



PY 2010/2011 Annual Plan - DRAFT

The CPMP Annual Action Plan includes the [SF 424](#) and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

Narrative Responses

GENERAL

Executive Summary

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

Program Year 2 Action Plan Executive Summary:

Macomb County is an Urban County serving 21 municipalities. Inaugurated in 1982 (CDBG), the County became a HOME PJ in 1992, and formed the Macomb HOME Consortium (MHC) in 2006, together with Roseville, Sterling Heights, and Clinton Township. **Attachments 1 and 2** show the MHC and Urban County jurisdictions. The Urban County will receive \$1,590,000 in CDBG funds, and the MHC will receive \$1,305,353 in HOME funding. We expect to earn \$69,000 in CDBG and \$20,000 in HOME program income. Detail is found on the Projects spreadsheet.

This Annual Plan implements the MHC Consolidated Plan, effective from July 1, 2009 through June 30, 2013, and details the CDBG program for the Urban County, and the HOME program for the Consortium. The CDBG Annual Plans prepared by the other Consortium members will be submitted separately. The following narrative details how the County and the MHC will implement the priorities, objectives and activities of the Consolidated Plan. The CDBG, and HOME Programs have clearly defined objectives developed through the consolidated planning process, as follows. Detail on them can be found in the Consolidated Plan.

Priority Objective #1 – Address the Foreclosure Crisis

Priority Objective #2 – Housing

Priority Objective #3 – Public Facilities and Infrastructure

Priority Objective #4 – Address the Needs of the Homeless and At-Risk Families

Priority Objective #5 – Provide and Expand Human Services

Priority Objective #6 – Expand Comprehensive Planning & Management & Capacity Development

Priority Objective #7 – Encourage Business Retention & Attraction

General Questions

1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.

Macomb County is diverse, with older development and population centers generally, but not always, found in the south. The frequency and intensity of development generally diminishes to the north, particularly in the northeast and north central areas where, except for several smaller communities, rural conditions predominate.

Income levels also vary by area. Incomes tend to be lower in the older suburbs and in the older cities and villages, and higher in more recently developed areas. Even there, however, one finds small concentrations of lower income (LI) people. We believe that the recent economic downturn has altered this pattern, but cannot confirm it. **Attachment 3** identifies LI areas in 2006. We will direct assistance to these areas to the extent possible. Other activities that target specific LI populations, or directly assist LI people may be undertaken throughout the Urban County.

The number and proportion of Macomb County minority residents is growing as shown in the following table, with 1990 data as a baseline.

Year	White	African-American	Asian	Hispanic (any Race)
1990 ¹	95.8%	1.4%	1.2%	1.1%
2000	93%	<3%	2.5%	1.5%
2006 ² (est.)	88.3%	6%	3.3%	2.0%

The table shows a steady increase of African-American and Hispanics from 1990 to 2006, and smaller, but identifiable Asian or Middle Eastern populations. In 2006 two communities, New Haven and Mt. Clemens, had sizeable minority populations, 25% of the total, with African-Americans or Hispanics comprising 19%. No other community had a combined minority population exceeding 10% in 2006. In 2007 ACS recorded dramatic increases among minorities, particularly African-Americans (20%), in Eastpointe, and lesser increases throughout the County. Finally, the number of foreign-born residents, at 9.6%, is substantial. Clearly, the trends indicate increasing racial and ethnic diversity. We expect further changes when 2010 census data are revealed.

Race and income sometimes correlate, as racial minorities can have lower incomes, a phenomenon reflected in Mt. Clemens, New Haven, and Eastpointe. Activities will be located in LI census tracts and block groups, or serve such populations. Communities with minority concentrations will direct funding into their LI (and minority) areas. The sheer number of activities prohibits identification on a map, and the reader is referred to the Projects file for a description and location (by census tract and block group).

Macomb County practices home rule, and therefore allocates as much CDBG funding as possible to member communities. They, in turn, have identified activities and assistance areas, based on citizen input informed by statute and regulation, to address local needs and priorities

2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.

