



PFR Underwriting Policies and Procedures Manual

CDBG-DR

City of Detroit

Housing & Revitalization Department

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Table of Contents

Section 1: Program Overview 3

 1.1 Purpose 3

 1.2 Scope 4

 1.3 Roles and Responsibilities 4

 1.4 Eligible Activities 4

Section 2: PFR Funding Requirements 5

 2.1 Meeting a National Objective 5

 2.2 Eligible Activities under the CDBG-DR 6

 2.3 Ineligible Activities 7

 2.4 Disaster Tie-Back 7

 2.5 Mitigation Set-Aside 7

 2.6 Duplication of Benefits 9

 2.7 Minimum and Maximum Awards 10

 2.8 Timely Expenditure of Funds 10

 2.9 Reporting 10

 2.10 PFR Activities and the Disaster Recovery Action Plans 11

 2.11 Cross-Cutting Federal Regulations 11

 2.12 Environmental Review 11

 2.13 Flood Insurance Requirements 12

 2.14 Flood Insurance Standard 12

Section 3: NOFA and Award Process 12

 3.1 PFR NOFA and Award 12

 3.2 Identifying the National Objective 13

Section 4: Project Management 15

 4.1 Project Steps 15

 4.2 Project Closeout 18

Section 5: Internal Controls 19

 5.1 Project Closeout Checklist and Document Retention 19

 5.2 Subrecipient Monitoring 19

 5.3 Record Retention & Recordkeeping Policies 20

 5.4 Financial Management 20

 5.5 Cost Principles 21

5.6 Program Income..... 21

Section 6. General Policies..... 22

6.1 Cross-Cutting Federal Regulations 22

6.2 Waiver of Policy/Policy Exceptions 22

Section 7. Appendix 23

7.1 Update Summary 23

7.2 Distribution & Training Plan 24

7.3 PFR Award Memo 25

7.2 Sample NOFA 27

7.3 Exhibit D Cross Cutting Regulations 52

7.4 Project File Checklist 66

7.5 Monitoring Checklist 68

7.6 Sample Reporting Requirements 71

7.8 CDBG-DR Duplication of Benefit Certification Form 72

HRD reserves the right to amend, without notice, these policies & procedures as circumstances and experience dictate.

Section 1: Program Overview

1.1 Purpose

The U.S. Department of Housing and Urban Development (HUD) has allocated the City of Detroit, through its Housing and Revitalization Department (HRD), Community Development Block Grant – Disaster Recovery (CDBG-DR) funding to support long-term recovery efforts following storm events from the 2021 and 2023 Presidential Major Disaster Declarations. To continue participation in the program, the City contractually agrees to implement the program in accordance with the Housing and Community Development Act of 1974, the related CDBG program regulations in 24 CFR 570, the universal notices for the respective Disaster Recovery appropriations as cited below, and all federal cross-cutting regulations.

2021 Disaster Recovery Appropriation

The U.S. Congress appropriated supplemental funding for 2021 disasters (June 25-26, 2021) through Public Law 117-43 and 117-180, of which HUD allocated City of Detroit \$95,228,000 in CDBG-DR funding to support long-term recovery efforts following FEMA #4607 - Michigan Severe Storms, Flooding and Tornadoes, through the Federal Register, Vol. 87, No. 100, May 24, 2022, and 6368-N-01 January 18, 2023.

2023 Disaster Recovery Appropriation

The U.S. Congress made supplemental disaster assistance funding for 2023 disasters (August 24-26, 2023) available for Public Law 118-158, of which HUD allocated the City of Detroit \$346,846.000 in CDBG-DR funding to support long-term recovery efforts following FEMA# 4757 - Michigan Severe Storms, Tornadoes, and Flooding, through the Federal Register, Vol. 90, No. 10, Thursday, January 16, 2025

The City of Detroit, through the Housing and Revitalization Department, seeks to use its Community Development Block Grant Disaster Recovery Public Facility Rehabilitation (PFR) funds to address the needs of residents who utilize emergency shelters. The City is seeking applications from nonprofit organizations that have the skills and expertise to undertake eligible projects described in Section 1.4.

The Housing and Revitalization Department soundly and transparently invests funds and delivers services to ensure that housing and neighborhoods are high quality, affordable, and accessible to and for all Detroiters. The Public Facility Rehabilitation Underwriting program aims to address unmet needs by investing CDBG-DR funds into nonprofit organizations operating emergency shelters. These improvements often create a capacity to serve more low- to moderate-income persons or maintain the number of persons currently served.

1.2 Scope

This policy and procedure document identifies the goals of the Public Facility Rehabilitation program as administered for the City's allocation of CDBG-DR funding. It also identifies the Notice of Funding Availability process through award as well as the project management, project closeout, and project monitoring processes.

1.3 Roles and Responsibilities

Housing and Revitalization Department: Determines when a NOFA will be issued, the categories of project types that will be included in the NOFA, and the amount of funding available for each project type category. HRD also issues a public notice of the NOFA, establishes application submission deadline dates, uses a scoring and committee review process to evaluate the alignment of applications received with city development priorities, and issues awards to the highest-scoring projects.

Project Managers: Designated staff within HRD that manage the project through closeout and HUD-required monitoring. Follow all applicable project steps detailed in the project plan including all required forms and templates. See the appendix for a sample project plan.

1.4 Eligible Activities

Eligible activities under the PFR program as funded by CDBG-DR include the acquisition, construction, reconstruction, rehabilitation, or installation of emergency shelters and improvements that are eligible under §570.201(c) and may be carried out by the City, a Subrecipient, or another nonprofit organization.

Each activity must:

- be CDBG eligible (or allowed via a waiver)
- address a disaster-related impact, and
- meet a National Objective

Disaster-related activities are those that demonstrate (1) a local connection to the disaster, and (2) how the activity will contribute to long-term recovery.

Section 2: PFR Funding Requirements

2.1 Meeting a National Objective

➤ 24 CFR 570.208

The primary objective of this program is the development of viable urban communities through the provision of decent housing, a suitable living environment, and expanded economic opportunities principally for persons of low- and moderate-income, defined as a person residing in a household with income at or below 80% of area median income adjusted for household size (LMI).

To achieve these objectives, the CDBG-DR program includes a wide variety of eligible activities that may be implemented provided that a given activity meets one of three National Objectives, including:

- Benefit low- and moderate-income persons;
- Preventing and eliminating slum or blight; and
- Meeting an urgent need.

The LMI national objective is often referred to as the “primary” national objective because the statute requires that recipients expend 70 percent of their CDBG funds to benefit LMI persons.

Income Limits are updated annually by HUD. The most recent limits are provided every spring by HUD and implemented for that program year. The HUD-issued Income Limits are available on HUD’s website – through the HUD Exchange, but CDBG Program Staff also typically notify CDBG-funded Subrecipients when the income limits are updated by HUD. Subrecipients are responsible for ensuring they are using the most current income limit.

Public Facility Rehabilitation Program and National Objectives

As discussed above, the primary emphasis of this program is to ensure that each activity meets and complies with one of HUD’s three major national objectives. As illustrated in the National Objectives Table below, to meet the HUD national objective, each project plan or “activity” must be able to demonstrate that it has satisfied the need to meet the national objective by meeting the threshold below.

National Objective Table

National Objective	Income Documentation Tool	Minimum LMI	Period
Area Benefit	Description of Service Area with: Map with Boundaries Documentation that Area is primarily residential Documentation of Income Characteristic (Census Block Area of	51% of residents in service area must be LMI	At Project Conception

Survey) 2016-2020 HUD ACS data is required by HUD unless a survey is done.

Limited Benefit	Clientele	Income Documentation for each individual served:	At least 51% of clientele served by the facility must be LMI	At Intake
*If citizen is a presumed benefit, then no support documentation is needed to verify income. However, citizen would have to supply information showing they're a presumed benefit.				
		Third-Party Verification; required if financial assistance is distributed		
		Self-Declaration of Income		

2.2 Eligible Activities under the CDBG-DR

- 24 CFR 570.506(a)
- 24 CFR 570.201(c)
- 24 CFR 570.208(a)(1)
- 24 CFR 570.506(b)(2)
- 24 CFR 570.208(A)(2)

The following is an overview of the eligible PFR activities under the CDBG-DR program requirements per 24 CFR 570.201. The PFR program funded by CDBG-DR is limited to costs associated with the acquisition, rehabilitation, and other improvements of emergency shelters. For additional information, please see the HUD exchange website.

Eligible PFR Activity	Matrix Code	National Objective
Acquisition	01	LMA, LMAFI, LMASA, LMC, LMHSP, LMJ, LMJP, SBA, SBS, SBR, URG
Facility for Persons w/Disabilities	03B	LMAFI, LMASA, LMC, LMJ, LMJP, SBA, SBR, URG
Homeless Facilities (not operating costs)	03C	LMAFI, LMASA, LMC, LMJ, LMJP, SBA, SBR, URG

Costs associated with these eligible activities include the following:

- Material;
- Labor;
- Permits

- Engineering;
- Architects
- Asbestos Survey
- Environmental studies, reports
- Procurement
- Other consultants as needed

2.3 Ineligible Activities

- 24 CFR 570.201(c)
- 24 CFR 570.207

The following list illustrates activities that are not eligible under this program:

- General government expenses
- Back taxes, or any payment for any bad debt
- Operating and Maintenance costs
- Gifts and Donations
- Fixtures or Equipment
- Lobbying at partisan politician activities
- Suing the government
- Luxury line items
- Organization Administrative Cost
- Income Payments to clients (food, clothing, rent, mortgage, etc..)
- Building or portions thereof used for the general conduct of government

2.4 Disaster Tie-Back

HUD permits the City of Detroit to fund eligible mitigation activities that address the impacts of the disaster, as well as mitigation activities that respond solely to the Mitigation Needs Assessment. As such, activities funded under this project may address an unmet recovery need or a mitigation need related to 2021 and 2023 Disasters. Applicants to the program must state whether proposed projects respond directly to disaster-related risks and impacts or projected hazard risks unrelated to the disaster.

2.5 Mitigation Set-Aside

Unlike recovery activities that must demonstrate “tie-back” to the specific disaster and address a specific unmet recovery need for which the CDBG–DR funds were appropriated, activities funded by the CDBG–DR mitigation set-aside do not require such a direct “tie-back” to the specific qualified disaster that has served as the basis for the allocation. The CDBG–DR mitigation set-aside will only fund activities that meet the following provisions:

1. Meet the definition of mitigation;
2. Address the current and future risks as identified in the mitigation needs assessment in the Most Impacted and Distressed (MID) areas;
3. Be CDBG-eligible activities under title I of the HCDA or otherwise eligible pursuant to a waiver or alternative requirement; and

4. Meet a national objective.

Through this program, the City of Detroit will identify how its proposed use of the CDBG-DR Mitigation set-aside will meet the definition of mitigation activities, address the current and future risks as identified in the mitigation needs assessment found in the [CDBG-DR Action Plan](#), ensure that proposed activities are CDBG eligible activities, and meet a national objective.

The Public Facilities Rehabilitation – Emergency Shelter Program focuses on projects that benefit the community as a whole and will mitigate, eliminate, or reduce the loss of life or property in the face of current and future natural hazards. The program is designed to promote sound, sustainable long-term recovery and projects that account for the unique hazards, opportunities, people at risk of homelessness, and disaster impacts within impacted neighborhoods. The focus of the program is on projects that will mitigate flood damage by improving sewer and water systems and projects that will make the communities more resilient through projects such as enhancements of public facilities.

Mitigation Measures

HUD encourages CDBG-DR grantees to incorporate mitigation measures when carrying out activities to construct, reconstruct, or rehabilitate residential or non-residential structures with CDBG–DR funds as part of eligible activities and are required to establish resilience performance metrics for those activities.

All newly constructed infrastructure that is assisted with CDBG–DR funds must be designed and constructed to withstand extreme weather events and the impacts of natural hazards. To meet this requirement, subrecipients must demonstrate that they have incorporated mitigation measures into CDBG–DR projects to make their community more resilient to the impacts of recurring natural disasters. When determining which mitigation measures to incorporate, subrecipients should design and construct structures to withstand existing and future climate impacts expected to occur over the service life of the project.

Projects must identify how they will mitigate measures will be incorporated, including the following examples \:

- Incorporating resilient construction standards
- Using resilient building materials and technology
- Elevating facilities
- Use of more renewable energy technologies
- Utilization of backup power for critical facilities
- Integration of open space or use of nature to manage flooding
- Other

Resilience Metrics :

- Number of acres no longer vulnerable to flood events
- Number of floodplain design standards updated
- Number of public facilities constructed or reconstructed
- Number of residents protected from future flooding
- Other

2.6 Duplication of Benefits

Section 312 of the Robert T. Stafford Disaster Assistance and Emergency Relief Act (42 U.S.C. 155) prohibits any person, business concern, or other entity from receiving financial assistance with respect to any part of a loss resulting from a major disaster for which he/she has received financial assistance under any other program or from insurance or any other source. Disaster Recovery funds issued through HUD's CDBG-DR program may not be used for any costs for which other disaster recovery assistance was previously provided for the same purpose.

Subrecipients and any partners are required to disclose all other benefits (cash, in-kind, grants, loans, etc.) received, or which will be received for the proposed project to ensure that federal funds do not duplicate funds received from other sources. They will also sign a subrogation agreement as part of any written Agreement.

As mandated by regulation, all City of Detroit projects/activities receiving CDBG-DR funding must evidence an analysis of funds potentially received for the same purpose as the intended CDBG-DR award, otherwise known as a Duplication of Benefits (DOB) analysis. All funded projects/activities must disclose all funding sources, including FEMA awards and private insurance proceeds, to be analyzed.

a. List of Potential Duplicative Benefits

The subrecipient or developer must consider the total assistance available to them. This includes all benefits, including cash, insurance proceeds, grants from FEMA, SBA loans, as well as any other assistance received by the applicant/developer from other local, state, or federal programs, or private or public nonprofit charities. Developer partners with City of Detroit should pay special attention to the following potential sources of benefits and confirm that the listed sources of these benefits have been exhausted or may be made available for the project/activity:

- National Flood Insurance Program (NFIP): Insurance proceeds received must be disclosed by the Applicant.
- Private Insurance: All insurance proceeds received must be disclosed by the Applicant. Where necessary, the program will look for "undeclared" insurance benefits as well as confirming those disclosed by the Applicant.
- FEMA: FEMA proceeds received must be disclosed by the Applicant.
- Other: Funds received from other sources must be disclosed by the Applicant and verified by the program. Examples include nonprofits, other governmental agencies, and social groups.

HRD CDBG-DR Duplication of Benefits Policy

City of Detroit will only use documentation supplied by the Applicant/Developer if source documentation is unable to be obtained. If an Applicant can provide documentation demonstrating that the insurance proceeds amount provided by the FEMA database includes items not covered in the evaluation or not paid to cover structural loss, City of Detroit will use the documentation provided to adjust the insurance payout considered in the DOB analysis. The documentation provided by the Applicant must come from the insurance company that issued the payment(s). For more information on how DOB is calculated and the documentation required please refer to CDBG-DR DOB policy below:

<https://detroitmi.gov/departments/housing-and-revitalization-department/hud-programming-and-information/cdbg-disaster-recovery>

2.7 Minimum and Maximum Awards

City of Detroit reserves the right to award more or less CDBG-DR funding than the amount of funds requested based upon funding availability and review those exceptions on a case-by-case basis.

