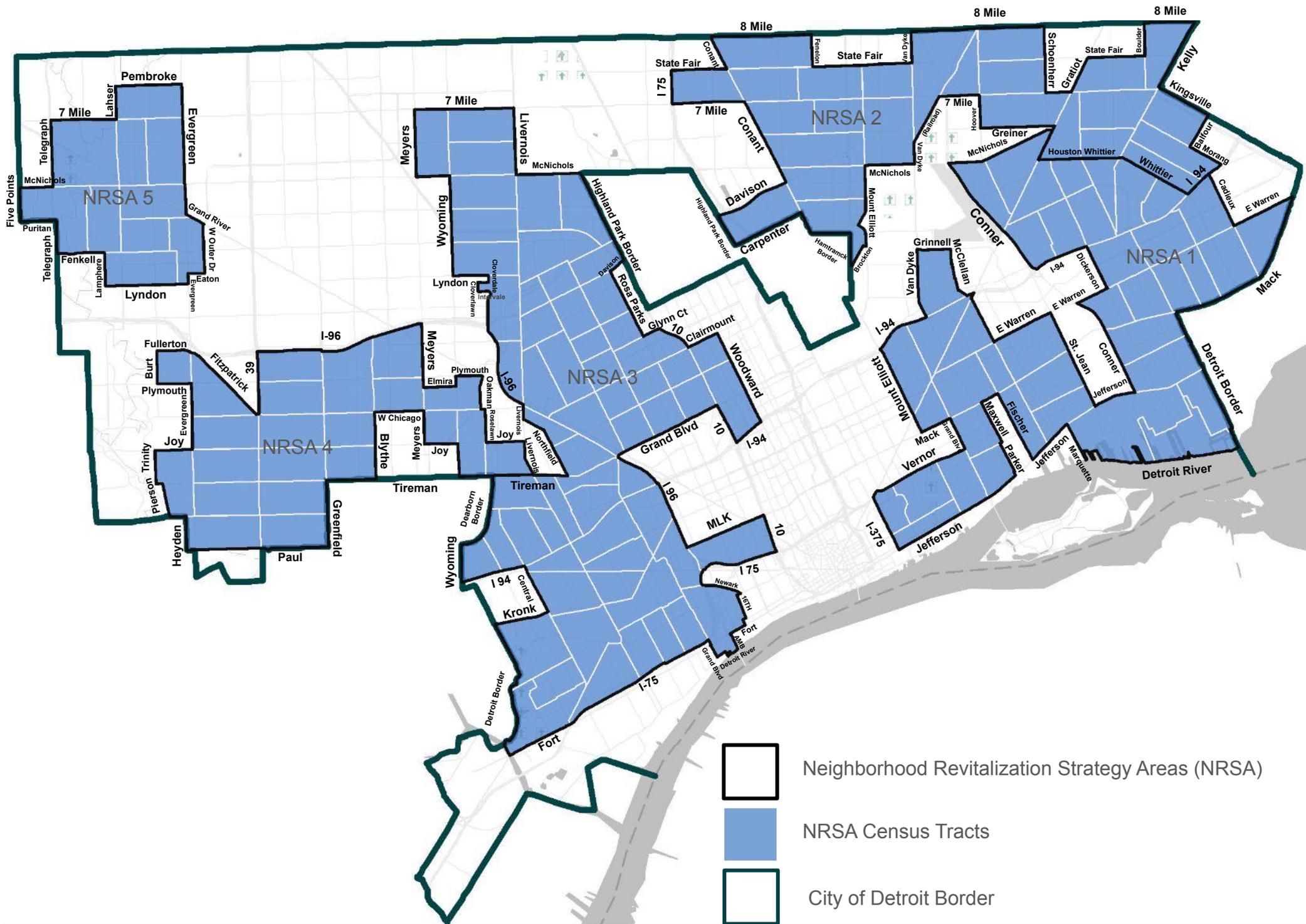
We appreciate your continued effort and look forward to supporting you on this effort.

For any questions, concerns, or general feedback, feel free to contact your City of Detroit Contract Manager or Emergency Shelter specialist.