¹ Source: 1990 and 2000 U.S. Census

² Source: 2006 American Community Survey, U.S. Census

Macomb County is not an EMSA and does not receive HOPWA funding.

3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs. The following actions will be undertaken to address underserved needs
 - a) Chore Services, and Weatherization, through MCCSA and Romeo Parks, to provide home maintenance and minor home repairs to LI people who couldn't otherwise afford them.
 - b) Providing senior services and programs for elderly and disabled people who could not otherwise pay for them, through various communities and private organizations
 - c) CoC planning to end homelessness and obtain funding for critical homeless needs.
 - d) Working with housing providers and others to provide shelter and permanent housing for the homeless, and provide related services to address root cause of their problems.
 - e) Working with United Way and other agencies to identify critical gaps in service delivery and, if feasible, expand service offerings through effective enhanced coordination.
 - f) Working with other Macomb Entitlement Cities and other peer communities to explore mutual housing concerns and opportunities.
 - g) Continued implementation of the NSP1, implementation of NSP3, amendment of CDBG-R, and completion of the HPRP.
4. Identify the federal, state, and local resources expected-to-be-made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.

Please see the Projects spreadsheet for a detailed project description. There is no there, however, pertaining to certain homeless and rental programs. These are detailed below. We are not aware of any LIHTC projects in Macomb County at this time.

Rental Assistance	Budget	# Units
LRPH/Section 8	\$6,714,012	4,794
HARP Vouchers (CoC)	\$2,102,400	351
MSHDA Vouchers	\$1,400,000	900
Available Resources	\$10,216,412	5,945 ³
Homeless Assistance	\$800,884	
MSHDA Homeless Grant	\$203,301	
Available Resources	\$ 1,004,185	
Available Resources:	\$11,220,597	

Managing the Process

1. Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.

MCPED was the lead agency in developing this Plan.

2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.

³ Includes assistance from MSHDA, Clinton Twp., Eastpointe, Mt. Clemens, New Haven, Roseville, and Sterling Heights Housing Commissions, and an increasing allocation of HARP Vouchers made available through the County's CoC. Other affordable privately rental housing and public housing not located in urban county jurisdiction not included.

Significant aspects of the Plan's development included the following:

- The County requested proposals from non-profit providers on October 15, 2010 to start the planning cycle for the 2011 CDBG program.
 - The County held a workshop on October 29, 2011 for service agencies, to explain requirements. Agencies received paper and e-versions of all documents and support material required for completing applications.
 - The County held a workshop on December 3, 2011 for communities to explain requirements. Communities received paper and e-versions of all documents and support material required to complete applications.
 - Staff reviewed and qualified non-profit applications, and provided a summary of qualified non-profit activities to the 21 local communities in January 2011. Communities used the summaries to select non-profit projects.
 - Each community held a public hearing by February 28, 2011 to encourage citizen and stakeholder comments on community needs and activities.
 - Community applications were developed and submitted to the County by March 1, 2011.
 - Staff reviewed community applications, and developed narrative and support data for the Plan between February and May.
 - The County's Proposed Annual Plan was published in the Macomb Daily on April 14, 2011 posted online, and made available at the MCPED office.
 - The County's public hearing occurred on **May 16, 2011** to solicit citizen comment.
 - The Board's Economic Development Committee considered, and forwarded the Plan for full Board consideration on **May 19, 2011**.
 - **The Plan was electronically forwarded to HUD on May 17, 2010, contingent on Board of Commissioners approval. The Board of Commissioners will meet on May 26, 2011.**
 - Formal submission to HUD occurred on **May 27, 2011**.
3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.

The County will, in partnership, evaluate, develop, and implement:

- a) the housing and service needs within its jurisdiction,
- b) the capability of housing and service delivery systems to develop and fund new programs,
- c) partnerships with public and private health and social service agencies to identify service delivery gaps and more effectively funding across agencies,
- d) partnerships with other partners to address the County's foreclosure crisis.

Citizen Participation

1. Provide a summary of the citizen participation process.

Please refer to the immediately preceding Question #2.

2. Provide a summary of citizen comments or views on the plan.

TBD

3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.

