

OAKLAND COUNTY, MICHIGAN AMENDMENT TO PY 2019 ANNUAL ACTION PLAN

Executive Summary

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

Introduction

Emergency Response - The onset of COVID-19 has created new priority needs. The substantial amendment to the PY2019 Annual Action Plan will allow the County to expend its allocation from the CARES Act to address emergency needs.

Summarize the objectives and outcomes identified in the Plan

Emergency Response - On March 27, 2020, The Coronavirus Aid, Relief and Economic Security Act (CARES Act), Public Law 116-136, was signed by President Trump. The CARES Act makes available supplemental Community Development Block Grant (CDBG-CV) and Emergency Solutions Grant (ESG-CV) funding for grants to prevent, prepare for, and respond to coronavirus (COVID-19). These grants provide flexibilities for Oakland County as a CDBG and ESG grantee to expedite the use of CARES Act funds to help address the challenges facing our nation during this historic public health crisis. The Oakland County first allocation of funds was \$3,166,997 (CDBG-CV) and \$1,155,293 (ESG-CV).

A Substantial Amendment to the PY 2019 Annual Action Plan is required for any newly funded activities, and usually a thirty (30) day public comment period is required. The U. S. Department of Housing and Urban Development (HUD) waived this comment period requirement provided that no less than five (5) days are provided for public comments on each substantial amendment. The CARES Act eliminated the cap on the amount of funds a grantee can spend on public services, removed the requirement to hold in-person public hearings in order to comply with national and local social gather requirements, and allowed grantees to be reimbursed for COVID-19 response activities regardless of the date costs were incurred. The bill also allowed grantees to apply for waivers of specific statutory regulations.

The CDBG-CV and ESG-CV funds allocated under the CARES Act may be used for a range of eligible activities that prevent and respond to the spread of infectious diseases such as the coronavirus disease (COVID-19). The proposed CDBG-CV activities must meet one of the three CDBG National Objectives as required by regulation. The ESG-CV funds must be used for eligible ESG purposes.

This amendment to the PY 2019 Annual Action Plan describes how the CDBG-CV and ESG-CV funds will be utilized locally to address the COVID-19 pandemic. CDBG programs recommended for funding in the amended PY 2019 Annual Action Plan include public services administered by Oakland County Community & Home Improvement to provide emergency rent/mortgage/utility assistance. The ESG-CV funds will be used to provide Administration, Homeless Management Information System (HMIS), Shelter Operations - Hotel Rooms, Shelter Operations-COVID Expenses and Homeless Prevention/Rapid Rehousing activities.

Oakland County Community & Home Improvement will administer the CARES Act funds. Prior to receipt of the funding from the U.S. Department of Housing and Urban Development (HUD) Office of Community Planning and Development, Oakland County prepared a formal substantial amendment to its PY 2016-2020 Consolidated Plan and PY 2019 Annual Action Plan. Oakland County also amended its citizen participation requirements as reflected in its amended Citizen Participation Plan.

CDBG-CV Description

Public Services - Subsistence Payment (Emergency Rent/Mortgage/Utility Relief) - Public services to assist with no more than three months of emergency payments for past-due rent, including mobile home lot rent, land contract payments, mortgage payments, homeowner association fees, and utilities (gas/electric/water) to stably house households and prevent homelessness when no other means to pay is available. Payments will include any additional charges due to delinquency such as late charges or court costs. Households who reside in an Oakland County CDBG participating community with a gross income less than 80% of area-median income may be eligible. Households must have a COVID-19 hardship. Delinquency must have occurred after April 1, 2020. A maximum of \$15,000 in subsistence payments is available per household. Beneficiaries will be allowed to receive assistance one time.

An application including self-attestation for income will be used. Applications including supporting documentation may be received in person or electronically.

Applicants will be strongly encouraged to meet with a housing counselor for further financial education and receive referrals. Applicants that do not qualify for CDBG-CV assistance will be provided with resource/referral information to other programs that may be of assistance.

A marketing plan will be developed and procedures to prevent duplication of services will be maintained for all CDBG-CV activities.

