

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		
* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision		
* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>		
* 3. Date Received: <input type="text"/>		4. Applicant Identifier: <input type="text" value="M-21-DP-26-0210"/>
5a. Federal Entity Identifier: <input type="text"/>		5b. Federal Award Identifier: <input type="text"/>
State Use Only:		
6. Date Received by State: <input type="text"/>		7. State Application Identifier: <input type="text"/>
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="County of Oakland, Michigan"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="386004876"/>		* c. UEI: <input type="text" value="HZ4EUKDD7AB4"/>
d. Address:		
* Street1: <input type="text" value="250 Elizabeth Lake Road"/>		
Street2: <input type="text" value="Suite 1900"/>		
* City: <input type="text" value="Pontiac"/>		
County/Parish: <input type="text" value="Oakland"/>		
* State: <input type="text" value="MI: Michigan"/>		
Province: <input type="text"/>		
* Country: <input type="text" value="USA: UNITED STATES"/>		
* Zip / Postal Code: <input type="text" value="48341-0414"/>		
e. Organizational Unit:		
Department Name: <input type="text" value="Health and Human Services"/>		Division Name: <input type="text" value="Neighborhood & Housing Develop"/>
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text" value="Mr."/>		* First Name: <input type="text" value="Shane"/>
Middle Name: <input type="text"/>		
* Last Name: <input type="text" value="Bies"/>		
Suffix: <input type="text"/>		
Title: <input type="text" value="Manager"/>		
Organizational Affiliation: <input type="text"/>		
* Telephone Number: <input type="text" value="248 858-5403"/>		Fax Number: <input type="text" value="248 858-5311"/>
* Email: <input type="text" value="biess@oakgov.com"/>		

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnerships Program

* 12. Funding Opportunity Number:

M21-DP260210

* Title:

Home Investment Partnerships Program

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

See attachment

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Non-congregate shelter development and/or rehabilitation, supportive services for eligible households, non-profit operating/capacity building support for eligible non-profits.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="10,396,043.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value=""/>
* g. TOTAL	<input type="text" value="10,396,043.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email:

* Signature of Authorized Representative:

*David Coulter**David T. Woodward** Date Signed:

David Coulter (Dec 12, 2022 09:32 EST) David T. Woodward (Dec 12, 2022 09:59 EST)

Dec 12, 2022

HOME-ARP Allocation Plan Template with Guidance

Instructions: All guidance in this template, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program*, unless noted as optional. As the requirements highlighted in this template are not exhaustive, please refer to the Notice for a full description of the allocation plan requirements as well as instructions for submitting the plan, the SF-424, SF-424B, SF-424D, and the certifications.

References to “the ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a PJ must consult with:

- CoC(s) serving the jurisdiction’s geographic area,
- homeless service providers,
- domestic violence service providers,
- veterans’ groups,
- public housing agencies (PHAs),
- public agencies that address the needs of the qualifying populations, and
- public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Describe the consultation process including methods used and dates of consultation:

Neighborhood & Housing Development Manager, Shane Bies, hosted, attended, and presented at meetings that consisted of a variety of groups representing the stated QPs and adjacent. Information regarding HOME-ARP allowable activities, spending timeframe and restrictions, and options for how to give feedback were presented.

- HOME Consortium – July 8, 2021
- Citizen Advisory Council – October 26, 2021
- Citizen Advisory Council – February 2, 2022
- Citizen Advisory Council – June 23, 2022
- Citizen Advisory Council – November 10, 2022
- Shelter Providers – August 4, 2022
- Alliance for Housing and Potential Use of CE for NCS – August 30, 2022
- Homeless Healthcare Collaboration – August 12, 2022
- Meeting with Various Groups – September 21, 2022

- Meeting with Public Housing Agencies and others – September 22, 2022
- Fair Housing Center of Metro Detroit – November 28, 2022

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
HOME Consortium	Citizens of their municipality. Other partner program jurisdictions (CDBG grantees that partner within a HOME Consortium)	Meeting 7/8/2021 & Request for feedback to draft plan via email 12/14/22	See Alexandra Borngesser comment below
Citizens' Advisory Council	Advises on CDBG, HOME & ESG related funding which is viewed across all QPs. Community based group comprised of commissioners, CVTs, community orgs, citizens. Includes Alliance, homeless shelter providers, CHDO, FQC among others	Meeting 10/26/2021, 2/2/2022, 6/23/2022, 11/10/2022	
Lighthouse of MI	Homeless, At Risk of Homelessness, Other Populations, Food assistance, transitional housing	Shelter providers consultation meeting 8/4/2022	
Alliance for Housing of Oakland County	Continuum of Care lead entity, across all QPs	Shelter providers consultation meeting 8/4/2022; One on one consultation as CoC 8/31/2022	See Leah McCall comment below
South Oakland Citizens for the Homeless/Welcome Inn	Homeless, Transitional housing	Shelter providers consultation meeting 8/4/2022	
HOPE Hospitality	Homeless, At Risk of Homelessness, Other Populations	Shelter providers consultation meeting 8/4/2022	