Please refer to the Consolidated Plan narrative, pp. 5-6.

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4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

No comments were received.

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

Institutional Structure

Describe actions that will take place during the next year to develop institutional structure.

Macomb County has excellent administrative capacity, with capable staff, excellent relationships with communities and non-governmental entities, and innovative programs. Capacity has, however, deteriorated in a harsh economy. With diminished revenues, we must offset lost resources to maintain our edge. The following are therefore considered for the coming year:

Management Capacity

- develop cost-effective ways to address affordable housing needs. We will share resources and costs to maintain an acceptable level of program and management capacity.
- identify service gaps and improve efficiency and effectiveness in their delivery.
- develop and implement new programs and initiatives, if necessary and in keeping with the priority objectives of this Plan.

Program Administration

HERA, ARRA, and now NSP3 have added to the County's administrative burden. This has been offset through palliative measures, including inactivating the housing rehabilitation program, and outsourcing administrative functions to other staff, which have proven effective.

CHDO Capacity Development – Staff will continue efforts to strengthen CHDO capacity, when applicable, and develop new, effective housing programs.

Expanding the Network of Partners – Continue efforts to strengthen existing, and establish new, relationships with service providers to expand and strengthen services in the community.

Sub-recipient Monitoring – The County and the MHC will monitor and assist sub-recipients and CHDO's in 2011.

Monitoring

Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

MCPED will monitor CDBG, HOME, NSP, CDBG-R, and HPR by:

- a) tracking project implementation, quality, and accomplishments, reporting to citizens and other stakeholders.
- b) using draw-down and related documentation for internal monitoring purposes.
- c) assisting, and monitoring, communities and contractors to ensure procurement and labor compliance, primarily at the time of procurement and contract award, but also to ensure compliance should problems arise.
- d) monitoring and assisting communities on a selective basis to help improve performance.
- e) monitoring projects older than 2 years and obtaining corrective measures (either firm schedules for implementation or reprogramming to other, higher-priority items), ensuring that no community has excess funds (based on HUD's regulatory standard of 1.5 x most recent allocation), and otherwise acting to ensure timely program implementation.

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- f) monitoring accomplishments to determine the degree of success in implementing Consolidated Plan objectives.

The County is responsible for HOME compliance and will therefore undertake the following:

- a) meeting with Consortium members to focus on program coordination and effectiveness.
- b) monitoring overall grant progress from approval to closeout,
- c) monitoring projects and sub-recipients, especially high-risk projects and activities, focusing on tenant eligibility and unit habitability (the County's objective is to monitor 25% of sub-recipients and developers annually based on perceived risk), and
- d) although rehabilitation compliance is ensured through rigorous construction management, it is possible that issues could arise. If so, monitoring will occur to address any housing rehabilitation performance or related issues as they arise.

Lead-based Paint

Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

The County complies with the Lead Safe Housing Rule (LSHR) and no actions are required to expand capacity. The County directs housing assistance exclusively to ELI, LI and MI households. All units comply with the LSHR, therefore the targeted population benefits.

HOUSING

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

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.

Housing priorities, identified in the Consolidated Plan, are based on the following:

- a) The high number of home foreclosures has strained family and institutional systems. We must use vacant homes to provide homeownership and rental opportunities for at-risk families. An abundance of foreclosed homes and probable additional foreclosures mean that there is little, if any, need for new single-family home construction at this time.
- b) Homeowners have historically outnumbered renters. There are few deep subsidy programs for LI homeowners. The level of assistance possible through NSP, HOME and CDBG indicates continuation of homeowner assistance for housing repair and maintenance, and for providing homebuyer assistance. Should that be infeasible, the focus could shift to renters.
- c) Renter assistance is available through Federal and State subsidy programs, including LRPH, Housing Choice Voucher, homeless, and the HPRP which, unfortunately, will end this year. These target households with incomes $\leq 50\%$ of AMI, with a substantial set-aside for households $\leq 30\%$ AMI. The County will continue to support those programs to the extent they are available.
- d) Investors may be purchasing foreclosed homes, intending to sell or rent them, depending on market conditions. We expect that many will be rented, for the time being, and there is little, if any, need for new rental construction.