ESG-CV Description

Administration - Costs associated with the administration of ESG-CV funds.

Homeless Management Information System (HMIS) - The HMIS lead agency will receive funding for a two-year period to ensure vendors are trained on HMIS. This will include following all required protocols, collecting COVID related data elements and providing data for reporting purposes.

Shelter Operations - Hotel Rooms - Leasing of temporary shelters, including hotel rooms in lieu of rotating shelters. The hotel rooms are being used for those individuals who are recovering from COVID, who are symptomatic, or who require quarantine. Eligible expenses include the room, food, case management and supportive services. In addition, program supplies including but not limited to personal protection equipment (PPE), cleaning supplies, internet service and program operating costs such as insurance and financial processing are eligible expenses. The proposed budget compliments other resources received to cover maximum needs.

Shelter Operating Costs - Staff costs including hazard pay, cleaning supplies, PPE and medical related transportation costs.

Homeless Prevention and Rapid Rehousing Activities - Housing for households at or below 50% area median income affected by COVID-19 provided when no other funding is available. Activities will also assist those who are in motels to be re-housed as quickly as possible. Covers short- and medium-term rent (up to 24 months), security deposits, applications fees, utility deposits, case management. Program operational costs such as eligibility review, inspections and payment processing are included. Fund will complement other available community resources.

Procedures to prevent duplication of services will be maintained for all ESG-CV activities.

Activities funded with CDBG-CV and ESG-CV:

COVID-19 Related Activities		
Source/Responsible Entity	Activity	Amount
CDBG-CV/Oakland County	Public Services – Subsistence Payments (Emergency Rent/Mortgage/Utility Relief)	\$3,166,997
ESG-CV/Oakland County	Administration	\$25,000
	Homeless Management Information System (HMIS)	\$50,000
	Shelter Operations - Hotel Rooms	\$400,000
	Shelter Operations-COVID Expenses	\$125,000
	Homeless Prevention/Rapid Rehousing Activities	<u>\$555,293</u>
		<u>\$1,155,293</u>

Summary of Citizen Participation Process and consultation process

Emergency Response - A Substantial Amendment to the PY 2016-2020 Consolidated Plan, PY 2019 Annual Action Plan, and Citizen Participation Plan usually require specific public comment periods however, the U. S. Department of Housing and Urban Development (HUD) has waived this requirement provided that no less than five (5) days are provided for public comments on each substantial amendment.

In accordance with U. S. Department of Housing and Urban Development (HUD) guidelines, the proposed PY 2016-2020 Consolidated Plan amendment, PY 2019 Annual Action Plan amendment and Citizen Participation Plan amendment for Oakland County was published for public comment no less than 5 calendar days before being submitted to HUD.

Public comments regarding the activities funded to address COVID-19 prevention measures were encouraged and the email chi@oakgov.com was used to collect written comments. The Public Comment Period ran from Thursday, June 4 through Wednesday June 10, 2020.

Consultation was held on several occasions during the development of this substantial amendment with local service organizations, the Oakland Continuum of Care and members of the Oakland County HOME Consortium.

AP-10 Consultation - 91.100, 91.200(b), 91.215(I)

Emergency Response - The Oakland County Citizens Advisory Council hosted a public hearing on June 4, 2020. Notice of the public hearing, and availability of draft substantial amendments to the Consolidated Plan, PY2019 Annual Action Plan & Citizen Participation Plan were published on Thursday, May 28, 2020 to the county's website. The public comment period extended through June 10, 2020. Consultation was held on several occasions during the development of the amendments with local public service agencies, the Oakland Continuum of Care and the Oakland County HOME Consortium.