Unless authorized by HRD, the minimum and maximum CDBG-DR award amounts per activity are:

- 2021 Disaster:
 - Minimum Award: \$300,000
 - Maximum Award: \$5,000,000
- 2023 Disaster:
 - Minimum Award: \$300,000
 - Maximum Award: \$10,000,000

2.8 Timely Expenditure of Funds

To ensure expenditure of all CDBG-DR funds within the required six-year period, the City of Detroit must submit projections regarding the obligation and expenditure of all CDBG-DR funds over the life of the award as well as the anticipated outcomes associated with program activities. These projections enable the City of Detroit and the Department of Housing and Urban Development (HUD) to evaluate progress on program activities and ensure recovery efforts are achieved in a timely manner.

To achieve these goals, the Housing and Revitalization Department has established the following procedures to track Timely Expenditures for CDBG-DR:

<https://detroitmi.gov/sites/detroitmi.localhost/files/2024-09/HRD%20CDBG-DR%20Procedures%20to%20Determine%20Timely%20Expenditures%2005.24.24%20-%20CURRENT.pdf>

2.9 Reporting

Subrecipients must submit quarterly reports to the Housing and Revitalization Department. Quarterly Activity Reports are due no later than the 15th of the month following the end of the quarter even if a request for reimbursement has not been submitted. The Quarterly Activity report explains the progress that has been made concerning the goals and performance indicators outlined in the subrecipient agreement.

End of project CDBG-DR reporting requirements may include the following (depending on project type):

- Number of elevated structures
- Number of non-business organizations benefitting
- Number of public facilities
- Number of Section 3 labor hours

- Number of targeted Section 3 labor hours
- Number of total labor hours
- Number of low/mod persons assisted
- Number of linear feet of public improvement
- Number of facilities with mitigation measures
- Number of buildings (non-residential)

2.10 PFR Activities and the Disaster Recovery Action Plans

This Program Policy Manual complements the City's CDBG-DR Action Plan. The Action Plan is developed with citizen input and describes the structure and process for the administration of the City's CDBG-DR funding. The Action Plan also identifies needs within the City, objectives to address those needs, and the basis for allocating funds between program activities developed to meet those objectives.

2.11 Cross-Cutting Federal Regulations

In addition to making sure that the eligible activity meets a national objective, construction projects that are over \$2,000 and funded by CDBG-DR must adhere to the Davis-Bacon Act and are required to ensure that any contractors or sub-contractors are paid a federal prevailing wage.

Project managers are required to review all contractor procurement documentation and ensure that cross-cutting federal regulations, such as the Davis-Bacon Act, are listed.

Construction activities that are over \$200,000 are required to follow Section 3 provisions. The Labor Compliance division is responsible for the oversight of both Labor Standards and Section 3. Prior to executing a contract for any PFR activity, the PFR project manager must notify the Labor Compliance to allow for the proper application and monitoring of Davis-Bacon and Section 3.

Additional cross-cutting federal regulations can be found in the Exhibit-D document (see appendix) that must be signed by the general contractor before construction begins.

2.12 Environmental Review

All PFR projects must undergo an environmental review as required and described in 24 CFR Part 58. PFR projects undergo an environmental review at two separate stages. Once a PFR project has been approved by the award committee, PFR staff will submit for the predevelopment environmental review. Environmental review is required for predevelopment costs as defined by 24 CFR Part 58.35(b)(6), "including legal, consulting, developer and other costs related to obtaining site options, project financing, administrative costs and fees per loan commitments, zoning approvals, and other related activities which do not have a physical impact." No construction or Choice Limiting Actions as defined in 24 CFR Part 58.22 will occur under the predevelopment phase of the project. A second environmental review must be completed once a complete scope of work is established for the rehabilitation project. The environmental review includes an appropriate Certification signed by the Certifying Officer or the Authority to Use Grant Funds (AUG) from HUD is received for the entire scope of construction work. This Certification or AUGF must be received prior to increasing funding or amending agreements with the subrecipient to allow for

construction costs for rehabilitation activities. Please see the environmental team policies and procedures document for more information.

2.13 Flood Insurance Requirements

102(h) of the Flood Disaster Protection Act of 1973 is a section of the act that requires flood insurance for buildings and projects in areas that have been identified by the Administrator as having special flood hazards and in which the sale of flood insurance has been made available under the National Flood Insurance Act of 1968. This portion of the Act states that no Federal Officer or Agency shall approve any Federal financial assistance for acquisition or construction purposes for use in any area that has been identified as an area having special flood hazards unless the building and any property to which such financial assistance relates is covered by flood insurance in an amount at least equal to its development or project costs (less estimated land cost) or to the maximum limit of coverage made available with respect to the particular type of property under the National Flood Insurance Act of 1968, whichever is less.

2.14 Flood Insurance Standard

In addition to complying with all general federal flood insurance requirements, HUD- assisted property owners must comply with provisions specifically tied to receiving disaster response assistance. Section 102(a) of the Flood Disaster Protection Act of 1973 (42 U.S.C. 4106), requires that recipients of financial assistance maintain flood insurance. City of Detroit will ensure that property owners in a Special Flood Hazard Area obtain and maintain flood insurance in the amount and duration prescribed by FEMA's National Flood Insurance Program (NFIP) regardless of whether there is a federally backed mortgage on the property.

City of Detroit will not provide disaster assistance for the repair, replacement, or restoration of a property to a person who failed to obtain and maintain flood insurance required as a condition for previous receipt of federal flood disaster assistance in accordance with the National Flood Insurance Reform Act of 1994.

Projects are required to bring shelters into compliance with the minimum shelter standards identified in the Shelter Standards document unless the building is unable to support the changes and a waiver of the minimum standard is authorized by HRD. These standards are listed as an appendix to the sample NOFA, in Section 7.2. Nonprofit organizations should strive to maximize the number of the preferred ideal standards included in the Shelter Standards document the proposed project scope. HRD has also included other ideal standards in the Shelter Standards document for nonprofit organizations to consider when developing the project scope. Additional points will be awarded to projects based on the number of preferred ideal standards and other ideal standards included in the project scope.

Section 3: NOFA and Award Process

3.1 PFR NOFA and Award

The PFR NOFA process is initiated by the submission of a requisition through the City's Oracle system. Please see the HRD requisition checklist for additional information on submitting the requisition. Public advertisement of the funding availability is fulfilled by publication on the City website, email notification

to the PFR interested parties list, and other OCP guided notifications. Once submitted, PFR staff will work with OCP to identify the NOFA timelines, public meetings to be held, and application deadlines.

OCP will assist with the collecting of applications through Oracle and the creation of a scoring consensus committee. Committee members are required to sign the OCP Confidentiality agreement prior to reviewing applications. Committee members will be supplied with a scoring grid (created by PFR staff) and are required to score the applications individually. Once scored, the committee will meet and decide on a consensus score for each applicant. Assuming eligibility and threshold criteria are approved, applications will be recommended starting with the highest-scoring applications and continuing until potential funds are expended.

- ***Fees for use of facilities.*** Reasonable fees may be charged for the use of the facilities assisted with CDBG-DR funds, but charges such as excessive membership fees, which will have the effect of precluding low and moderate income persons from using the facilities, are not permitted.
- Special care is to be taken when partially funding a project. Projects must be completed to generate the accomplishment data necessary to close a project in the Federal DRGR system. Partially funded projects risk not being completed, which would require the subrecipient to repay the CDBG-DR funding.

Once projects have been identified, an award memo will be created and presented to an award committee. Award committee members will also need to sign the OCP confidentiality agreement to engage in the awarding of projects. Memos presented to an award committee should identify, at a minimum, the project scope, projected budget, national objective and subcategory (typically LMA or LMC for PFR projects), and eligible activity. Please see the appendix Section 7.3 for a sample PFR Award Memo. Eligible projects awarded through another City of Detroit competitive process may also be awarded these CDBG-DR funds. Selected projects will be sent an award letter identifying the next steps including gathering OCP documents required for subrecipient agreement approval.

3.2 Identifying the National Objective

➤ 24 CFR 570.208

PFR projects are typically eligible for CDBG-DR funding using the Low/Moderate Income (LMI) national objective benefiting low- and moderate-income persons or households. There are several categories under this national objective, with Low Mod Area Benefit (LMA) and Low Mod Limited Clientele (LMC) being the most commonly used for PFR projects. During the NOFA application and award process, project staff should take care to identify an eligible national objective category prior to presenting a funding recommendation to City Council. Ideally, this is part of the award memo that is presented to the award committee.

Low Mod Area Benefit (LMA) – 24 CFR 570.208(a)(1)

Subrecipient projects are eligible under the LMA national objective category if all residents in a defined service area benefit from the eligible activity. These services must be available to all residents and take place in a service area that is primarily residential and comprised of at least 51% LMI residents.

The steps for qualifying a PFR project using the LMA national objective category are as follows:

1. Define the Service Area

- The service area is identified using the nature of the activity, location of the activity, accessibility of the services, availability of comparable activities, and established boundaries. Nonprofit organizations may also have data on the geographic range of services provided.

2. Document the Low/Mod Income Qualifications

- Using the defined service area, the HUD LMI Map Application can be used to determine Low/Mod eligibility (51% of beneficiaries are LMI). This is done by drawing the service area, exporting the income data as a CSV file, and dividing the LowMod total by the LowModUNIV total. HUD requires the use of [2016-2020 ACS data](#).

3. Identify Census Tracts/Block Groups

- The same exported CSV data that was used to determine the LMI percentage will contain the census tract and block groups of the defined service area.

4. Submit DRGR Setup

- The DRGR setup staff will need to be supplied with the national objective, matrix code, project description, project budget, and all census tract and block groups within the defined service area.

Low Mod Limited Clientele (LMC) – 24 CFR 570.208 (a)(2)

The LMC national objective category should be used when a CDBG-DR-assisted activity benefits a specific group of participants rather than everyone in an area. Documentation must be provided that at least 51% of beneficiaries qualify as LMI. There are eight clientele categories that can be presumed to be principally LMI as follows:

- Abused children
- Battered spouses
- Elderly persons
- Severely disabled adults
- Homeless persons
- Illiterate adults
- Persons living with AIDS
- Migrant farm workers

If the eligible activity does not serve one of these categories, documentation is required on family size and income to show that at least 51% of the clientele are LMI. The beneficiary data form is to be collected as part of the project closeout procedure.

Section 4: Project Management

4.1 Project Steps

Award and Preconstruction Phase (Phase 1)

Once NOFA applications have been scored and ranked, award letters will be sent to the selected applicants. These award letters will detail the documents needed to receive an approved and executed subrecipient agreement. PFR subrecipient agreements will be approved in two phases. The initial subrecipient agreement, upon completing the OCP approval process, will receive a Notice to Proceed to being Phase 1 (predevelopment) which will include a budget to complete the following predevelopment items:

- Procurement of an owner's representative/construction management consultant
 - Owner's representatives are expected to act on behalf of the subrecipient in all procurement and contractual agreements. Owner's representatives must have construction project management experience and knowledge of evaluating and managing federally funded construction projects. If no owner's representative is contracted, the subrecipient must provide documentation demonstrating it has an internal staff member with the knowledge and capacity to manage the project. A waiver to not contract an owner's representative must be approved by HRD. HRD may recommend the use of an owner's representative that has been engaged by the City through a separate procurement process to perform these activities.
- Completion of a Capital Needs Assessment (CNA), with the assistance of the owner's representative, that shows the scope of work required to comply with the minimum standards included in the HRD Emergency Shelter Standards document (found at the end of the sample NOFA in Section 7.2). The CNA must also indicate the ability of the project to incorporate as many of the preferred shelter standards found in the HRD Emergency Shelter Standards document as possible.
- Procurement of an architect, with the assistance of the owner's representative, to complete drawings required to develop the project scope and create a contractor bid package
- Procurement of environmental consultants, with the assistance of the owner's representative, associated with obtaining environmental clearance
- Procurement of a contractor, with the assistance of the owner's representative, to complete the project construction

All contracted services (environmental/architectural/construction) must adhere to the federal procurement standards and must be registered with sam.gov. This can be found at 2 CFR 200.320. It is generally assumed that all contractors and consultants will exceed the micro-purchase threshold amount and require price/rate quotations from an adequate number of qualified sources. Project managers will assist in tracking subrecipient contractor procurement by completing the procurement register document.

Prior to executing a subrecipient agreement and moving forward with finalizing the scope of work and budget, the Housing and Revitalization Department (HRD) will perform a second DOB check. Applicants will be required to submit a new DOB form during the agreement drafting process. HRD will review the

forms and support documentation, as applicable, and ensure there is a continued unmet need, and no duplication has occurred. If funds received from another source are insufficient to fulfill the unmet need, the award amount may be reduced to ensure no DOB occurs.

DRGR Setup

PFR staff will coordinate with the HRD CDBG-DR Administrative team to ensure the project is created and funded in the Disaster Recovery Grant Reporting System (DRGR). This will include the selected national objective category and associated data.

General Contractor Procurement

➤ 24 CFR 200.320

The project architect will work with the subrecipient to create a bid package. The subrecipient will publicly advertise the construction project (website, social media, etc.) and is encouraged to reach out to potential general contractors as well. Advertisements should have an adequate description of the scope of work being procured, the location of the work, and key dates and times such as pre-bid meetings or walkthroughs, a question deadline, and a due date for responses. The advertisement will include all cross-cutting federal regulations that apply to the project, such as Davis-Bacon prevailing wages and bond requirements, if applicable. The Subrecipient must obtain HRD approval of the advertisement and bid packet prior to publishing. The subrecipient will open the sealed bids and read them in a public setting. The lowest responsive and responsible bidder (assuming all qualifications are satisfied) is selected. PFR staff will review the bid tabulation and include a copy in the project file.

Note: Environmental review is required for predevelopment costs as defined by 24 CFR Part 58.35(b)(6), “including legal, consulting, developer and other costs related to obtaining site options, project financing, administrative costs and fees per loan commitments, zoning approvals, and other related activities which do not have a physical impact.” No construction or Choice Limiting Actions as defined in 24 CFR Part 58.22 will occur under the predevelopment phase of the project. A second environmental review must be completed once a complete scope of work is established for the rehabilitation project at the Site. The environmental review includes an appropriate Certification signed by the Certifying Officer or the Authority to Use Grant Funds (AUGF) from HUD is received for the entire scope of construction work. This Certification or AUGF must be received prior to increasing funding or amending agreements with the subrecipient to allow for construction costs for rehabilitation activities.

Construction Phase (Phase 2)

Upon completion and approval of predevelopment items, HRD will review the proposed construction scope and budget. The HRD Construction team will also complete a review of the selected contractor. If approved, HRD will then draft an amendment to the subrecipient agreement. This will require an additional Oracle requisition to amend the subrecipient agreement and add funds to an approved purchase order. Once approved by City Council, the updated project scope and budget will allow for the following items:

- Unreimbursed eligible and approved predevelopment costs
- Project management consultants
- Construction costs

Awarded subrecipients will receive a Notice to Proceed to begin both the predevelopment and construction phases. Project costs incurred prior to receiving a Notice to Proceed are at risk of not being eligible for reimbursement and may jeopardize the City's ability to fund the project.

Preconstruction Meeting

PFR staff will coordinate a pre-construction meeting with the following representatives

- Owner's Representative
- City Labor Standards (Davis-Bacon and Section 3)
- City Construction team
- City Environmental team
- Subrecipient
- General Contractor (or other contractor)

This meeting will allow these respective teams to outline their role in the project, introduce required documentation, and answer any questions. Please see the various section policy and procedure documents for specific requirements. The Construction team will work with the General Contractor to set up meeting and draw schedules. Please see the Construction Team Policies and Procedures for more details.