The County's housing priorities follow:

- a. Homebuyer assistance (primarily through homebuyer assistance and NSP).

- b. Housing rehabilitation through the HOME program, with single-purpose emergency repairs offered through CDBG.
 - c. Home maintenance and chore services (primarily through CDBG).
 - d. Rental assistance, particularly for those recently made homeless and those with special needs, through housing acquisition with some repair, and rental assistance as needed (primarily through HOME and HPRP).
 - e. Rental rehabilitation, if appropriate and feasible (primarily through HOME).
- e) Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

The Consortium's HOME allocation will be used for homeowner repair, homebuyer assistance, and rental (primarily special needs populations) assistance. Please refer to preceding Item 4, pp. 4-5 for a list of resources available for the County's and the Consortium's housing objectives.

The County, the Consortium, and other partners will pursue additional opportunities to provide affordable housing, provided that they are consistent with Consolidated Plan priorities.

Needs of Public Housing

1. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.

Low cost rental housing has been, and will continue during the 2011 PY, be provided through various means. The following Public Housing Commissions and MSHDA assist almost 4,800 households in the MHC jurisdiction. There are few, if any resources available to expand the supply of public housing at this time, or even to help the various housing commissions maintain units or address management issues. Even so, however, the reader can see, from the following table, that there are a large number of units available through two rental assistance programs:

PHA	Low Rent Public Housing	Section 8
MSHDA	0	900
Clinton Township	100	21
Eastpointe	164	131
Mt. Clemens	288	0
New Haven	88	0
Roseville	102	309
Sterling Heights	153	41
Total	795	1,402
(Macomb CoC) HARP	0	351
Total	1690	3,163

There are, moreover, an undetermined number of families with Vouchers issued by housing commissions outside the MHC, which may have opted to obtain housing within the Consortium's jurisdiction. Their Agency Plans emphasize preservation and maintenance of existing units. We have also used HPRP to provide additional rental assistance to mitigate the consequences of job loss and prevent homelessness.

The County lacks sufficient resources to help any of the Macomb County housing commissions to repair and modernize their units. It should be noted that no MHC housing commissions is undertaking a program of resident initiatives.

Although there is no County-wide housing commission, the existing network of housing commissions and privately owned affordable rental developments, has made a large dent in addressing renter needs by providing decent and affordable housing for LI renter households, most of whom are, by regulatory fiat, extremely- or very-low-income.

2. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

The Clinton Township Housing Commission has open monitoring findings pertaining to its Section 8 Program, but not its Low Rent Public Housing Program, and is considered troubled by HUD. None of the other housing commissions in Macomb County have been so designated. The CTHC is not within the jurisdiction of the Urban County and the County cannot help CTHC, which is working to resolve the findings made by HUD.

Barriers to Affordable Housing

Describe the actions that will take place during the next year to remove barriers to affordable housing.

Macomb County has a variety of housing types in all price ranges. It does not control municipal decision-making, but advises communities about land use policies and controls, zoning ordinances, and other actions that can promote affordable housing. It also identifies trends and helps communities plan for them, e.g. a special report detailing the needs of a rapidly aging population, with results shared with municipalities so that they can factor design considerations into their ordinances. Other planned actions include:

- a) Continue implementing NSP1 to create affordable housing opportunities for eligible families. The County will have assisted 57 households purchase and occupy abandoned, foreclosed homes. Many, will have incomes \leq 80% AMI, with a substantial number \leq 50% AMI.
- b) Conclude the HPRP which provides affordable rental housing for families who have lost their incomes, and support services designed to help the homeless and at-risk populations,
- c) Continued implementation of the HOME-funded acquisition; acquisition, repair and resale; and specialized rental activities, as practicable.
- d) Continue collaboration with Habitat for Humanity to promote home ownership for LI families. The Consortium will assist as many as 25 additional families this year with HOME funding.
- e) The Consortium will continue to strengthen existing relationships, and add partners to increase affordable housing Macomb County. No projections can be made since funding decisions occur on an opportunistic basis.
- f) The County will ramp up its HOME substantial housing repair program, and continue CDBG assistance to address documented emergencies. County HOME funds should finance roughly 25 homes from this grant, and make the homes decent, safe, and sanitary. CDBG assistance should provide emergency repairs for up to 10 families whose homes have unforeseen emergencies that demand correction.
- g) Support, if possible, other reasonable proposals for affordable housing.