Community Standards	
Topic	Standard
1. Curfews	Curfew can be no earlier than 9pm on weekdays and no earlier than 11pm on weekends. Clients are expected to be in the shelter no later than the established time, with exceptions to work schedules, prior notice from appointed staff and/or emergency situations, and after-hours/walk-ins clients.
2. Bed Holding/Permissions for Overnight Stays	Shelter beds will be held for a period of one night of a person’s absence from the shelter. Flexibility with clients given certain circumstances requires pre-approval. All shelters should have a clear process for holding beds in the case of extenuating circumstances. Additionally, the staff member should document this in a HMIS case note.
3. Client Work Schedules	To eliminate any issues of not being able to meet curfew and being denied entry, client’s employment status should be established at intake or when employment is gained. Shelters should not require clients to provide documentation to prove their employment; Self-declaration of employment will suffice as appropriate documentation. However, if the client

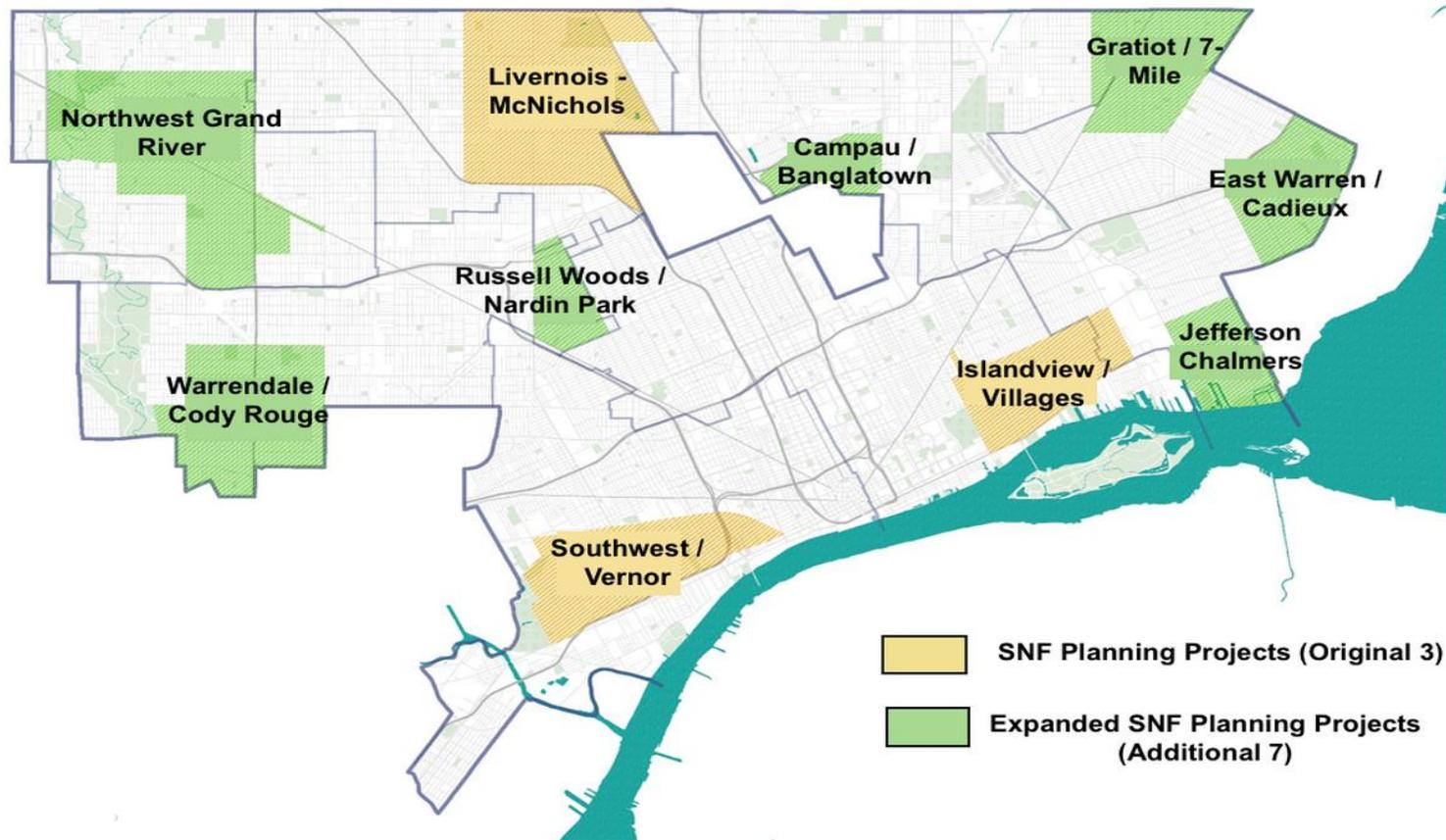
	works past shelter curfew, then additional information <i>can</i> be requested.
4. Daytime Access for Clients	Provisions and exceptions, for daytime access should be provided, dependent on client situation; exceptions need to be made for clients who are sick, employed on alternative shifts, non-school aged children and their mothers, and seniors.
5. Service Animals	The City of Detroit requires all ESG-funded shelters to comply with Americans with Disabilities Act (ADA) and to ensure provisions for services are made for those who have a service animal.
6. Bans/Suspensions	Involuntary exits (i.e. bans) should be limited to extreme cases, such as physical violence or the use of a weapon. Bans have to be entered in HMIS within 24 hours and cannot last longer than 6-months. Clients will be allowed to re-enter shelter after the ban expires.
7. Personal Items	Entering shelter with personal items need to be as low-barrier as possible (will look different depending on each shelter's space availability). As part of client's discharge/termination, if needed, shelters should hold client's personal items for 7 business days after the client has exited.
8. Overflow Protocols	If the shelter accepts walk-in/overflow, that client should be entered in HMIS and connected with CAM the next business day; CAM will assist with connecting client with navigation services and potential shelter placement, when available.