Additional Preconstruction Items

- 24 CFR 570.609
- 24 CFR 570.503
- 24 CFR 570.505

- Before pictures
 - PFR staff will request and document before pictures of the project site
- Soft Cost Draw
 - The subrecipient may submit for a soft cost draw to be reimbursed for costs associated with the environmental clearance and costs eligible under the Notice to Proceed for phase 1 (predevelopment). Please see the draw process below.
- 5-year lien
 - PFR staff will work with the subrecipient to complete a 5-year lien for the contract amount. This lien will be filed with Wayne County and a record kept in the project file.
 - This step must be completed before a Notice to Proceed for Phase 2 (construction) can be issued.
 - Reversion of Assets
 - The subrecipient shall continue to meet the national objective until five years after expiration of the subrecipient agreement.
 - If the subrecipient cannot continue to meet the national objective, the subrecipient shall pay to the City an amount equal to the current market value of the property less any portion of the value attributable to expenditures of non-CDBG funds for the acquisition of, or improvement to, the property.
- Debarment search
 - PFR staff will check Sam.gov to ensure the general contractor is not prohibited from receiving federal funds.

- Exhibit D
 - o PFR staff will send exhibit D (cross-cutting federal regulations) to the general contractor for signature
- Bonds
 - o Payment and performance bonds are required for any construction contract that exceeds the simplified acquisition threshold.
 - o The subrecipient will forward the required general contractor payment/performance bonds to PFR staff.

HRD Construction Team

- 24 CFR 570.506(a)

The HRD Construction Team will work closely with the procured General Contractor to monitor the construction portion of the project and aid in compiling draw package material. Please see the Construction Team policies and procedures for additional information.

Draw Process

- 24 CFR 570.506
 - o Please see the construction team Policies and Procedures on accepting, reviewing, and submitting draw packages.
 - o PFR staff will accept the completed packet from the subrecipient and review for completeness, accuracy, and eligibility.
 - o The subrecipient will include a cover sheet requesting funding and attesting that payment will be remitted to the contractor within three days of receiving funds from the City.
 - o PFR staff will then submit the draw for approval through DocuSign.
 - o Draw packages will include documentation of remittance from the previous draw.
 - o Approved draw packages will be attached to the project plan and maintained as a final part of the project file.
 - o All projects are eligible to draw up to 90% of total project funding prior to project completion. Project completion includes all information required from HRD (Labor Standards, Environmental, Construction, etc.) inclusive of any accomplishment and/or beneficiary data to be submitted into DRGR.

4.2 Project Closeout

- 24 CFR § 576.500

Before a project can be closed, the following items need to be submitted by the subrecipient and approved by the project manager.

- Section 3 Form 2516
 - o Coordinate with the assigned Section 3 project manager in the Labor Standards division for document acceptance.
- After pictures

- The subrecipient must submit after pictures of the rehabilitated area
- Lien Waivers
 - Full unconditional lien waivers must be on file for all subcontractors
- Environmental memo
 - Coordinate with the assigned Environmental project manager to obtain the environmental closeout memo.
 - Identify any ongoing environmental concerns or continuing obligations.
- Beneficiary data and project narrative
 - Project managers will collect the beneficiary data (if LMC) and project narrative and provide this information to the City grants department.
 - Reporting requirements may vary depend on the project funding source.

When a PFR project nears completion, the project manager will notify Labor Standards that final payments will be submitted soon so that Labor Standards can initiate their final project review and make sure the vendor has submitted every required piece of documentation before HRD releases their final payment. The project manager should review their project files for completion and request any closeout requirements stipulated by the HRD Environmental Compliance and Historic Review Teams. The project manager will also obtain photographs of the completed work.

If any funds are remaining within the agreement budget, the project manager will send the vendor official notice of the project's closing and make clear that the vendor may not spend any of the remaining funds.

The project manager will also request or prepare any final progress reports and provide a copy to the Office of Development and Grants. The project manager should also inform their manager and the HRD financial staff that the remaining balance is available for reprogramming.

Section 5: Internal Controls

5.1 Project Closeout Checklist and Document Retention

Upon completion of a project, a PFR staff member (different from who managed the project) will complete a project closeout checklist (see appendix). This checklist will ensure that required project steps have been completed, documents signed (if applicable), and project artifacts maintained. This staff member will be assigned by the director of PFR and is responsible for the generation of a completed file on the department's SharePoint folder along with the completed checklist.

5.2 Subrecipient Monitoring

➤ 2 CFR 200.331

PFR staff conduct ongoing compliance and monitoring oversight throughout the life of the PFR and Programs. Risk assessments, desktop, and on-site monitoring visits will be conducted in accordance with the City's CDBG-DR Subrecipient Monitoring Procedures. Program staff will provide technical assistance to contractors throughout the life of each project. Monitoring and technical assistance will be focused on the following objectives:

- Reviewing and monitoring funded projects for compliance with Federal regulations, funding requirements, and program policies and procedures
- Providing guidance for continuous improvement of program delivery
- Assistance in identifying and preventing issues
- Setting program performance standards
- Completing and providing necessary reporting for HRD
- Ensure the quality of the financial management process
- Reviewing quarterly expenditures outcome performance measures

After a project is completed, PFR staff will conduct ongoing compliance monitoring. Monitoring responsibilities will include but not be limited to:

- Review the program's fiscal controls and accounting procedures for compliance with City, State, and Federal regulations.
- Policy & Compliance - Examining the PFR Program's compliance with HUD, HRD, and City regulations.
- Crosscutting Requirements - Investigating the Program's compliance with crosscutting Federal rules and regulations such as Davis-Bacon, labor standards, the ABA, the Americans with Disabilities Act, and other Federal requirements.

The PFR Program Team will be responsible for addressing any inconsistencies and discrepancies identified by the HRD staff member completing the project monitoring. A monitoring checklist (see appendix) is required to be completed for every monitoring visit.

5.3 Record Retention & Recordkeeping Policies

➤ 24 CFR 570.502(a)(7)(i)

All records related to the contract or Subrecipient agreement, including financial, client, and administrative files must be maintained for no less than three (3) years from the date of the project/program close-out, per 24 CR 570.502(a)(7)(ii). This includes complete source documentation used for financial reimbursement and to determine eligibility.

Records shall be kept in an orderly manner and stored electronically. Final documents will be stored using an approved system (Neighborly, Smartsheet, SharePoint, etc.) that has been vetted by HRD leadership.

5.4 Financial Management

➤ 2 CFR 200

HRD agrees to comply with 2 CFR, Part 200 and agrees to adhere to the accounting principles and procedures required therein, utilize adequate internal controls, and maintain necessary source documentation for all costs incurred.

Any CDBG-DR funds that are passed-through to the Subrecipient will administer the CDBG-DR funds awarded in conformance with Uniform Administrative Requirements, Cost Principles, and Audit

Requirements for Federal Awards (also known as the Super Circular) codified at 2 CFR, Part 200. These principles shall be applied for all costs incurred whether charged on a direct or indirect basis.

5.5 Cost Principles

➤ 2 CFR Part 200 Subpart E

To be allowed under CDBG-DR (and other federal programs), cost must meet the following general criteria:

- Be necessary and reasonable for proper and efficient performance and administration of the federal award;
- Be allocable to the federal award under the provisions of 2 CFR Part 200;
- Be authorized or not prohibited under state or local laws or regulations;
- Be adequately documented;
- Be the net of applicable credits (that is, any credits such as discounts or price adjustments must be deducted from the total costs charged);
- Not be included as a cost or used to meet cost sharing or matching requirements of any other federal award in either the current or a prior period, except as specifically provided by federal law or regulations;
- Be determined in accordance with generally accepted accounting principles;
- Be consistent with policies, regulations, and procedures that apply uniformly to both federal awards and other activities of the governmental unit

HRD staff have a responsibility to ensure that the price for costs charged to the City and paid with federal grant funds are reasonable. PFR staff will be required to perform a cost and/or price analysis each time three main actions are taken:

- 1) when reviewing responses to Requests for Proposals received from bidders, prior to selecting the winning vendor and issuing a contract
- 2) when negotiating the terms of sub-recipient agreements
- 3) when extending, increasing, modifying, or otherwise amending either a contract or a sub-recipient agreement. Another important responsibility of the HRD PM is to ensure that sub-recipients are also performing such analyses and documenting cost reasonableness when they solicit goods or services under a federally-funded sub-recipient agreement.

5.6 Program Income

➤ 24 CFR 570.500(a)

Program income is not anticipated through the PFR and PI programs. However, in the event that there is program income derived from the sale of a property where CDBG-DR funds were put into a PFR project, the Subrecipient the balance shall revert to the City's CDBG-DR program for further reallocation.

Section 6. General Policies

6.1 Cross-Cutting Federal Regulations

HRD employees should familiarize themselves with the key cross-cutting regulations that apply to both their actions if their salaries or hourly pay are funded by CDBG-DR, as well as to all vendors who accept CDBG-funded contracts from HRD. Additionally, all sub-recipients must follow these regulations in carrying out activities funded by CDBG-DR, and sub-recipients must ensure that any vendors they hire are following the regulations.

CDBG-DR-funded agreements should include explicit language on the cross-cutting regulations. The baseline set of regulations that should be referenced may be found in the Appendices. Other federal regulations should be cited as applicable to each project, especially if multiple funding sources are going into the contract. In addition to including this language in agreements issued by HRD, HRD employees should make sure that copies of the language are provided to their vendors, including sub-recipients, to be included in all sub-contracts their vendors may enter into using federal funds.

Please see Exhibit D in the Appendix for a list of cross-cutting regulations that apply to PFR projects.

6.2 Waiver of Policy/Policy Exceptions

These policies and procedures shall be implemented in a uniform and consistent manner. Alternatively, policy exceptions may be made on a case-by-case basis for extenuating circumstances with justification, as long as such exceptions do not negatively impact the overall outcome of the program or unintentionally negatively affect other applicants, or provide an undue advantage or benefit. Requests for policy waivers will only be considered for HRD internal policies; HRD will not violate HUD policies in granting waivers.

Requests for policy exceptions/waivers shall be submitted in writing, to the PFR Manager, and shall contain the following:

- State the specific policy provision for which the waiver is requested.
- Clearly describe the specific circumstances and facts on which the request for waiver is based.
- State the reasons why the waiver is felt to be warranted in the particular circumstance.

If determined to be a reasonable request for waiver, the PFR manager will request approval from HRD leadership.

Section 7. Appendix

7.1 Update Summary

Update Summary

The following lists the changes to this policy/procedure since the last approval:

Policy/Procedure Section	Change
	<ul style="list-style-type: none">

☒ No changes – this is a new policy/procedure

7.2 Distribution & Training Plan

Distribution & Training Plan

The following lists the Distribution & Training Plan for this policy/procedure:

Item	Description	
Implementation Leader	Individual responsible for distribution and training of the P&P (likely the P&P Author).	Steve Girodat
Audience	List of teams/roles/entities for which P&P applies; this includes HRD, OCFO, and other COD staff (e.g. Law), as well as external partners (e.g. subrecipients and contractors).	PFR
Distribution & Training Plan	Distribution Method (likely Email): Anticipated Distribution Date: Distribution Recipients: Training Required (Yes/No): Training Method (Virtual, In-Person, All-Staff Meeting): Anticipated Training Date: Training Recipients:	Email

7.3 PFR Award Memo

PFR – Award Memo

Project Overview	
Subrecipient Name	
Project Address	
Total Project Cost	
City Award	
Funding Source/Program Year	
National Objective	
National Objective Subcategory	
Eligible Activity	

Executive Summary:

Provide a summary of the project scope and timeline. Include the items to be accomplished, who will be impacted, and any project goals. Also, include any other entity that will be included in the project (outside funding or other). Indicate if this has been selected through OCP process and its score. Does the project have an architect/general contractor?

Subrecipient:

Provide a background of the organization and the services they provide. Include historical information, population served, and any available program statistics.

National Objective/Subcategory Rationale:

Include a summary of how this determination was met and the required documentation. For example,

LMA: requires a defined service area (can use 5 factors), the service area be primarily residential, the activity benefits/services be offered to the entire population within this service area, and the service area population LMI be greater than 51% (use income calculator). If using LMA, include census tract and block group which will be needed in IDIS.

LMC: requires 51% of benefits/services made to documented LMI individuals (need financial information), OR participation is limited to only LMI individuals (need financial information). Can also use 8 categories of presumed LMI but would need documentation (can use self-certification).

Project Financing:

Describe all project funding sources and include all private/equity funding. Ensure all sources have been committed.

NOTE: As CDBG is a reimbursement program, the NOFA typically requests the subrecipient have three months of project expenses on hand. Subrecipients often show this by submitting a bank statement. Confirm with the subrecipient that these funds can be committed to the project and are not needed for operations.

Permanent Sources	
City CDBG Award	\$0
	\$0
Total	\$0

Permanent Uses	
Phase 1 Services	\$0
	\$0
	\$0
Total	\$0

Attachments:
LMI Calculator

7.2 Sample NOFA

City of Detroit Housing and Revitalization Department Public Facility Rehabilitation Program



Notice of Funding Availability

Community Development Block Grant

Disaster Recovery (CDBG-DR) Funding

Michael E. Duggan, Mayor
Julie Schneider, Director

NOFA: #186079

Date Released: September 17, 2025

Closing Date: October 17, 2025

Table of Contents

Table of Contents	27
Section 1: Introduction	29
1.1 Program Goals	29
1.2 Eligible Activities	29
1.3 Award and Contract Procedure	30
1.4 Program Guidelines	31
1.5 Program Timeline	33
1.6 Continued Use Requirement/Change of Use Requirements	10
1.7 Record-Keeping and Reporting Requirements	10
1.8 Additional Federal Requirements	10
Section 2: Program And Application Requirements	12
2.1 Program Year Timeline	35
2.2 Subrecipient Expectations and Requirements	13
2.3 Eligible and Ineligible Items for Public Facility Rehabilitation Projects	13
2.4 Application Review Criteria	14
2.5 Application Requirements	14
2.6 Submission Method	14
2.7 Application Deadline	15
2.8 Completeness	15
Section 3: Application	16
3.1 Cover Sheet	16
3.2 Threshold Requirements (To Be Completed in Oracle)	18
3.3 Narrative Questions	20
3.3.1 Organizational Experience	20
3.3.2 Capacity and Feasibility	21
3.3.3 Project Description	22

Section 1: Introduction

The U.S. Department of Housing and Urban Development (HUD) has allocated the City of Detroit, through its Housing and Revitalization Department (HRD), Community Development Block Grant – Disaster Recovery (CDBG-DR) funding to support long-term recovery efforts following storm events from the 2021 and 2023 Presidential Major Disaster Declarations.

2021 Disaster Recovery Appropriation

The U.S. Congress appropriated supplemental funding for 2021 disasters through Public Law 117-43 and 117-180, of which HUD allocated City of Detroit \$95,228,000 in CDBG-DR funding to support long-term recovery efforts following FEMA #4607 - Michigan Severe Storms, Flooding and Tornadoes, through the Federal Register, Vol. 87, No. 100, May 24, 2022, and 6368-N-01 January 18, 2023.

2023 Disaster Recovery Appropriation

The U.S. Congress made supplemental disaster assistance funding available for Public Law 118-158, of which HUD allocated the City of Detroit \$346,846,000 in CDBG-DR funding to support long-term recovery efforts following FEMA# 4757 - Michigan Severe Storms, Tornadoes, and Flooding, through the Federal Register, Vol. 90, No. 10, Thursday, January 16, 2025

Public Facility Rehabilitation Allocation of Disaster Recovery Funding

The City of Detroit, through the Housing and Revitalization Department, seeks to use its Community Development Block Grant Disaster Recovery Public Facility Rehabilitation¹ (PFR) funds to address the needs of residents who utilize emergency shelters. The City is seeking applications from nonprofit organizations that currently operate emergency shelters who have the skills and expertise to undertake eligible projects described in this Notice of Funding Availability (NOFA).