HOME

General Background and Special Information

Macomb County (and now the Consortium) have received almost HOME funding since 1992. A detailed cost breakdown between member communities is found in the attached projects file. No specific allocations have been made yet, as projects are selected after approval. It can reasonably be expected that the County's share will be used to rehabilitate homes owned and

occupied by LI households. No significant infusions of outside funding, apart from Match, are expected. The Program is expected to generate \$20,000 in program income this year.

Program Administration

The MHC will use \$130,5335 allocated for HOME administration (10% of the base grant) most of which will be used by the County and small portion reserved for partner administration.).

Match

The County has been able to obtain a significant level of Match Credit through collaboration with partners who bring non-Federal sources to the table. The MHC gives priority to proposals with the potential to generate significant and continuing levels of HOME Match. These requirements are written into contracts as a condition of funding.

Affirmative Marketing

The County affirmatively markets the Program when applicable. Any owner using MHC HOME funds for more than 5 units of rental housing must certify to the following conditions regarding the solicitation of tenants.

- use the Equal Opportunity logo, slogan or statement regarding affirmative marketing policy in all advertising;
- as appropriate, advertise, use media, including minority outlets, likely to reach persons least likely to apply for the housing;
- where there is a project sign, display the Equal Housing Opportunity logo; and
- notify the County when vacant rehabilitated units become available.

The County monitors rental projects to assure compliance. In the event of non-compliance, the County would remind the owner of fair housing laws and his contractual obligations, and work to rectify the problem. The County can also obtain advice from fair housing organizations or HUD.

To date, one project is potentially subject to Affirmative Marketing requirements, Solid Ground's transitional housing facility, which contains 14 units for families. Solid Ground, design to assist the homeless, cannot rigorously apply a traditional marketing model, and does not therefore affirmatively markets units as described above. It has, however, achieved a racial and ethnic mix of people.

W/MBE Contracting

The County employs licensed, insured contractors in its rehabilitation program and has used female-owned businesses, in a significant number of contracts, and dollars. The County seeks to attract MBE's through outreach through the Michigan Minority Business Development Council.

WBE participation is solid, and MBE participation has increased, primarily in professional services. The County continues recruitment efforts for W/MBE vendors and contractors.

1. Describe other forms of investment not described in § 92.205(b). *None.*
2. If the participating jurisdiction (PJ) will use HOME or ADDI funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.

The MHC uses the "recapture" method to ensure affordability over time, usually 5 or 15 years, depending on the amount of assistance provided.

3. If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum these guidelines must:

The Consortium does not intend to refinance existing debt on multi-family properties.

- a. Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.
 - b. Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.
 - c. State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
 - d. Specify the required period of affordability, whether it is the minimum 15 years or longer.
 - e. Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally designated Empowerment Zone or Enterprise Community.
 - f. State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.
4. If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives: [ADDI ended in 2008 and this question is not applicable.](#)
- a. Describe the planned use of the ADDI funds.
 - b. Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.
 - c. Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.

HOMELESS

Specific Homeless Prevention Elements

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

1. Sources of Funds—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction's plan for the investment and use of funds directed toward homelessness.

[Macomb County will house those made homeless and provide assistance by or through the following:](#)

- [concluding its HPRP grant,](#)
- [supportive housing and services through various programs funded by HUD and the State of Michigan, pursuant to the County's 10 Year Plan to End Homelessness,](#)
- [CDBG funding for emergency shelter assistance to 3 organizations,](#)

- CDBG funding to agencies who refer homeless and at-risk people for comprehensive needs assistance, and support (food, clothing, utility assistance, and household commodities),
- CDBG funding to agencies serving at-risk youth (abused, drug dependent, and troubled), abused women and their dependent children,
- CDBG and/or HOME assistance as appropriate and available, on an opportunistic basis, to support emergency, transitional, and permanent housing.