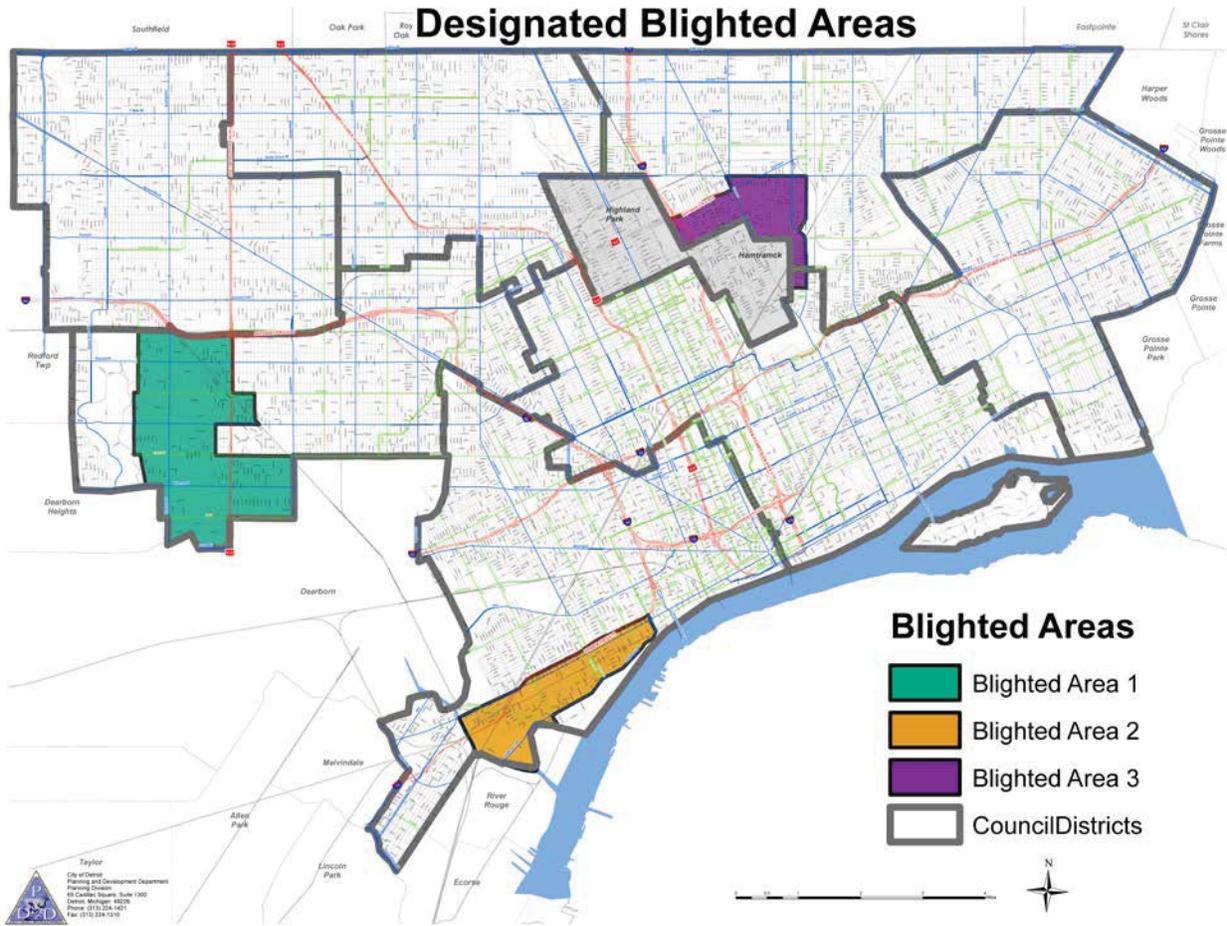
MAPS



City of Detroit – Master Plan of Policies

10 Neighborhood Clusters targeted through the Strategic Neighborhood Fund (SNF)





Designated Blight Areas Map