The City intends to award up to \$18,000,000 in 2021 CDBG Disaster Recovery funds and up to \$23,470,800 in 2023 CDBG Disaster Recovery funds for Emergency Shelter – Public Facility Rehabilitation projects. Funding decisions will be awarded based on the quality and quantity of applications received.

Program Goals

The PFR program is designed to aid emergency shelter providers in the rehabilitation of their existing facilities. Emergency shelters are defined as a facility that provides temporary overnight lodging for people experiencing homelessness, which can include families with minors, single adults, and youth aged 18-24. For the purposes of this NOFA, emergency shelters providers must accept referrals through Detroit's coordinated entry system, CAM as well as enter data into the Homeless Management Information System (HMIS) data system or a comparable data base if serving survivors of domestic violence.

Organizations that currently operate an emergency shelter located in the City of Detroit are encouraged to apply for funding if the current facility requires repair and/or renovation. Funding will be made available for predevelopment costs associated with the development of the project scope and budget, as well as the construction phase of the project.

By applying, the applicant is informing HRD of projects it intends to undertake to address an unmet disaster recovery need of the organization and/or an unmet disaster recovery, mitigation, and/or resilience need in the community. The applicant is also committing to working collaboratively to serve the community while building local capacity. To pass an eligibility threshold review, a submitted application must be complete, with all required documentation, and clearly demonstrate that it meets all program eligibility requirements.

To improve long-term community resilience, the CDBG-DR program outlined in the Federal Register requires grantees to fully incorporate mitigation measures that will protect the public, including people at risk of homelessness, from the risks identified by the grantee, among other vulnerabilities.

1.2 Eligible Activities

PFR activities that are assisted with CDBG-DR funds must be designed and constructed in a resilient manner to withstand extreme weather events and the impacts of natural hazards. Proposed activities shall include sustainable planning and design methods that promote adaptation and resilience, including the use of adaptable and reliable technologies to prevent premature obsolescence of public facilities. The proposed activity will integrate mitigation measures and strategies to reduce the risks associated with natural hazards and extreme weather events. The proposed activity design must be reasonable, efficient, durable, and address an unmet or mitigation need. The proposed activity should also consider the use of alternative materials and innovative design options where appropriate. Projects are required to bring shelters into compliance with the minimum shelter standards identified in the Shelter Standards document (included at the end of this NOFA), unless the building is unable to support the changes and a waiver of the minimum standard is authorized by

¹ Public Facility Rehabilitation is broadly interpreted to include all improvements and public facilities that are either publicly owned or that are traditionally provided by the government, or owned by a nonprofit, and operated so as to be open to the general public.

HRD. Nonprofit organizations should strive to maximize the number of the preferred ideal standards included in the Shelter Standards document (identified by an asterisk) in the proposed project scope. HRD has also included other ideal standards in the Shelter Standards document for nonprofit organizations to consider when developing the project scope. Additional points will be awarded to projects based on the number of preferred ideal standards and other ideal standards included in the project scope.

Projects awarded through this NOFA will be completed in the following two phases:

Predevelopment Phase: Predevelopment funding is available to support organizations with predevelopment costs in anticipation of a rehabilitation project. This includes costs associated with developing a comprehensive project plan and budget for a proposed project. Examples of costs include completing master rehabilitation plan/capital needs assessment, an owner's representative consultant, architectural and engineering services, contractor procurement, and environmental consultant costs. The maximum award of predevelopment funding is \$100,000 unless otherwise authorized by HRD.

Construction Phase: Funding is available to support the construction phase of CDBG-DR projects. Typical costs include architectural services, general contractor procurement, environmental consultants, construction/project management consultant services, and construction costs.

All applications must demonstrate a documented direct or indirect tieback to the 2021 or 2023 disasters. Unless authorized by HRD, minimum and maximum awards per eligible project under the PFR program are as follows:

2021 Disaster:

Minimum Award: \$300,000

Maximum Award: \$5,000,000

2023 Disaster:

Minimum Award: \$300,000

Maximum Award: \$10,000,000

CDBG-DR activities must address a direct or indirect impact of the 2021 and/or 2023 disaster in a Presidentially declared major disaster area for which funding was allocated. A disaster-related impact can be addressed through any eligible CDBG activity. An activity that promotes resilience and mitigates against future extreme weather events represents a tie-back to the disaster.

Direct property impacts may be demonstrated by providing damage assessments, insurance claims, FEMA Project Worksheets outlining impacts and needs, and before-and-after photos.

Indirect impacts include but are not limited to photos, impact reports or assessments, associated data, news articles referencing impact on the project site, community input and public feedback, government-issued plans that recommend disaster mitigation for disaster impacts, reports of shelters exceeding capacity during a disaster, etc.

Damage or repair estimates are often the most effective tool for demonstrating physical losses as a result of the disaster. For economic or other non-physical losses, post-disaster analyses or assessments may best document the relationship between the loss and the disaster. The tieback to the disaster must be evidenced in every activity file.

1.3 Award and Contract Procedure

Once NOFA applications have been scored and ranked, award letters will be sent to the selected applicants. These award letters will detail the documents needed to receive an approved and executed subrecipient agreement. Subrecipient agreements will be approved in two phases. The initial subrecipient agreement must follow all procurement standards found in 2 CFR part 200.318-327 and will include a budget to complete the following predevelopment items:

Procurement of an owner's representative/construction management consultant

Owner's representatives are expected to act on behalf of the subrecipient in all procurement and contractual agreements. Owner's representatives must have construction project management experience and knowledge of evaluating and managing federally funded construction projects. If no owner's representative is contracted, the subrecipient must provide documentation demonstrating it has an internal staff member with the knowledge and capacity to manage the project. A waiver to not contract an owner's representative must be approved by HRD. HRD may recommend the use of an owner's representative that has been engaged by the City through a separate procurement process to perform these activities.

Completion of a Capital Needs Assessment (CNA), with the assistance of the owner's representative, that shows the scope of work required to comply with the minimum standards included in the HRD Emergency Shelter Standards document (found at the end of this NOFA). The CNA must also indicate the ability of the project to incorporate as many of the preferred shelter standards found in the HRD Emergency Shelter Standards document as possible.

Procurement of an architect, with the assistance of the owner's representative, to complete drawings required to develop the project scope and create a contractor bid package

Procurement of environmental consultants, with the assistance of the owner's representative, associated with obtaining environmental clearance
Procurement of a contractor, with the assistance of the owner's representative, to complete the project construction

Note: Environmental review is required for predevelopment costs as defined by 24 CFR Part 58.36(6), "including legal, consulting, developer and other costs related to obtaining site options, project financing, administrative costs and fees per loan commitments, zoning approvals, and other related activities which do not have a physical impact." No construction or Choice Limiting Actions as defined in 24 CFR Part 58.22 will occur under the predevelopment phase of the project. A second environmental review must be completed once a complete scope of work is established for the rehabilitation project at the Site. The environmental review includes an appropriate Certification signed by the Certifying Officer or the Authority to Use Grant Funds (AUG) from HUD is received for the entire scope of construction work. This Certification or AUGF must be received prior to increasing funding or amending agreements with the subrecipient to allow for construction costs for rehabilitation activities.

Upon completion and approval of predevelopment items, HRD will review the proposed construction scope and budget. If approved, HRD will then draft an amendment to the subrecipient agreement modifying the project scope to a scope of work that HRD authorizes to proceed with a budget amount consistent with the approved project scope. This phase is expected to include the following items:

Unreimbursed eligible and approved predevelopment costs

Construction costs

Awarded subrecipients will receive a Notice to Proceed to begin both the predevelopment and construction phases. Project costs incurred before receiving a Notice to Proceed are at risk of not being eligible for reimbursement and may jeopardize the City's ability to fund the project.

1.4 Program Guidelines

Successful applications will consider the following expectations and guidelines related to requesting funding for public facility rehabilitation:

CDBG-DR projects must meet a national objective as defined at 24 CFR 570.208. This program typically funds projects that qualify for the Low/Moderate Income Area Benefit (LMA) or the Low/Moderate Income Limited Clientele (LMC) National Objectives.

Projects funded through the program will be required to address the remaining direct and indirect impacts from the 2021 & 2023 severe storms.

Projects shall meet the HRD Emergency Shelter Standards as informed by a Capital Needs Assessment.

Proposed project scopes should not include any deviations from these standards unless authorized by HRD.

No work can commence until the subrecipient agreement is fully executed and a Notice to Proceed is issued by HRD.

All architectural renderings must be completed and signed off by a State of Michigan licensed architect and approved by the City of Detroit.

All contracted services (environmental/architectural/construction) must adhere to federal procurement standards, found at 2 CFR 200.318-327.

The subrecipient will obtain a **minimum of three bids** prior to the selection of a general contractor or subcontractor. A copy of the bid tabulation and procurement is required to be furnished to HRD by the subrecipient. A firm-fixed-price contract will be required for the selected general contractor.

The procured contractor will be required to complete and submit an AIA 305 form for review and approval by HRD staff.

All work must be performed by a licensed and bonded contractor.

City permits will be obtained for all work performed, and the cost of permitting will be included within the applications.

The subrecipient will pass all required City inspections related to any public facility improvements or new construction that is funded through this solicitation. Proof of inspection certification will be required prior to utilizing any renovation or new construction to benefit clients identified within this application.

Any renovation funded through this solicitation will be compliant with the Americans with Disabilities Act (ADA).

The successful subrecipient will agree to a lien placed on the property for five years from the date of project completion and comply with the Continued Use Requirement/Change of Use Requirements that are a condition of this NOFA (see Section 1.6).

The subrecipient must provide a comprehensive project plan and budget that details the predevelopment and construction costs and be able to demonstrate that all other project financing has been secured at the time of

application. Proof of documentation showing that financing and funds are secured is required.

The City will consider reimbursing for pre-award costs incurred prior to the date of the application. These are typically predevelopment costs only.

The subrecipient will provide the essential public facilities in LMI and socially vulnerable communities, protect life and property, and address the needs of people at risk of homelessness.

The proposed activity is feasible.

Disaster Tie-back

Projects funded through this program will be required to address the remaining direct and indirect impacts of the 2021 and/or 2023 disaster in the HUD-identified Most Impacted and Distressed Area (MID). For this NOFA, the MID is considered to be any project located within the boundaries of the City of Detroit.

Direct impacts are the physical or structural impacts caused by the disaster, such as the destruction of facilities from flooding.

Indirect impacts refer to the non-physical disaster-related impacts, such as service interruption. Applicants can provide a narrative for how the community would be affected should no action be taken to repair the damaged facilities.

Documentation can also be provided, such as photos, damage assessments, FEMA Project Worksheets, or excerpts from the local plan identifying the project as a priority.

Mitigation Projects

Projects that address risks from future potential disasters that do not have a tie-back to the 2021/2023 flooding events are still eligible, with the integration of mitigation measures and strategies included in the project. The Disaster Relief Supplemental Appropriations Act requires HUD to set aside 15 percent of disaster recovery grants for disaster mitigation activities in any allocation of CDBG-DR funds for unmet needs.

Through this program, the City of Detroit will identify how its proposed use of the CDBG-DR Mitigation set-aside will meet the definition of mitigation activities, address the current and future risks as identified in the mitigation needs assessment found in the [CDBG-DR Action Plan](#), ensure that proposed activities are CDBG eligible activities, and meet a national objective.

The Public Facilities Rehabilitation – Emergency Shelter Program focuses on projects that benefit the community as a whole and will mitigate, eliminate, or reduce the loss of life or property in the face of current and future natural hazards. The program is designed to promote sound, sustainable, long-term recovery and projects that account for the unique hazards, opportunities, people at risk of homelessness, and disaster impacts within impacted neighborhoods. The focus of the program is on projects that will mitigate flood damage by improving sewer and water systems, and projects that will make the communities more resilient through projects such as enhancements of public facilities.

Applications will be required to describe the data and/or planning analysis they will use in their evaluation of hazard risk, including climate-related natural hazards.

Applicants must identify mitigation measures, including the following examples:

Incorporating resilient construction standards

Using resilient building materials and technology

Elevating facilities

Use of more renewable energy technologies

Utilization of backup power for critical facilities

Integration of open space or use of nature to manage flooding

Resilience Performance Metrics

HUD requires grantees to establish resilience performance metrics for each activity that constructs, reconstructs, or rehabilitates residential or nonresidential structures

As part of the application process, Subrecipients will work with the City of Detroit to develop resilience performance metrics for each applicable activity. The resilience performance metrics will include a description of the projected risk from natural hazards to the project/service area, identification of the mitigation measure that will address the risk, and an assessment of the quantifiable benefit of the project's resilience measures through verifiable data.

Tracking and reporting resilience performance metrics will be a required activity included within the terms of the

Subrecipient Agreement.

Applicants should identify potential resilience metrics, including:
Number of public facilities constructed or reconstructed
Number of residents protected from future flooding

The benefit of each activity should be a quantifiable metric that illustrates how the resilience measure is expected to improve outcomes compared to conditions if the activity were not implemented. Awardees will work with the City of Detroit to ensure the metrics selected are feasible and meet HUD requirements.

1.5 Program Timeline

PFR NOFA Timeline	
NOFA Release	September 17 th , 2025
Virtual Pre-Application Conference	September 22 nd , 2025 @ 10AM EST
Applications Due	October 17 th , 2025 @ 3PM EST
Virtual Public Recording of Applications	October 20 th , 2025 @ 10AM EST

1.6 Continued Use Requirement/Change of Use Requirements

Any projects receiving funding through this NOFA must continue to be operated by the organization in the manner described in the application. Any change in the use of the property within five (5) years after closeout of the grant project must be made in accordance with the standards provided in 24 CFR 570.505.² If the facility or real property cannot meet a national objective during the five-year continued use period, the grant must be repaid to the City of Detroit. In the event of a possible change of use in the funded facility, the subrecipient must contact the Housing and Revitalization Department prior to taking any action. This requirement will be captured in any executed agreement resulting from this NOFA.

1.7 Record-Keeping and Reporting Requirements

Subrecipients will be required to maintain accurate records documenting that the targeted populations and/or areas are being served by the project and to provide the City with quarterly reports demonstrating compliance with this requirement. Subrecipients will be required to maintain this information beginning from the date of the executed agreement through five (5) years from the date of project completion and shall provide this information to the City upon request.

1.8 Additional Federal Requirements

In addition to the record-keeping and reporting requirements outlined above, CDBG-DR-funded activities are also subject to other federal requirements. Below is a summary of additional federal requirements that may also apply to each proposed project. Subrecipients shall be solely responsible for complying with these and any other applicable federal requirements and shall be responsible for obtaining all information necessary to satisfy these requirements.

Duplication of Benefits (DOB) Review

The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), as amended, 42 U.S.C. § 5121 et seq., prohibits any person, business concern, or other entity from receiving Federal funds for any part of such loss as to which he/she has received financial assistance under any other program, from private insurance, charitable assistance, or any other source.

City of Detroit will assess assistance from other federal, state, local, or other sources available to applicants for the same purpose as the applicant's project and determine if any of the assistance is duplicative. The purpose of other assistance may apply to the entire project or a portion of the project. A duplication of benefits occurs when assistance for the same purpose has been received or will be received, and applicants must agree to notify City of Detroit if they are awarded or receive additional assistance for the same purpose after they apply to the program. Awarded subrecipients will be required to execute a subrogation agreement, through which the subrecipient agrees to repay any duplicative assistance received after program award. City of Detroit will review the applicant's duplication of benefits section and all attachments, using the Duplication of Benefits Checklist to determine the value of the applicant's duplicative assistance.