All of the above are provided through private non-profit partners working closely with the County and the Consortium. Detail concerning programs, the agencies funded, performance objectives, and the amount of funding anticipated can be found in **Tabs 1 and 2 of the Projects file** of this Plan.

2. Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.

The MHC 2009-2013 Con Plan addresses homeless and homelessness prevention in three separate priorities: #1 (foreclosures), #2 (housing), #4 (homeless prevention and services), and #5 (expand human services).

Detail as to how this Annual Plan will address the Strategic Objectives contained in the Consolidated Plan can be found under the immediately preceding question #1, although it should be noted that homelessness is also addressed through the various housing, public housing and community development programs and mentioned throughout this Annual Plan.

Obstacles have been identified, including:

- a dearth of funding for Macomb County, which has, despite a population of more than 850,000 and growing homelessness, sometimes received lesser funding than other cities and counties, even those with many fewer people. This is true of Federal and State programs.
- Changing priorities at the Federal level have adversely affected the ability of care providers to obtain needed support for their programs. Long-term decisions have been made based on Federal priorities, e.g. definitions of homelessness and which programs are best-suited to meeting those needs, only to them change and make obsolete carefully-crafted plans. This has occurred in the area of transitional housing and has put the provider at risk of failure and has, jeopardized a the Consortium's substantial HOME investment.

3. Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2012. Again, please identify barriers to achieving this.

As mentioned, the County, and the MHC, are served by the County's CoC which, through its Coordinator and member agencies to assist temporarily and chronically homeless families and individuals. This will occur through:

- continuing strategic and tactical planning by the CoC,
- continued applications for assistance made available by HUD, the State of Michigan, and other appropriate agencies,
- continuing coordination between the MHC, the County, and authorized sub-recipients to implement the County's HPRP,
- considering the feasibility of applications made by agencies to provide affordable transitional and permanent housing to homeless and at-risk populations,
- providing human services to address the root causes of homelessness.

4. Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.

The CoC will implement the goals and strategies contained in the 10 Year Plan to Eliminate Chronic Homelessness, and will seek and implement, if approved HUD, State of Michigan, foundation, and other appropriate sources of funding as they become available.

As described, Macomb County and the MHC will, through CDBG, HOME, and HPRP, collaborate with service agencies which provide temporary and (if possible permanent) shelter, emergency shelter and assistance to homeless individuals and those at risk of becoming so. It will also fund services designed to address root cause of homelessness and provide interim assistance to help those affected address daily needs.

5. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.

HUD has advised CDBG recipients that the discharge policy requirement applies to only ESG and HOPWA. This Urban County does not receive ESG/HOPWA funding.

Emergency Shelter Grants (ESG) NO ESG - section not applicable.

(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

COMMUNITY DEVELOPMENT

Community Development

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

1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.

The Con Plan addressed homeless needs and non-housing community development needs in two separate priority objectives:

Priority Objective #2 (p. 2 above) addresses the need to develop and maintain necessary public facilities and other infrastructure, specifically for LI and blighted areas of the County. The reader is referred to Table 2 B of the Con Plan for details.

Priority Objective #4 (p. 2 above) was addressed above (see Questions 1 and 2 of the immediately preceding page for detail).

Priority #7 (p.2 above) has not been discussed. The Consolidated Plan identifies economic development as a priority need due to the severe economic downturn. As a result, the County's Board of Commissioners substantially increased resources for Economic Development staffing, in 2006 and again in 2007. This trend has continued in 2011 with additional resources allocated for economic development by the County Executive. This activity has realigned the County in an organizational sense and has added several new business development positions, to be filled by experienced professionals.

Although not currently programmed for this purpose MCED could use CDBG funds to develop, attract and retain businesses. This will enhance economic stability and provide jobs for persons at all income levels.

2. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

*Note: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

The following describes short-term (1-3 years) and long-term (3-5 years) objectives:

Priority Objective #2 - Public Facilities and Infrastructure: Several projects will be undertaken, including streets, sidewalks, public beautification, parking facilities, senior centers, parks, water, sewer and drainage facilities, and fire facilities. All will comply with regulation 570.208. Long term, the County will complete 60 projects, improving life for hundreds of County residents.