AP-12 Participation - 91.105, 91.200(c)

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

Emergency Response- On Thursday, May 28, 2020 the proposed draft PY 2016-2020 Consolidated Plan amendment, PY 2019 Annual Action Plan amendment and Citizen Participation Plan amendment were posted at: <https://www.oakgov.com/advantageoakland/communities/Pages/default.aspx>

Hard copies of the documents were available for pickup at the Oakland County Community & Home Improvement Division (OCCHID), 250 Elizabeth Lake Road Suite 1900, Pontiac, MI 48341-0414 by calling (248) 858-0493 Monday-Friday between 8:30 AM-3:00 PM. All interested persons were encouraged to provide written comments to the OCCHID, 250 Elizabeth Lake Road Suite 1900, Pontiac, MI 48341-0414 or by email at chi@oakgov.com prior to 5:00 p.m. on Wednesday June 3, 2020.

A virtual public hearing was hosted by the Oakland County Community & Home Improvement Citizens Advisory Council (CAC) on at 9:30 a.m. on Thursday, June 4, 2020 to obtain public comments concerning the required CARES Act amendments. The public hearing was posted in the Oakland Press, and on the County's Facebook page and at the county website.

Summarize citizen participation process and how it impacted goal setting

Emergency Response - Public hearing notices were emailed to the Oakland County Board of Commissioners, Citizens Advisory Council, Oakland County Continuum of Care list serve, participating communities, public service agencies and members of the Oakland County HOME Consortium.

Citizen Participation Outreach

Emergency Response - Comments received were supportive of the County's CDBG-CV and ESG-CV emergency response. Minutes of the June 4th public hearing along with copies of public comments received were submitted to the U.S. Department of Housing and Urban Development.

AP-15 Expected Resources – 91.220(c)(1,2)

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG-CV	Public-Federal	Emergency response for the prevention and preparation for the COVID-19 Pandemic	\$3,166,997	0	0	\$3,166,997	N/A	CDBG-CV funds to be used to prevent, prepare for, and respond to the coronavirus.
ESG-CV	Public-Federal	Emergency response for the prevention and preparation for the COVID-19 Pandemic	\$1,155,293	0	0	\$1,155,293	N/A	ESG-CV funds to be used to prevent, prepare for, and respond to the coronavirus.

Table 5 - Expected Resources – Priority Table

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

Emergency Response - HUD has specific requirements regarding the prohibition on duplication of services with other private, state and local funds. There are no matching requirements.

AP-35 Projects – 91.220(d)

Projects

Emergency Response - The CV projects #18 and #19 were considered by the Oakland County Community & Home Improvement Citizens Advisory Council at their June 4, 2020 meeting as a substantial amendment to the PY 2019 Annual Action Plan. The approval was proceeded by a public hearing.

#	PROJECT NAME
1	CDBG ADMINISTRATION
2	CDBG HOUSING REHABILITATION/REVOLVING LOAN FUND ESTIMATE
3	CDBG HOUSING REHABILITATION/HIP DIRECT PROJECT COSTS
4	CDBG PUBLIC SERVICES HOUSING COUNSELING
5	CDBG PUBLIC SERVICES BATTERED AND ABUSED
6	CDBG MOBILE HOME MINOR HOME REPAIR
7	CDBG CLEARANCE AND DEMOLITION
8	CDBG CODE ENFORCEMENT
9	CDBG MINOR HOME REPAIR
10	CDBG PUBLIC FACILITIES AND INFRASTRUCTURE
11	CDBG PUBLIC SERVICES
12	HOME ADMINISTRATION/PROGRAM INCOME ESTIMATE
13	HOME HOUSING REHABILITATION
14	HOME CHDO RENTAL
15	HOME CHDO OPERATING EXPENSES - RENTAL ACTIVITIES
16	ESG ADMINISTRATION AND ESG HOMELESSNESS
17	HOME CHDO HOMEBUYER
18	CDBG - CV EMERGENCY RESPONSE
19	ESG - CV EMERGENCY REPOSE

Table 7 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

Emergency Response - In response to COVID-19, the County identified additional priority needs and will allocate emergency response funding to projects that will stably house households and prevent homelessness.

AP-85 Other Actions - 91.420, 91.220(k)

Actions planned to reduce the number of poverty-level families

Emergency Response - The County has identified additional priority needs and will allocate funding to emergency response programs to stabilize existing housing and prevent homelessness.