² The definition of project closeout is the administrative closeout of the project.

Any assistance determined to be duplicative will be deducted from the calculation of the applicant's total need prior to moving forward for application scoring.

City of Detroit will notify applicants through the system of record when their DOB review is complete. Applicants will have 5 business days to confirm the DOB amount is accurate or request an adjusted DOB calculation based upon additional verifiable information or documentation.

Fair Housing and Equal Opportunity

Discrimination on the basis of race, color, national origin, religion, disability, sex, height, weight, familial status, source of income, age, sexual orientation, and gender identity is prohibited.

Section 504 Regulations and Handicapped Accessibility

A recipient is obligated to operate each non-housing program or activity so that, when viewed in its entirety, the program or activity is readily accessible to and usable by persons with disabilities.

Debarred, suspended, and ineligible contractors and subrecipients

CDBG-DR funds cannot be provided to debarred, suspended, or ineligible contractors, subcontractors, or subrecipients. Subrecipients and contractors will be required to register with www.sam.gov and must not be debarred from receiving federal funds.

Lead-Based Paint

CDBG-DR rehabilitation and construction activities must comply with 24 CFR Part 35 and Section 401(b) of the Lead-Based Paint Poisoning Prevention Act

Conflict of Interest

CDBG-DR recipients and subrecipients must comply with procurement requirements found at 2 CFR 200.317-326; with any other applicable conflict of interest provisions.

Acquisition and Relocation

Acquisition, rehabilitation, and/or demolition activities may be covered under the Uniform Relocation Act and/or Section 104 (d) of the Housing and Community Development Act.

Federal Prevailing Wages and Federal Labor Standards Provisions

Construction projects assisted in whole or in part with CDBG-DR funds must be carried out in compliance with the federal Davis Bacon and Related Acts. Extensive labor standards requirements must be followed.

Additional detailed information can be found in the HUD 4010 Federal Provisions document attached to this NOFA, including the current federal prevailing wage requirements.

Women and Minority-Owned Business

The City of Detroit encourages applicants to provide opportunities for minorities, women, and emerging businesses.

Environmental Review

All projects that receive funding through this NOFA are subject to the HUD environmental review requirements (24 CFR 58) and all properties acquired with CDBG funds must be environmentally cleared by the City prior to acquisition. The project must satisfy the HUD environmental review requirements before the City may commit funds to the project. Upon application for assistance through this NOFA, the Developer and all project participants (i.e. public or private non-profit or for-profit entities, or any of their contractors) agree to the following stipulations: (1) that the provision of any funds to a project is subject to the findings of the environmental review, and (2) **that neither the Developer nor any project participant shall undertake any "choice limiting actions" until the environmental review process is complete.**

A "choice limiting action" shall include any of the following: (1) acquisition of any real property associated with the project, (2) entering into a binding purchase agreement for any real property associated with the project, (3) any improvements to the property or properties associated with a project, (4) any rehabilitation of an existing structure located on property associated with the project, (5) any construction of a new structure located on property associated with the project, or (6) demolition of any existing structure located on property associated with the project.

Section 2: Program And Application Requirements

Funding will be awarded based on the quality and quantity of applications received as determined through a scoring a review process. Please note, CDBG-DR grants are administered by the City of Detroit Housing and Revitalization Department on a reimbursement-only basis.

Disclaimer: The City of Detroit reserves all rights not expressly stated in this NOFA, including making no awards, awarding partial funding, or increasing funding based on budget availability, and negotiating with any applicant regarding the funding amount and other items of any contract resulting from this NOFA. Eligible projects awarded through another City of Detroit competitive process may also be awarded these CDBG-DR funds.

2.1 Program Year Timeline

Nonprofit organizations receiving awards may not obligate or expend any funds until all contract agreements are in place, fully executed, and a written Notice to Proceed is issued by HRD. Failure to comply with this procedure could result in voiding any awards issued.

Subrecipient grant terms will not exceed 24 months from the date of the contract being executed. A request for additional time may be considered on a case-by-case basis and must be approved by HRD and City Council.

2.2 Subrecipient Expectations and Requirements

Nonprofit organizations that plan to meet the above requirements are eligible to apply. In order to complete a HUD national objective, all subrecipients are required to identify beneficiary data. Emergency shelter providers will need to record all client-related data and activity using the CoC-established HMIS standards. Subrecipients must also comply with all requirements in their subrecipient agreements, internal policies and procedures, and the City of Detroit's Public Facility Rehabilitation CDBG-DR program policies and procedures.

2.3 Eligible and Ineligible Items for Public Facility Rehabilitation Projects

It is important to note those activities and expenses that are eligible and those activities and expenses NOT deemed eligible for reimbursement under the Public Facility Rehabilitation NOFA. The table below illustrates eligible versus non-eligible CDBG-PFR costs:

Eligible Activities	Ineligible Activities	Other Eligible Costs
Material; Labor; Permits Engineering; Architects Asbestos Survey Environmental studies, reports	General government expenses; Political activities; Purchase of equipment; Construction equipment; Fire protection equipment; (fire suppression systems are eligible) Furnishings and personal property; Operating and maintenance expenses; New housing construction; Income payments	Additional line items, including soft costs associated with eligible activities – must be approved by HRD

The nonprofit or entity must demonstrate they are an active 501c3 Corporation and have been registered with the State of Michigan Licensing and Regulatory Affairs for at least twelve (12) months prior to the submission of the application for CDBG-DR assistance and may not be presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in federal programs, as indicated by System for Award Management (www.sam.gov)

2.4 Application Review Criteria

Application Section	Total Points Possible
Organizational Experience (please see section 3.3.1 for scoring criteria)	20
Financial Capacity (please see section 3.3.2 for scoring criteria)	20

Project Specifics (please see section 3.3.3 for scoring criteria) <i>Note: HRD reserves the right to award additional points in addition to the standard points for ideal standards included in the project scope.</i>	60
Standard Points Possible	100 points

2.5 Application Requirements

In order for an application to be accepted, the application MUST:

Meet threshold criteria

Include the submission of section 3 of this application

Include all applicable Forms and Attachments

Meet the required deadline of **3PM EST on Friday, October 17th, 2025.**

Please note: The City will only accept one application per organization. Applications that do not meet threshold criteria or that do not meet the deadline will not be accepted or considered.

2.6 Submission Method

Applicants must upload attachments per the following instructions. Missing attachments will receive zero points.

Each attachment must be uploaded individually.

Each attachment must be marked with the form or attachment number and document title as requested.

Each form and attachment's file name must follow the same naming convention.

2.7 Application Deadline

2025-2026 Public Facility Rehabilitation NOFA Application Submission Deadline is **3:00 pm on Friday, October 17th, 2025**, and must be submitted via Oracle. Applications will not be accepted after this time and date. Mailed, faxed, or emailed copies of the application will not be accepted.

An Oracle tutorial on this process can be found [here](#). Additional instructions for Oracle can be found on the City's website at <https://detroitmi.gov/supplier>.

Applications must be uploaded into ORACLE and time-stamped, no later than **3:00 pm on Friday, October 17th, 2025**. Late submissions will not be accepted.

A Public Recording of submitted applications takes place via Zoom at **10:00 am on Monday, October 20th, 2025**. The link to the Zoom virtual meeting is: [Public Recording NOFA 186079 PFR](#)

Completeness

The City will not contact organizations for missing information. All applications meeting threshold will be reviewed and scored "as is." Missing and/or incomplete information will negatively impact the overall application score and/or result in total disqualification of an application.

Please review this NOFA **prior** to submitting questions. The City will provide one Pre-Application conference upon release of the NOFA. The virtual conference will be held on **10:00 am on Monday, September 22nd, 2025** via Microsoft Teams at the following link: [NOFA 186079 Pre-Application Meeting](#)
Procurement and Non-Discrimination Notice

The City Office of Contracting and Procurement solicitations meets 2 CFR 200.320 Methods for Procurement by competitive applications. The City does not discriminate on the basis of race, color, creed, national origin, age, disability, height, weight, sex, or sexual orientation. Complaints may be filed with the Civil Rights, Inclusion, & Opportunity Department, Suite 1240 Coleman A. Young Municipal Center Detroit, MI 48226 (313) 224-4950, crio@detroitmi.gov.

Grievance, Appeals, and Termination Procedures

The City may terminate awards or subrecipient contracts at any time if subrecipients violate program requirements as outlined in this NOFA, the City's policies, and/or the subrecipient agreement. The termination will follow due process to protect subrecipients' rights based on the City's Grievance and/or written policies, subject to the department director's approval.

Section 3: Application

3.1 Cover Sheet

Applicant Organization Legal Name:

Indicate current name(s) and any other previously used name(s):

Applicant Mailing Address:

Sam.Gov Entity ID:

Michigan LARA ID:

Contact Person:

Telephone Number:

Email:

Website:

Is this Organization a 501(c) (3)? ☐Yes ☐No

Is your organization a faith-based entity? ☐Yes ☐No

Number of employees:

Number of employees that reside in the city of Detroit:

Facility Age:

Date of last major renovation:

Facility Square Footage:

Amount of CDBG-DR funds requested:

Total Project Cost:

Amount of CDBG/CDBG-DR funds currently awarded and outstanding (for this project or other projects controlled by the organization):

Identify Qualifying Disaster (can select more than one if documentation is provided)

2021 Severe Storms and Flooding ☐

2023 Severe Storms and Flooding ☐

Mitigation (no disaster tieback) ☐

Attestations

I have read the posted Notice of Funding Opportunity document in its entirety, which contains details on program eligibility, requirements, scoring, anticipated timeline, and applicable federal regulations.

☐Yes

I have disclosed all other funding received from other sources related to reimbursement of costs associated with the proposed project.

☐Yes

I have read the environmental review requirements and understand that environmental consultant work may be required prior to receiving City funding. These costs may be eligible for reimbursement upon contract execution. I attest that neither the Developer nor any project participant shall undertake any "choice-limiting actions" until the environmental review process is complete.

☐Yes

No Federal, state, or local elected official, nor any member of the City of Detroit Planning Commission or

employee of the Housing & Revitalization Department, nor any corporation owned or controlled by such person, shall be allowed to participate in any share or part of this contract or to realize any benefit from it. This provision shall be construed to extend to this contract if made with a corporation for its general benefit.

☐ Yes

No member, officer, or employee of the City of Detroit Housing & Revitalization Department, no member of the governing body of the City of Detroit or any other local government, and no other public official of such locality or localities who exercises any functions or responsibilities with respect to the project, shall, during his or her tenure, or for one year thereafter, have any interest, direct or indirect, in this contract or the proceeds thereof.

☐ Yes

To the best of my (our) knowledge and belief, all information in this application is true and correct. The governing body of the Applicant has duly authorized this application and if awarded, the Applicant will comply with all applicable program requirements according to the funding source. The Applicant agrees to adhere to all contracting and hiring requirements of the Federal, State, and City government.

☐ Yes

Name

Date

3.2 Threshold Requirements

1. **Is the organization tax exempt, 501(c)(3), 501(c)(19), etc.?** ☐ Yes ☐ No
(Attach copy as Attachment #3.2.1: NONPROFIT DESIGNATION)

If yes, give date exemption granted: _____

Does the organization have a federal tax I.D. number? _____

2. **Does your organization have unresolved audit findings and tax issues?** ☐ Yes ☐ No
If yes, explain and attach supporting documentation as
Attachment #3.2.2: Audit and Tax Findings

Has the Certification form been signed (found at end of document)? ☐ Yes ☐ No
Attach copy as Attachment #3.3.3: Certification

4. **Did your organization submit its most recent Michigan Annual Non-Profit Report? Note: Annual reports must be filed no later than October 1st at www.michigan.gov/fileonline** ☐ Yes ☐ No
Attach copy as Attachment #3.2.4: MICHIGAN ANNUAL REPORT

5. **Did your organization submit Articles of Incorporation?** ☐ Yes
☐ No
Attach copy as Attachment #3.2.5: ARTICLES OF INCORPORATION

6. **Did your organization submit a Certificate of Good Standing?** ☐ Yes ☐ No
Attach copy as Attachment #3.2.6: CERTIFICATE OF GOOD STANDING

7. **Does your organization have site control?** Attach evidence of site control, a long-term lease (10 years with a minimum of 8 years remaining), or a pending purchase agreement. Attach as Attachment #3.2.7: Site Control ☐ Yes ☐ No

8. **Does your organization have a current BSEED Certificate of Compliance for each shelter location you are applying for funding?** ☐ Yes ☐ No
(Attach a copy as Attachment #3.2.8: Certificate of Compliance. "No" responses should clearly show how the project scope addresses all BSEED compliance deficiencies.

9. **Project Qualification:** Does the project location qualify as an emergency shelter public facility per the description below?
Emergency Shelters are defined as a facility that provides temporary overnight lodging for people experiencing

homelessness, which can include families with minors, single adults, and youth aged 18-24. For the purposes of this NOFA, emergency shelters providers must accept referrals through Detroit's coordinated entry system, CAM as well as enter data into the Homeless Management Information System (HMIS) data system or a comparable data base if serving survivors of domestic violence.

If yes, what is the target population of this shelter? Describe how bed vacancies are reported and filled each day. Outline how client level data is entered into HMIS within a 48-hour timeframe.

Response:

10. Disaster Recovery Tieback: Does the proposed project respond to a direct impact resulting from the 2021/2023 flood event that was not funded from another source? Does the proposed project respond to an indirect impact resulting from the 2021/2023 flood event that was not funded from another source? Does the proposed project integrate mitigation measures and increase resiliency in the community in preparation for a future disaster? Does the applicant confirm which disaster the project ties back to?

Response:

3.3 Narrative Questions

All applicants must respond to the items below. Each response must be 200 words or fewer; failure to do so will result in a reduction in points. Each attachment will count as 1 point towards the question total, if applicable.

Responses may be typed in the space provided or attached as a separate document.