Priority Objective's #3 and 6 - Homeless Prevention and Assistance, Maintain and Expand Essential Human Services: Short-term, the County will support operations at 4 homeless facilities, and 8 organizations providing emergency assistance to the homeless and those at-risk of becoming homeless. It will also assist senior services, youth services, health care, special needs transportation, and other services to necessary alleviate distress for hundreds of Macomb County families. Long-term, the County will fill gaps in the human service safety net.

Priority Objective #7 – The County will evaluate the feasibility of implementing activities to attract and/or retain businesses, particularly as they relate to providing jobs for persons coming from lower-income households. This will be accomplished through general and functional planning, and possibly improvements to buildings and infrastructure in commercial areas.

Antipoverty Strategy

Describe the actions that will take place during the next year to reduce the number of poverty level families.

The County, as mentioned, and consistent with Priority Objectives 3 and 4, will promote human services for LI persons. These promote positive life-styles which, in turn, increase chances for long-term emotional, familial, and employment stability. It will work with the following agencies:

- CARE, Care House, and Turning Point, to help families and children resolve destructive relationship issues thereby fostering long-term growth;
- Community Housing Network, Lighthouse Outreach, Macomb Warming Shelter, MCREST, Samaritan House, Solid Ground, St. Vincent de Paul, Solid Ground, and Turning Point to help special needs populations overcome emergencies and other challenges, offering them positive alternatives.
- The County Health Plan, moreover, provides medical coverage to people who might not otherwise receive it. These mitigate the effects of poverty and can help families escape it.
- The County spent \$2.4m in NSP funds to benefit VLI families buy foreclosed homes, thereby helping them attain a stable foundation for growth, and another \$2.5m in NSP3 funds to construct affordable rental housing for VLI elderly families.

Although the County's CDBG program does not directly address unemployment, business development, or job training, for reasons already mentioned, the County will continue its business development assistance program by advising small business investors and owners, including many LI individuals establishing micro-enterprises. This reduces poverty by promoting self-sufficiency and long-term employment.

Finally, the County works with the State of Michigan's Michigan Works! Program to promote employment through matching job seekers with businesses in need of qualified workers; and with the MHC, which provides a host of services, including housing counseling for those in need.

NON-HOMELESS SPECIAL NEEDS HOUSING

Non-homeless Special Needs (91.220 (c) and (e))

*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.

The Urban County and the CoC will address non-homeless special needs populations in accordance with Priority Objective #4, Providing and Expanding Essential Human Services and, to a lesser extent, in accordance with Priority Objective #1, Housing. This has already been reviewed previously.

Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

As mentioned, the County's Department of Community Mental Health receives Federal and State funding and distributes those funds to partner organizations to provide essential supportive services. This arrangement has been successful and is expected to continue in the future.

Housing Opportunities for People with AIDS

The Urban County, receives not HOPWA funding.

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

1. Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.

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2. Report on the actions taken during the year that addressed the special needs of persons who are not homeless but require supportive housing, and assistance for persons who are homeless.
 3. Evaluate the progress in meeting its specific objective of providing affordable housing, including a comparison of actual outputs and outcomes to proposed goals and progress made on the other planned actions indicated in the strategic and action plans. The evaluation can address any related program adjustments or future plans.
 4. Report on annual HOPWA output goals for the number of households assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. Include any assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.
 5. Report on the use of committed leveraging from other public and private resources that helped to address needs identified in the plan.
 6. Provide an analysis of the extent to which HOPWA funds were distributed among different categories of housing needs consistent with the geographic distribution plans identified in its approved Consolidated Plan.
 7. Describe any barriers (including non-regulatory) encountered, actions in response to barriers, and recommendations for program improvement.
 8. Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.
 9. Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.

Specific HOPWA Objectives

Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the Action Plan.

The Urban County does not receive HOPWA.

Other Narrative

Include any Action Plan information that was not covered by a narrative in any other section.

None.