3.3.1 Organizational Experience

Provide background on your organization's history and experience serving Detroit. Outline **ALL** services provided by your organization. Will the current service population change as a result of this award? (4 points)

Describe the strength of your Board of Directors, including community representation. In addition, are there any current vacant positions on your Board of Directors? If so, what is your plan and timeline to fill those vacancies? In addition, submit the most current **Organizational Chart as Attachment #3.3.1.B** (4 points)

Using the most current demographic information, please describe the Detroit residents currently served at the project location, including the total number, age, race/ethnicity, veteran status, and any other pertinent demographic data. (4 points)

Describe your organization's prior experience in grant administration in the last five (5) years. Specify the organization's grant funding source and type (i.e., CDBG, ESG, ARPA, Foundation), year(s) awarded, total amount awarded in the last five (5) years, objectives, and outcomes. (4 points)

Address the extent to which the project benefits vulnerable populations and communities. (4 points)

3.3.2 CAPACITY AND FEASIBILITY

Describe your organization's fiscal management process, including financial reporting, accounting systems used, and audit requirements. Please describe how these comply with the requirements found in 2 CFR 200.302 "Financial Management". (4 points)

Briefly describe the accounting procedures that would support sufficient segregation of duties concerning potential City funding. This can include receipting, expense approvals, ledger postings, and account reconciliations. Please describe how these comply with the requirements found in 2 CFR 200.303 "Internal Controls". (4 points)

Describe the policies and procedures your organization has in place to ensure the timely submission of monthly draw requests as well as compliance with CDBG regulations. **Submit a copy of Policies and Procedures as Attachment #3.3.2.C.** (4 points)

PFR project draws are funded on a cost reimbursement basis. Briefly describe the financial capacity and provide proof of cash on hand to be able to pay for project costs while waiting for approval of City reimbursement. **Complete and submit Form 1.** (4 points)

If the organization has expended more than \$750K in federal funds within the last year, submit documentation of the completed single audit as **Attachment #3.3.2.E** with the application submission. (4 points)

3.3.3 Project Description

Project Name and Location: Council District: Census Tract:
Describe the proposed project in detail, including all work that is to be performed and how the scope will address the minimum shelter standards and any ideal shelter standards. Additional points will be awarded for project scopes that incorporate ideal shelter standards. Provide a Scope of Work as Attachment #3.3.3.A. (10 points)
Describe how the project incorporates mitigation measures that address current and future risks. Select the mitigation measures that the project will address. (10 points) Incorporating resilient construction standards Using resilient building materials and technology Use of more renewable energy technologies The utility of backup power for critical facilities Integration of open space or use of nature to manage flooding Improve the resiliency of the community by increasing capacity of the shelter system Other:
Describe how the project will incorporate resiliency measures to minimize the impact of future disasters. (10 points) Select the resilience metrics being calculated/tracked for the project. Number of public facilities constructed or reconstructed Number of clients protected from future flooding
Submit cost estimates from a licensed contractor(s) that detail each line item proposed and the total estimate of the entire project. The specific cost associated with each ideal standard item must be provided. Include all additional funding sources with applicable commitment letters. Please complete and submit the included HRD-PFR budget template as Attachment #3.3.3.D. ³ (5 points)
Has a Capital Needs Assessment been conducted on the proposed structure that considers the HRD Emergency Shelter Standards? If so, please submit as Attachment #3.3.3.E. If a Capital Needs Assessment is currently being developed, please provide details. (10 points)
Has a Phase 1 Environmental Site Assessment been completed in the last two years? If so, please submit as Attachment #3.3.3.F. (5 points)
Explain how the building currently complies with ADA requirements and list out any current hazardous conditions or barriers that prevent ADA compliance. How will the proposed project remove ADA barriers to the building? Submit the most recent inspection by the Fire Marshall as Attachment #3.3.4.G (1). (5 points)
Section 3 Requirements In order to meet the Section 3 requirements, the applicant agrees to comply with HUD's regulation, 24 CFR Part

³ Applicants who are awarded CDBG funds must be able to demonstrate federal procurement standards have been met.

75, and the Housing and Revitalization Department (HRD) Section 3 policy and guidelines. The applicant must submit a completed and signed (1) Section 3 Intent to Comply and (2) Section 3 Plan with the applicant's NOFA package. **Attachments #3.3.3.H(1) and #3.3.3.H(2)** (5 points)

If the applicant has Section 3 experience, provide a detailed explanation of past verifiable strategies used for hiring and training low- and very low-income individuals and contracting with Section 3 businesses, and indicate if the strategies were successful or not.

Additional information and the required documents can be found at

<https://detroitmi.gov/departments/housing-and-revitalization-department/hud-programs-and-information/section-3-program>

FORM 1

Cash on Hand Certification

The City makes every effort to expedite reimbursement of invoices, but the process can be delayed by many factors. Applicants must have adequate funds available for timely payments to contractors and vendors. The City requires that an applicant organization seeking funding under the Public Facility Rehabilitation NOFA must certify that they have cash on hand to cover three (3) months of project expenses.

In signing this form, I certify that _____ (insert applicant organization name) has three (3) months of project expenses in the event that reimbursement is delayed from the City.

Name: _____

Title: _____

Date: _____

CERTIFICATIONS

To be signed and notarized by an authorized representative of the Board of Directors

I certify that I have read the "HUD Final Rule: Revised Church and State Regulations" as printed in the appendices, and that, if funded, all proposed activities shall be carried out in full compliance with the requirements of the U.S. Constitution regarding separation of church and state, and I commit the sponsoring organization to full compliance.

I certify that I have read the "HUD Conflict of Interest Regulations" as printed in the appendices, and that, if funded, all proposed activities shall be carried out in full compliance with HUD Conflict of Interest Regulations, and I commit the sponsoring organization to full compliance.

I certify that the Board of Directors of this organization is not majority family controlled or related by blood and/or marriage.

I certify that I have read and understand the notices and warnings listed above.

I certify that the information presented in this application is true.

I certify that the Board of Directors has authorized the submission of this CDBG-DR application.

I certify that no persons or organizations associated with this CDBG-DR application are on the HUD Debarment List.

I further certify that I have been authorized by the Board of Directors to execute these certifications on our behalf.

Name: _____ Title: _____

Date: _____

HUD FINAL RULE: REVISED CHURCH AND STATE REGULATIONS

Pursuant to Title I of the Housing and Community Development Act of 1974, as amended, and the implementing CDBG regulations at 24 CFR 570.200(j) dated September 30, 2003, the Sponsoring Organization agrees that, if awarded CDBG funds for eligible activities: a) It will not discriminate against any person applying for, or seeking to participate in, CDBG funded activities on the basis of religion and will not limit such services or give preference to persons on the basis of religion or religious belief; b) It will provide no religious instruction or counseling, conduct no religious worship or services, and engage in no religious proselytizing, in the provision of funded CDBG activities; c) If the organization conducts any religious activities, such activities must be offered separately in time or location from the funded CDBG activities and participation of beneficiaries of CDBG funded activities in any such religious activities must be wholly voluntary; d) If CDBG funds are received for public service activities, minor maintenance repairs may be made to the facility space in which public services are to be provided only in proportion to the CDBG funding allocation for the entire facility and to the extent to which the facility is used for secular, public service eligible purposes. Such space must not be a sanctuary, chapel or other room(s) used as a principal place of worship or for inherently religious activities; e) No CDBG funds may be used to improve, acquire, construct, rehabilitate, repair or maintain a sanctuary, chapel or other rooms that a CDBG-funded religious congregation uses as its principal place of worship or for inherently religious activities. However, if CDBG funds are awarded for public facility rehabilitation, and space

other than provided above is used, the CDBG funds may be used for rehabilitation of structures only to the extent and proportion that those structures are used for conducting eligible CDBG activities. CDBG funds may not exceed the cost of those portions of the rehabilitation that are attributable to eligible CDBG activities in accordance with cost accounting requirements of OMB Circular A-122.

HUD Conflict of Interest Requirements

The City of Detroit, Housing and Revitalization Department has revised HUD's conflict of interest clause in all City of Detroit contracts. Please be aware, these requirements will apply if you are awarded a contract with the City of Detroit.

The Contractor warrants that its participation in this contract will conform to the requirements all of the applicable Community Development Block Grant regulations including, Section 570.611 of Part 200 Title 24 of the Code of Federal Regulations, and further warrants that such participation will not result in any organizational conflict of interest. Organizational Conflict of interest is defined as a situation in which the nature of work under this contract and the Contractor's organizational, financial, contractual or other interests are such that:

Award of the contract may result in an unfair competitive advantage; or
The Contractor's objectivity in performing the contract work may be impaired.

In the event the Contractor has an organizational conflict of interest as defined herein, the Contractor shall disclose such conflict of interest fully in the submission of the application and/or during the life of the contract.

The Contractor agrees that if after award he or she discovers an organizational conflict of interest with respect to this contract, he or she shall make an immediate and full disclosure in writing to the Director of the Housing and Revitalization Department, which shall include a description of the action which the Contractor has taken or intends to take to eliminate or neutralize the conflict. The Housing and Revitalization Department may, however, terminate the contract if it is in best interest of the City.

In the event the Contractor was aware of an organizational conflict of interest before the award of this contract and intentionally did not disclose the conflict to the Housing and Revitalization Department (HRD) may terminate the contract for default.

The provisions of this clause shall be included in all subcontracts and consulting agreements.

No federal, state, or local elected official nor any member of the City of Detroit City Planning Commission or their staff or employee of the Housing and Revitalization Department nor any corporation owned or controlled by such person, shall be allowed to participate in any share or part of this contract or to realize any benefit from it. This provision shall be construed to extend to this contract if made with a corporation for its general benefit.

No member, officer, or employee of the City of Detroit, Housing and Revitalization Department, no member of the governing body of the City of Detroit or any other local government, and no other public official of such locality or localities who exercises any functions or responsibilities with respect to the program/project, shall, during his or her tenure, or for one year thereafter, have any interest, direct or indirect, in this contract or the proceeds thereof.

The Housing and Revitalization Department reserves discretion to determine the proper treatment of any conflict of interest disclosed under this provision.

City of Detroit

Housing and Revitalization Department

CDBG-DR (Disaster Recovery) Duplication of Benefits Certification Form

The City of Detroit shall ensure there are adequate procedures in place to prevent any duplication of benefits as required by section 312 of the Robert T. Stafford Disaster Relief and Emergency Assistance 1 Act (42 U.S.C. 5155) and in accordance with section 1210 of the Disaster Recovery Reform Act of 2018 (division D of Public Law 115-254; 132 Stat. 3442), which amended section 312 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5155).

Duplication of Benefits occurs when a beneficiary receives assistance from multiple sources for a cumulative amount that exceeds the total need for a particular recovery purpose. The amount of the duplication is the amount of assistance provided in excess of need. The Stafford Act requires a fact- specific inquiry into assistance received by each person, household, or entity.

☐ I/We, _____, affirm (insert applicant name) DID NOT receive benefit from any other federal disaster relief/recovery programs (i.e. FEMA, SBA, Insurance). (NO FURTHER ACTION)

☐ I/We, _____, affirm (co-applicant name) DID NOT receive benefit from any other federal disaster relief/recovery programs (i.e. FEMA, SBA, Insurance) for the exact SAME expenses being requested from the City of Detroit or its Subrecipients.

By executing this Certification, Applicant(s) acknowledge and understand that Title 18 United States Code Section 1001: (1) makes it a violation of federal law for a person to knowingly and willfully (a) falsify, conceal, or cover up a material fact; (b) make any materially false, fictitious, or fraudulent statement or representation; OR (c) make or use any false writing or document knowing it contains a materially false, fictitious, or fraudulent statement or representation, to any branch of the United States Government; and (2) requires a fine, imprisonment for not more than five (5) years, or both, which may be ruled a felony, for any violation of such Section.

Applicant Signature

Date

Co-Applicant Signature

Date

I/We, _____, affirm the following dated this the _____ day of _____, 20____:

List amount and source for ALL Federal and/or State financial assistance received for disaster recovery or resiliency planning projects
I/We have received the following disaster recovery assistance funds from (List program(s)):

1 Source of Funding	2 Amount Awarded (\$)	3 Use of Funds	4 Verification of Award (✓) or (X)	5 Documentation Expenditure (✓) or (X)
a. FEMA				
b. Small Business Administration (SBA) Loan				
b. Insurance				
c. Private Funds				
d. _____				
Total				
Duplication of Benefits Total From Column 2 \$ _____: NOTES:				

HRD Emergency Shelter Building Standards

Shelter facilities are required to meet minimum standards to ensure the safety, dignity, and health of residents and staff. However, the applicant can request a waiver if they believe that the physical structure is not able to accommodate a specific minimum standard. Ideal standards reflect effective practices and design for resilience, efficiency, and mitigation for weather disaster events. Proposals that include ideal standards will receive additional points.

Note: These standards are meant as guidelines and do not supersede building codes or other regulations. All facilities must comply with Buildings, Safety Engineering, and Environmental Department (BSEED) requirements. Not all standards are eligible for Federal funding reimbursement.

Minimum Standards:

Organizations must have a current BSEED Certificate of Compliance. Any deficiencies found in a BSEED inspection must be addressed in the submitted scope of work. All major mechanical systems (electrical, HVAC, plumbing) must have an expected remaining effective life of at least 5 years.

Water & Sewer Maintenance

- Site grading is designed to channel water away from buildings
- Effective roof and surface drainage systems to prevent water pooling.
- The roof has an expected remaining effective life of at least 10 years
- Scoped sewers for proper drainage and identification of necessary upgrades
- Functional sanitary sewer connections or septic systems per local code.
- No active leaks resulting in standing water

Heating & Cooling

- Heating and cooling systems maintain interior temperatures between 68°F and 78°F
 - When air conditioning is not available or cannot be reasonably installed, other systems are in place to decrease temperatures.

Ventilation

- Operable windows or mechanical ventilation per code
- Exhaust fans in bathrooms and kitchens
- No visible mold or mildew

Bathrooms

- Adequate number of working showers and toilets in a ratio consistent with the occupancy standards of the building
- ADA-accessible stalls and fixtures
 - Privacy ensured by doors and partitions
 - Emergency lighting with battery backup
 - Surfaces that resist mold/mildew

Rooms/Structure

- Structurally sound walls and floors with no evidence of leaks or damage
- Safe ingress/egress routes for all rooms

- Sleeping space per occupant must comply with shelter building codes and fire marshal requirements.
- Must meet environmental compliance requirements

Fire Safety

- Compliance with all applicable standards/requirements (e.g., alarm system, fire extinguishers, smoke detectors, clearly marked exits) with current inspection certifications
- Fire suppression system in sleeping and common areas as required by BSEED
- Central fire alarm system with alerts for those with disabilities
- Fire-rated doors
- Alarms and emergency lighting with backup power systems

Lighting/Illumination

- Adequate lighting in all common and sleeping areas
- Exterior lighting at entrances and walkways

Security

- Lockable doors and windows

Water Supply

- Water supply available and free of contamination
- Hot and cold running water are available in kitchens and bathrooms

Garbage Disposal

- If present, garbage disposals are in good working condition
- Secure space for trash and food debris that prevents rodents and insects
- Hazardous and biohazard waste disposal processes are followed as required
-

Rodent/Pest Control

- Building is properly sealed (e.g., doors, windows, foundation cracks) to mitigate rodent access

Kitchen/Cafeteria

- Compliance with all applicable health code requirements
- Appliances are in place and are in good working order
- Cold and dry food storage is maintained at an appropriate temperature
- Surface area available for food preparation
- Adequate handwashing stations and food-safe surfaces

Ideal Standards

Organizations should strive to incorporate as many of these ideal standards as possible in the project scope with an emphasis on including HRD preferred ideal standards. Items with an asterisk are HRD preferred ideal standards. Ideal standards with estimated costs must be itemized in the project budget.

Water & Sewer Maintenance

- Backflow preventers and sump pumps with backup power*
- Stormwater management system (e.g., catch basins, rain garden)

Heating & Cooling

- Climate control systems are tied into a power backup system (e.g., generators, battery systems) for climate control during power outages.*
- Energy-efficient central HVAC

Electrical

- Backup generator*

Ventilation

- HEPA air purifiers in shared areas*
- Mechanical ventilation with air filtration

Bathrooms

- Individual showers with lockable doors*
- Family-accessible options

Rooms/Structure

- Flexible rooms for isolation or emergency repurposing*
- Disinfectant/ “heat rooms” for client belongings*
- Elevated construction or flood-resistant materials in risk zones
- Separate sleeping quarters for families and vulnerable individuals
- Quiet, private sleeping areas that reduce crowding stress
- Private meeting spaces for case managers and partner groups
- Indoor and outdoor recreational for daily use (e.g., gyms, living room-like space, library, art room, computer labs, courtyard, playground for family shelters)
- Secure storage space for client belongings

Lighting/Illumination

- Energy efficient lighting options (e.g., LED, motion sensors)*
- Whole building generator or backup power option*
- Light-dimming options in sleeping areas to promote rest*

Security

- Security camera coverage of entrances, exits, and public/common areas*
- Keycard or access-controlled systems

Water Supply

- Water purification or filtration system*
- On-site water storage for emergency supply

Garbage Disposal

- Recycling and compost options

Kitchen/Cafeteria

- Energy-efficient appliances*
- ADA-accessible layout for eating areas*
- Dining area that can accommodate all residents (staggered if needed)*
- Commercial-grade kitchen, including ventilation and fire suppression*
- Dedicated space for emergency food storage and preparation capacity (e.g., for shelter-in-place)
- Electrical outlets that allow for food storage options for households (e.g., apartment-style refrigerators, common-area refrigerators)

7.3 Exhibit D Cross Cutting Regulations

EXHIBIT D: CROSS CUTTING FEDERAL REGULATIONS

Listed below are cross-cutting federal regulations that may apply to your project. Please review the summaries below. Please note that these regulations are not all inclusive, and the City of Detroit may enforce other federal regulations. Questions regarding the cross-cutting federal regulations below may be directed to the City's Housing and Revitalization Department. It is the responsibility of the Contractor to read and understand these regulations and comply in all respects as required.

D.1 M/WBE

Qualified Minority-Owned Enterprises, Women-Owned Enterprises, Disadvantaged Business Enterprises, Veteran Owned Enterprises, and HUD Section 3 Certified Business Concerns are encouraged to submit proposals to City of Detroit for contracts and agreements funded through the Community Development Block Grant program.

Section 281 of the National Affordable Housing Act requires federal grantees to ensure contracting opportunities for minority and woman-owned businesses when federal funds. City of Detroit encourages that any contractor who receives a contract using federal funds to comply with this act. In accordance with Section 281 of the National Affordable Housing Act, applicants must take affirmative steps to use minority and woman-owned businesses for their funded activities. This means the contractor must make a good faith effort to hire minority and/or woman-owned businesses.

An MBE/WBE business meets one of the following:

1. A sole proprietorship, owned and controlled by a minority and/or woman; or
2. A partnership or joint venture controlled by a minority or woman in which 51 percent of the beneficial ownership interest is held by minorities or women; or
3. A Corporation or other entity controlled by minorities or women in which at least 51% of the voting interest and 51 percent of the beneficial ownership interest are held by minorities or women.

D.2 Section 3: Economic Opportunities for Low- and Very Low-Income Persons

Section 3 is a provision of the Housing and Urban Development (HUD) Act of 1968 that helps foster local economic development, neighborhood economic improvement, and individual self-sufficiency. The Section 3 program requires that recipients of certain HUD financial assistance, to the greatest extent feasible, provide job training, employment, and contracting opportunities for low- or very-low income residents in connection with projects and activities in their neighborhoods.

Applicants funded with HUD Community Development Block Grant Funds are required to meet the Section 3 provisions to the greatest extent feasible. Documentation will be required in order to verify compliance from the borrower. Please refer to the City of Detroit Section 3 Program for additional information on the local Section 3 requirements.

<https://detroitmi.gov/departments/housing-and-revitalization-department/hud-programs-and->

[information/section-3-program](#)

D.3 Fair Housing Act

The Fair Housing and Equal Opportunity, Office of Program Compliance, investigates complaints pursuant to Title VI of the Civil Rights Act of 1964 (Title VI). Title VI prohibits discrimination on the basis of race, color or national origin in programs and activities receiving Federal financial assistance. Complaints must be filed within 180 days of the alleged act of discrimination.

D.4 Americans with Disabilities Act

Title II of the ADA prohibits discrimination against persons with disabilities in all services, programs, and activities made available by State and local governments. The Department of Justice (DOJ) has coordination authority for the ADA in accordance with Executive Order 11250.

The DOJ regulations cover all State and local governments and extend the prohibition of discrimination in Federally- assisted programs established by Section 504 of the Rehabilitation Act of 1973 to all activities of State and local governments, including those that do not receive Federal financial assistance.

HUD is the designated agency for all programs, services and regulatory activities relating to State and local public housing, and housing assistance and referrals. In addition, HUD has jurisdiction over a State or local government activity when HUD has jurisdiction under Section 504 of the Rehabilitation Act of 1973.

D.5 The Architectural Barrier Act of 1968

The Architectural Barriers Act (ABA) requires buildings and facilities that are constructed by or on behalf of, or leased by the United States, or buildings financed, in whole or in part, by a grant or loan made by the United States to be accessible to persons with mobility impairments. The Architectural and Transportation Barriers Board (ATBCB) has coordination authority for the ABA.

D.6 Section 504 of the Rehabilitation Act of 1973, as amended

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination against persons with disabilities in any program or activity receiving Federal financial assistance.

D.7 Executive order 12898, Environmental Justice

Executive Order 12898 provides that each Federal agency shall conduct its programs, policies, and activities that substantially affect human health or the environment, in a manner that ensures that such programs, policies, and activities do not have the effect of excluding persons (including populations) from participation in, denying persons (including populations) the benefits of, or subjecting persons (including populations) to discrimination under, such programs, policies, and activities, because of their race, color, or national origin.

D.8 Non-discrimination

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. Complaints may be filed with the City of Detroit, Civil Rights, Inclusion, & Opportunity Department (formerly Human Rights Department), 12TH Floor, Coleman A. Young Municipal Center, Detroit, Michigan 48226.

Executive Order 11063 (Non-Discrimination and Equal Opportunity in Housing) directs HUD and all other executive departments and agencies to take appropriate action to promote the abandonment of discriminatory practices with respect to property or facilities owned or operated by the Federal Government or provided with Federal financial assistance in the sale, leasing, rental, or other disposition of such property or facilities.

D.9 Age Discrimination

The Age of Discrimination Act of 1975, prohibits discrimination on the basis of age in programs or activities receiving Federal financial assistance, directly or through contractual, licensing, or other arrangements use age distinctions or take any other actions which have the effect, on the basis of age of:

Excluding individuals from denying them the benefits subjecting them to discrimination under, a program or activity receiving Federal financial assistance; or

Denying or limiting individuals their opportunity to participate in any program or activity receiving Federal financial assistance.

D.10 Environmental Review

An environmental review is the process of reviewing a project and its potential environmental impacts to determine whether it meets federal, state, and local environmental standards. The environmental review process is required for most federally funded projects to ensure that the proposed project does not negatively impact the surrounding environment and that the property site itself will not have an adverse environmental or health effect on end users. Not every project is subject to a full environmental review (i.e., every project's environmental impact must be examined, but the extent of this examination varies), but every project must be in compliance with the [National Environmental Policy Act \(NEPA\)](#), and other related Federal and state environmental laws. Each project application for Section 108 Loan Guarantee Funds will be required to undergo an environmental review.

Title I of the National Environmental Policy Act (NEPA) contains a Declaration of National Environmental Policy. This policy requires the federal government to use all practicable means to create and maintain conditions under which man and nature can exist in productive harmony. Section 102 in Title I of the Act requires federal agencies to incorporate environmental considerations in their planning and decision-making through a systematic interdisciplinary approach. Specifically, all federal agencies are to prepare detailed statements assessing the environmental impact of and alternatives to major federal actions significantly affecting the environment. These statements are commonly referred to as Environmental Impact Statements (EIS) and Environmental Assessments (EA).

D.11 National Environmental Policy Act (NEPA) Contract/Award “Rewind Language”

Notwithstanding any provision of this Agreement, the parties hereto agree and acknowledge that this Agreement does not constitute a commitment of funds or site approval, and that such commitment of funds or approval may occur only upon satisfactory completion of environmental review and receipt by the City

of Detroit of a release of funds from the U.S. Department of Housing and Urban Development under 24 CFR Part §58. The parties further agree that the provision of any funds to the project is conditioned on the City of Detroit's determination to proceed with, modify or cancel the project based on the results of a subsequent environmental review.

D.12 Copeland "Anti-Kickback" Act

The "Anti-Kickback" section of the Act precludes a contractor or subcontractor from inducing an employee, in any way, to give up any part of the compensation to which he or she is entitled under his or her contract of employment. The Act and implementing regulations require a contractor and subcontractor to submit a weekly statement of the wages paid to each employee performing on covered work during the preceding payroll period. The regulations also list payroll deductions that are permissible without the approval of the Secretary of Labor and those deductions that require consent of the Secretary of Labor.

D.13 Uniform Relocation Act

The [Uniform Act](#), passed by Congress in 1970, is a federal law that establishes minimum standards for federally funded programs and projects that require the acquisition of real property (real estate) or displace persons from their homes, businesses, or farms. The Uniform Act's protections and assistance apply to the acquisition, rehabilitation, or demolition of real property for federal or federally funded projects. Government wide regulations that implement URA can be found at 49 CFR Part 24.

D.14 Occupational Safety and Health Act of 1970 (OSHA)

Congress passed the Occupational Safety and Health Act to ensure worker and workplace safety. Their goal was to make sure employers provide their workers a place of employment free from recognized hazards to safety and health, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions.

D.15 National Historic Preservation Act

The National Historic Preservation Act ([NHPA](#)), 54 U.S.C. 306108, directs each Federal agency, and those Tribal, State, and Local governments that assume Federal agency responsibilities, to protect historic properties and to avoid, minimize, or mitigate possible harm that may result from agency actions. The review process, known as Section 106 review, is detailed in 36 CFR Part 800. Early identification and consideration of historic properties in project planning along with full consultation with interested parties are key to effective compliance with Section 106. The State Historic Preservation Officer (SHPO) and/or Tribal Historic Preservation Officer (THPO) are primary consulting parties in the process. A qualified historic preservation consultant may assist with the technical components of the Section 106 review process.

For Detroit's HUD-funded activities or projects, the authority to conduct a Section 106 review is held by the Michigan SHPO. However, the Michigan SHPO has delegated certain aspects of its authority to the City of Detroit through the use of a Programmatic Agreement (PA). The PA is a legal document that allows the City of Detroit to conduct the review of its HUD-funded activities or projects. The PA also includes a description of the review process. This review is facilitated and managed by the Preservation Specialist who is housed within the City of Detroit Housing & Revitalization Department.

D.16 Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion

1. By signing this Contract, the Contractor, also referred to herein as a “prospective lower tier participant”, is providing the certification set out below.
2. The certification in this clause is a material representation of fact upon which reliance was placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.
3. The prospective lower tier participant shall provide immediate written notice to the person to which this proposal is submitted if at any time the prospective lower tier participant learns that this certification was erroneous when submitted or has been erroneous by reason of changed circumstances.
4. The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meanings set out in the Definitions and Coverage sections of rules implementing Executive Order 12549. You may contact the person to which this proposal is submitted for assistance in obtaining a copy of those regulations.
5. The prospective lower tier participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency with which this transaction originated.
6. The prospective lower tier participant further agrees by submitting this proposal that it will include this clause titled "Certification Regarding Debarment, Suspensions Ineligibility and Voluntary Exclusion - Lower Tier Covered Transactions," without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
7. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from covered transactions, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Non-procurement Programs.
8. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
9. Except for transactions authorized under paragraph 5 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.

CERTIFICATION REGARDING DEBARMENT, SUSPENSION, INELIGIBILITY AND VOLUNTARY EXCLUSION - LOWER TIER COVERED TRANSACTIONS.

(1) The prospective lower tier participant certifies, by submission of this proposal, that neither it nor its principals is presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency

(2) Where the prospective lower tier participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation of this proposal.

CONTRACTOR:

BY:

Print:

ITS:

Date:

D.17 Certification for Contracts, Grants, Loans, and Cooperative Agreements

The Contractor hereby certifies, to the best of his or her knowledge and belief that:

- (1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment or modification of any Federal contract, grant, loan, or cooperative agreement.
- (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.
- (3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

CONTRACTOR:

BY:

Print:

ITS:

Date:

D.18 Conflict of Interest Clause

The Contractor warrants that its participation in this contract will conform to the requirements of all applicable federal regulations including Sections 2 CFR 200.318 and 2 CFR 200.315 and 24 CFR 570.611 of the Code of Federal Regulations, and further warrants that such participation will not result in any Organizational Conflict of Interest (as defined herein).

11. In the event the Contractor has any conflict of interest as defined herein, the Contractor shall disclose such conflict of interest fully in the submission of the proposal and/or during the life of the contract.
12. The Contractor agrees that if after award he or she discovers any conflict of interest with respect to this contract, he or she shall make an immediate and full disclosure in writing to the Director and Executive Manager, which shall include a description of the action which the Contractor has taken or intends to take to eliminate or neutralize the conflict. The Housing and Revitalization Department may, however, terminate the contract if it is in best interest of the City.
13. In the event the Contractor was aware of any conflict of interest before the award of this contract and intentionally did not disclose the conflict, the Housing and Revitalization Department may terminate the contract for default.
14. The provisions of this clause shall be included in all subcontracts and consulting agreements.
15. No federal, state or local elected official nor any member of the City of Detroit Planning Commission or employee of the Housing and Revitalization Department nor any corporation owned or controlled by such person, shall be allowed to participate in any share or part of this contract or to realize any benefit from it.
16. No member, officer, or employee of the City of Detroit Housing and Revitalization Department, no member of the governing body of the City of Detroit or any other local government and no other public official of such locality or localities who exercises any functions or responsibilities with respect to the project, shall, during his or her tenure, or for one year thereafter, have any interest, direct or indirect, in this contract or the proceeds thereof.
17. The Housing and Revitalization Department reserves discretion to determine the proper treatment of any conflict of interest disclosed under this provision.
18. The Contractor covenants that it presently has no interest and shall not acquire any interest, direct or indirect, which would conflict in any manner or degree with the performance of the Services under

this Agreement. The Contractor further covenants that in the performance of this Agreement, no person having any such interest shall be employed.

19. The Contractor further covenants that no elected or appointed official, or employee of the City and no other public official who exercises any function or responsibilities in the review or approval of the undertaking or performance of this Agreement has any personal or financial interest, direct or indirect in this Agreement or the proceeds thereof.
20. The Contractor also hereby warrants that it shall not and has not employed any person to solicit or secure this Agreement upon any agreement or arrangement for payment of a commission, percentage, brokerage or contingent fee, either directly or indirectly, and that if this warranty is breached, the City may, at its option, terminate this Agreement without penalty, liability or obligation and, in addition, may, at its election, deduct from any amounts owed to the Contractor hereunder, the amounts of any such commission, percentage, brokerage or contingent fee.

EXHIBIT E: ADDITIONAL OBLIGATIONS & REQUIREMENTS FOR CONSTRUCTION, MAINTENANCE OR REPAIR CONTRACTS AND SUBCONTRACTS.

E.1 Section 3 General Information

If the Services required hereunder include construction work, then it will trigger Section 3. The Contractor shall require all such construction work to be performed in compliance with and shall monitor all such construction work for compliance with, all applicable Section 3 regulations, as described in the language found in the regulations at 24 CFR Part 75 and shall report any noncompliance to the HRD, as required by Federal regulations.

Section 3 is a provision of the Housing and Urban Development (HUD) Act of 1968, federal regulation formerly 24 CFR Part 135. HUD released a final rule in the fall of 2020 changing the regulation to 24 CFR Part 75. The final rule moved from tracking the number of qualified new hires (Section 3 residents) in Section 3 projects to tracking the total labor hours worked (by Section 3 workers and Targeted Section 3 workers).

The new Section 3 regulation, 24 CFR Part 75 continues to ensure that economic opportunities, most importantly employment, generated by certain HUD financial assistance shall be directed to low- and very low-income persons, particularly those who are residents of the community in which the federal assistance is spent.

Section 3 applies to projects that are fully or partially funded with HUD financial assistance. Section 3 projects are housing rehabilitation, housing construction, and other public construction projects and activities assisted under HUD programs when the total amount of assistance to the project exceeds a threshold of \$200,000. The threshold is \$100,000 where the assistance is from the Lead Hazard Control and Healthy Homes programs (§75.3 (2) (i)). However, Section 3 regulation does not apply to material only contracts. All parties associated with each project must maintain documentation for a period of time required for record retention or in the absence of applicable program regulation in accordance with 2 CFR Part 200.

City of Detroit Section 3 Program Information

<https://detroitmi.gov/departments/housing-and-revitalization-department/hud-programs-and-information/section-3-program>

Section 3 Frequently Asked Questions (FAQs)

<https://www.hud.gov/sites/documents/11SECFAQS.PDF>

Code of Federal Regulations for Section 3

<https://www.ecfr.gov/current/title-24/subtitle-A/part-75?toc=1>

E.2 Section 3 Language

All HUD Section 3 covered contracts shall include the following language:

A. The work to be performed under this contract is subject to the requirements of Section 3 of the Housing and Urban Development Act of 1968, as amended, 12 U.S.C. 1701u (Section 3). The purpose of Section 3 is to ensure that employment and other economic opportunities generated by Housing and Urban Development (HUD) assistance or HUD-assisted projects covered by Section 3, shall, to the greatest extent feasible, be directed to low- and very-low income persons.

B. The Parties to this contract agree to comply with HUD 24 CFR Part 75 regulation and City of Detroit Housing and Revitalization Department (HRD) policy and guidelines related to the implement Section 3. As evidenced by their execution of this contract, the parties to this contract certify that they are under no contractual or other impediments that would prevent them from complying with HUD 24 CFR Part 75 regulation or HRD requirements.

C. The contractor agrees to include this Section 3 language in every subcontract subject to compliance with HUD 24 CFR Part 75 regulation, and agrees to take appropriate action, as provided in an applicable provision of the subcontract or in this Section 3 language, upon a finding that the subcontractor is in violation of HUD 24 CFR Part 75 regulation or HRD policy and guidelines. The contractor will not subcontract with any subcontractor where the contractor has, or could be reasonably expected to have had, notice or knowledge that the subcontractor has been found in violation of HUD 24 CFR Part 75 regulation.

D. Noncompliance with HUD 24 CFR Part 75 regulation or HRD policy and guidelines may result in sanctions, termination of this contract for default, and debarment or suspension from future HUD assisted contracts at the sole discretion of the City of Detroit Housing and Revitalization Department.

E.3 Labor Standards General Information

If the Services required hereunder include construction work, the Contractor shall require all such construction work to be performed in compliance with, and shall monitor all such construction work for compliance with, all applicable Federal Labor Standards, as described in the clauses found in the regulations at 29 CFR Part 5 ~~2-CFR-200~~ and shall report any noncompliance to the HRD, as required by Federal regulations.

The Contractor shall require that all necessary contract language required by the regulations at ~~2-CFR-200~~ and (2) by City of Detroit Executive Order 2016-1 be included in all construction contracts and subcontracts for construction performed under this Agreement. In the event that the Contractor should directly employ workers on actual construction, the Contractor shall comply with (1) all Federal labor standards applicable to the employment of such workers; and (2) City of Detroit Executive Order 2016-1.

The Contractor shall monitor all construction work performed under this Agreement or performed under the supervision and/or control of the Contractor for compliance with all applicable Federal Labor Standards,

including those described at [2-CFR-200](#) and shall comply and/or require compliance with City of Detroit Executive Order 2016-1, and shall report any noncompliance with said Federal requirements and with said Executive Order 2016-1 to the HRD.

E.4 Federal Labor Standards Provisions

<https://www.hud.gov/sites/dfiles/OCHCO/documents/4010.pdf>

E.5 Build America, Buy America Act (BABA)

The [Build America Buy America Act](#), enacted as part of the Infrastructure Investment and Jobs Act on November 15, 2021, established a domestic content procurement preference for all Federal financial assistance obligated for infrastructure projects after May 14, 2022. The domestic content procurement preference requires that all iron, steel, manufactured products, and construction materials used in covered infrastructure projects are produced in the United States.

Davis Bacon Wage Determination

The Davis-Bacon Act (DBA or Act), enacted in 1931, requires the payment of locally prevailing wages and fringe benefits on Federal contracts for construction. *See* [40 U.S.C. 3142](#). The DBA applies to workers on contracts entered into by Federal agencies and the District of Columbia that are in excess of \$2,000 and for the construction, alteration, or repair of public buildings or public works. Congress subsequently incorporated DBA prevailing wage requirements into numerous statutes (referred to as “Related Acts”) under which Federal agencies assist construction projects through grants, loans, loan guarantees, insurance, and other methods.

E.9 Executive Order 11246/ Equal Opportunity Clause

During the performance of this Contract, the Contractor agrees as follows:

The Contractor will not discriminate against any employee or applicant for employment because of race, color, religion, sex, or national origin. The Contractor will take affirmative action to ensure that applicants are employed, and that employees are treated during employment, without regard to their race, color, religion, sex nor national origin. Such action shall include, but not be limited to the following: employment, upgrading, demotion, or transfer; recruitment or recruitment advertising; layoff or termination; rates of payoff or other forms of compensation and selection for training including apprenticeship. The Contractor agrees to post in conspicuous places, available to employee and applicants for employment, notices to be provided by the contracting officer setting forth the provisions of this nondiscrimination clause.

The Contractor will, in all solicitations or advertisements for employees placed or on behalf of the Contractor, state that all qualified applicants will received consideration for employment without regards to race, color, religion, sex or national origin.

The Contractor will send to each labor union or representative of workers with which he has a collective bargaining agreement or other contract or understanding, a notice, to be provided by the agency contracting officer, advising the labor union or workers representative of the Contractor's commitments under Section 202 of Executive Order No. 11246 of September 24, 1965, and shall post copies of the notice in conspicuous places available to employees and applicants for employment.

The Contractor will comply with all provisions of Executive Order No. 11246 of September 24, 1965, and by the rules, regulations, and relevant orders of the Secretary of Labor.

The Contractor will furnish all information and reports required by Executive Order No.11246 of September 24, 1965, and by the rules, regulations, and orders of the Secretary of Labor, or pursuant thereto, and will permit access to his books, records, and accounts by the contracting agency and the Secretary of Labor for purpose of investigation to ascertain compliance with such rules, regulations, and orders.

In the event of the Contractor's noncompliance with the nondiscrimination clauses of this contract or with any of such rules, regulations, or orders, this contract may be canceled, terminated, or suspended in whole or in part and the Contractor may be declared ineligible for further Government contracts in accordance with procedures authorized in Executive Order No. 11246 of September 24, 1965 and such other sanctions may be imposed and remedies invoked as provided in Executive Order No. 11246 of September 24, 1965, or by rule, regulation, or order of the Secretary of Labor, or as otherwise provided by law.

The Contractor will include the provisions of Paragraphs (1) through (7) in every subcontract or purchase order unless exempted by rules, regulations, or order of the Secretary of Labor issued pursuant to Section 204 of Executive Order No. 11246 of September 24, 1965, so that such provisions will be binding upon each subcontractor or vendor. The Contractor will take such action with respect to any subcontract or purchase order as the contracting agency or the Secretary of Labor maybe directed as a means of enforcing such provisions including sanction for noncompliance: Provided, however, that in the event the Contractor become involved in, or is threatened with litigation with a subcontractor or vendor as a result of such direction by the contracting agency or the Secretary of Labor, the Contractor may request the United States to enter into such litigation to protect the interests of the United States.

DRAFT

7.4 Project File Checklist

Completed PFR Project Checklist

Organization Name: _____

DRGR Number: _____

Contract Number: _____

CDBG Eligibility: _____

Purchase Order Number: _____

Checklist Completion Date: _____

Checklist ItemsComments

1. NOFA	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	_____
2. City Council Resolution	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	_____
3. Award Letter	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	_____
4. Approved Award Memo	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	_____
5. LMA/LMC Determination	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	_____
6. Environmental Clearance	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	_____
7. Sam.gov (4)	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	_____
8. Subrecipient Determination Memo	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	_____
9. Before Photos	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	_____
10. Signed Subrecipient Agreement	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	_____
11. NTP Phase 1	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	_____
12. Project Architectural Designs	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	_____
13. GC Advertisement	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	_____
14. Procurement Bid Register	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	_____
15. GC Bonds	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	_____
16. GC Contract/AIA 305	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	_____
17. Signed Exhibit D	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	_____
18. Wage Decision	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	_____
19. Filed Lien	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	_____
20. NTP Phase 2	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	_____
21. All Completed Draw Packets	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	_____
22. Any Contract Amendments	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	_____
23. HUD 2516 (Section 3)	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	_____
24. GC/Sub lien waivers	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	_____
25. Beneficiary Data Form	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	_____



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- | | | | | |
|----------------------------------|------------------------------|-----------------------------|------------------------------|-------|
| 26. After Photos | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> | _____ |
| 27. IDIS Project Narrative | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> | _____ |
| 28. Recapture of Funding Notice | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> | _____ |
| 29. Other Documents | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> | _____ |
| 30. Disaster Tieback | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> | _____ |
| 31. Duplication of Benefits Form | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> | _____ |
| 32. CDBG-DR Reporting | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> | _____ |

DRAFT

7.5 Monitoring Checklist



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Public Facility Rehabilitation

Subrecipient Monitoring Worksheet

Subrecipient: _____	Project Address: _____
CPA and IDIS: _____	National Objective: _____
Eligible Activity: _____	Project End Date: _____
Date of Monitoring: _____	Lien Release Date: _____

1. Program and Project Summary:

2. Does the subrecipient continue to operate in such a manner that is consistent with maintaining the eligible criteria that allowed for submission to the PFR NOFA and CDBG Award?

3. If LMC, do the subrecipient's files have documentation showing the activity is limited to one or a combination of the presumed low/mod income beneficiaries? If so, which presumed low/mod categories are served? Does the subrecipient continue to serve this population?

4. If LMC, if the activity is classified under family size and income, describe the subrecipient documentation on program beneficiaries. Confirm at least 51% of beneficiaries are members of a low/mod income family or that documentation exists that the program is restricted to only serving low/mod income persons. Verify correct income limits were used.

5. If LMC, verify that supporting documentation for reported beneficiaries supports what is entered in IDIS.



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6. If LMA, how was the service area defined and does this seem reasonable? Was this service area at the time of the award primarily residential and did it contain at least 51% low/mod income persons? What data and documentation was used to make this determination?
7. If LMA, are there any fees charged to use the facility or service? If so, how much is charged? Would this amount preclude a low/mod income person from using the facility or service? Is there evidence that low/mod income individuals are using the facility or service?
8. Were Davis-Bacon and Section 3 requirements met?
9. Are there any continuing obligations as defined in the environmental assessment? If so, describe documentation and compliance.
10. Faith-based subrecipients, is the portion of the facility rehabilitated using CDBG funds being used for overtly religious activities? Compare the cost allocation for eligible/ineligible space. Does this align with the original application and project scope?
11. Check for compliance with the following cross-cutting federal regulations (where applicable).
 - a. Build America, Buy America
 - b. ADA/Reasonable accommodation
 - c. Drug free Workplace
 - d. Audit Requirement (if over \$750,000 in federal expenses)

Notes:



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6. If LMA, how was the service area defined and does this seem reasonable? Was this service area at the time of the award primarily residential and did it contain at least 51% low/mod income persons? What data and documentation was used to make this determination?
7. If LMA, are there any fees charged to use the facility or service? If so, how much is charged? Would this amount preclude a low/mod income person from using the facility or service? Is there evidence that low/mod income individuals are using the facility or service?
8. Were Davis-Bacon and Section 3 requirements met?
9. Are there any continuing obligations as defined in the environmental assessment? If so, describe documentation and compliance.
10. Faith-based subrecipients, is the portion of the facility rehabilitated using CDBG funds being used for overtly religious activities? Compare the cost allocation for eligible/ineligible space. Does this align with the original application and project scope?
11. Check for compliance with the following cross-cutting federal regulations (where applicable).
 - a. Build America, Buy America
 - b. ADA/Reasonable accommodation
 - c. Drug free Workplace
 - d. Audit Requirement (if over \$750,000 in federal expenses)

Notes:

7.6 Sample Reporting Requirements
PUBLIC FACILITY REHABILITATION IDIS ACCOMPLISHMENT FORM

PROJECT NAME: _____

PROGRAM MANAGER: _____

IDIS# _____ REPORTING PERIOD _____

NATIONAL OBJECTIVE: _____

LMC ____ LMA ____ (If LMA need CENSUS TRACTS) _____

% OF LOW/MOD IN SERVICE AREA: _____

ACCOMPLISHMENTS NARRATIVE:

For LMC only:

Direct Benefit Data by Persons Race/Ethnicity

	<u>Total</u>	<u>#Hispanic</u>
White:	_____	_____
Black/African American:	_____	_____
Asian:	_____	_____
American Indian/Alaskan Native:	_____	_____
Native Hawaiian/Other Pacific Islander:	_____	_____
American Indian/Alaskan Native & White:	_____	_____
Asian & White:	_____	_____
Black/African American & White:	_____	_____
Am.Indian/Alaskan Native/Black Af. Am.:	_____	_____
Other Multi-Racial:	_____	_____

***Total:**

Beneficiary Income	Total Number
Extremely Low	
Low	
Low/Moderate	
*Total	

7.8 CDBG-DR Duplication of Benefit Certification Form



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City of Detroit

Housing and Revitalization Department

CDBG-DR (Disaster Recovery) Duplication of Benefits Certification Form

The City of Detroit shall ensure there are adequate procedures in place to prevent any duplication of benefits as required by section 312 of the Robert T. Stafford Disaster Relief and Emergency Assistance 1 Act (42 U.S.C. 5155) and in accordance with section 1210 of the Disaster Recovery Reform Act of 2018 (division D of Public Law 115-254; 132 Stat. 3442), which amended section 312 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5155).

Duplication of Benefits occurs when a beneficiary receives assistance from multiple sources for a cumulative amount that exceeds the total need for a particular recovery purpose. The amount of the duplication is the amount of assistance provided in excess of need. The Stafford Act requires a fact-specific inquiry into assistance received by each person, household, or entity.

☐ I/We, _____, affirm _____ DID NOT receive benefit from any other federal disaster relief/recovery programs (i.e., FEMA, SBA, Insurance). (NO FURTHER ACTION)

☐ I/We, _____, affirm _____ DID receive benefits from other federal disaster relief/recovery programs (i.e. FEMA, SBA, Insurance) but not for the exact SAME expenses being requested from the City of Detroit or its Subrecipients.

By executing this Certification, Applicant(s) acknowledge and understand that Title 18 United States Code Section 1001: (1) makes it a violation of federal law for a person to knowingly and willfully (a) falsify, conceal, or cover up a material fact; (b) make any materially false, fictitious, or fraudulent statement or representation; OR (c) make or use any false writing or document knowing it contains a materially false, fictitious, or fraudulent statement or representation, to any branch of the United States Government; and (2) requires a fine, imprisonment for not more than five (5) years, or both, which may be ruled a felony, for any violation of such Section.

Applicant Signature

Date

Co-Applicant Signature

Date

I/We, _____, affirm the following dated this the _____ day of _____, 20____:

List amount and source for ALL Federal and/or State financial assistance received for disaster recovery or resiliency planning projects

I/We have received the following disaster recovery assistance funds from (List program(s):

1 Source of Funding	2 Amount Awarded (\$)	3 Use of Funds	4 Verification of Award (✓) or (X)	5 Documentation of Expenditure (✓) or (X)	6 Amount Expended
a. FEMA					
b. Small Business Administration (SBA) Loan					
b. Insurance					
c. Private Funds					
d. _____					
Total					
Duplication of Benefits Total From Column 2 \$ _____ : NOTES: _____					

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