HAVEN, Inc	Domestic violence and human trafficking	Shelter providers consultation meeting 8/4/2022	
Homeless Healthcare Collaborative	Homeless, At Risk of Homelessness, Transitional Housing, Other populations. Reps from healthcare, shelters, service provider agencies, gov representatives, health division, and representatives of the lead agencies	Meeting 8/12/2022	
Community Housing Network	Homeless, At Risk of Homelessness, Other Populations, transitional housing, disability housing	Community Organization consultation meeting 9/21/2022	See Marc Craig comment below
Samaritas	At risk of homelessness, other populations. Refugee resettlement agency that works within rental/affordable housing including housing choice voucher holders, also develops housing for refugees and seniors	Community Organization consultation meeting 9/21/2022	
Pontiac Housing Commission	At risk of homelessness, other populations	Public Housing Assistance Consultation meeting 9/22/2022	
Ferndale Housing Commission	At risk of homelessness, other populations	Public Housing Assistance Consultation meeting 9/22/2022	
Fair Housing Center of Southeast Michigan	Organization that addresses fair housing, civil rights, and needs of persons with disabilities. This will serve protected classes that they serve	Virtual meeting 11/28/22	

	as well – majority single, female, many with children. Very consistent with their mission.		
Invited but did not attend			
The ARC of Oakland County	Disability population across all QPs		
Southfield Public Housing Authority	At risk of homelessness, other populations		
Royal Oak Township Public Housing Authority	At risk of homelessness, other populations		
Oakland Livingston Human Service Agency (OLHSA)	Human services across all QPs		
Disability Network of Eastern Michigan (DNEM)	Disability population across all QPs		

Summarize feedback received and results of upfront consultation with these entities:

Leah McCall, Executive Director, Alliance for Housing

I support the plan to increase non-congregate shelter space but the additional point for this funding is as important. If possible, we want to prevent homelessness with prevention assistance, if homeless have open shelter space, then quickly connect to affordable housing.

Marc Craig – President Community Housing Network via email 10/11/2022

I would support the plan to use a portion of the funding for creating de-congregated shelter beds. I would urge the County to have smaller shelter locations scattered around the county, as opposed to building more beds in Pontiac.

While ideally, I would prefer to reduce our dependence on shelters because I believe that they are inherently traumatizing, creating viable alternatives is a long-term proposition which will require a substantial number of resources. Meanwhile, there is a dramatic shortage of shelter capacity, and much of the existing capacity is more congregated than it could be.

If funds are available, I would also support the use of funds for tenant based rental assistance specifically targeted to people with disabilities. This population has been particularly hard hit by the pandemic, along with the dramatic increase in rental costs in the county.

Alexandra Borngesser – Director of Grants & Philanthropy at City of Pontiac

Thank you for sharing this information with us. After consulting with my colleagues, we feel that given the need to develop/acquire non-congregate shelters, and with currently so few providers, \$250,000 non-profit operating support and \$250,000 in non-profit capacity building is too little. The program allows a maximum of 5% for each of these items and we feel that the budget should be closer to that statutory limit.

Thank you for allowing us the opportunity to give feedback, we appreciate your work on this.

Steve Tomkowiak, Fair Housing Center of Metropolitan Detroit

- Was surprised to learn that we do not have non-congregant shelters.
- What is the most important activity we could support with this money?
- Steve “strongly likes this plan.”
- This will serve protected classes that they serve as well – majority single, female, many with children. Very consistent with their mission.
- Knows it will take a longer period of time to implement but needed.
- Will this be concentrated in Pontiac, or will there be some need met in other areas of the County?
- Commented on centralized homeless shelters in Pontiac are a barrier to south Oakland residents.

Oakland County Citizens’ Advisory Council

Reminded of the need for rental assistance and to try and include Public Housing Agencies if possible with HOME ARP funds.

GENERAL COMMENTS/QUESTIONS FROM ALL THE CONSULTATIONS:

Q: In relation to non-congregate shelter, is there a component that is transitional housing as part of that? Supply as many shelters as you like but if you don’t offer transition for them, what is the purpose.

Q: How narrowly defined is vulnerable populations?

Q: Can you tell us a little bit about how the homeless veteran community can be supported?

Q: Is there a timeframe that county really wants to see the funding spent, given that it is 9-year deadline.

Q: Heard that MSHDA was contemplating making some money available for non-congregate shelter development and possibly for other allowable. Haven’t done yet and not anything on horizon that we know of yet. Has Shane heard anything about it yet?

Public Participation

In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive, and
- The range of activities the PJ may undertake.

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

- ***Date(s) of public notice: 10/31/2022***
- ***Public comment period: start date - 10/31/2022 end date - 11/15/2022***
- ***Date(s) of public hearing: 11/10/2022***

Describe the public participation process:

Public hearing notice was posted on oakgov.com/nhd website, shared with partners, announced in the printed and web editions of the paper of record for Oakland County, meeting of the Citizens' Advisory Council, public comment period ran concurrently, community partners were alerted.

Describe efforts to broaden public participation:

Public hearing notice was posted on oakgov.com/nhd website, shared with partners, announced in the printed and web editions of the paper of record for Oakland County, meeting of the Citizens' Advisory Council, public comment period ran concurrently, community partners were alerted including immigrant advocacy groups, community foundations, human service organizations, shelter providers, emergency food providers, sheriff community engagement liaison, and others. The immigrant and community groups (outside of the shelter providers) have not traditionally been involved in the department efforts until 2020 under a new County Executive.

Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:

No comments were received

Summarize any comments or recommendations not accepted and state the reasons why:

Any and all comment or recommendations would be accepted and reviewed and balanced with other input during consultation and citizen participation process.

Needs Assessment and Gaps Analysis

In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	56	25	120	#	4								
Transitional Housing	67	23	25	#	0								
Permanent Supportive Housing	300	84	343	#	51								
Other Permanent Housing	207	47	29	#	0								
Sheltered Homeless						161	123	6	25				
Unsheltered Homeless						0	32	3	1				
Current Gap										-38	5	-10	#

Suggested Data Sources: 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

Describe the size and demographic composition of qualifying populations within the PJ's boundaries:

Homeless as defined in 24 CFR 91.5

The most recent Point In Time count conducted by Alliance for Housing and the Continuum of Care shows over 1,200 homeless. These are persons experiencing literal homelessness, residing on the street, in a shelter, in a safe haven, transitional housing or a place not meant for habitation. This can often be an undercount given the survey difficulties of the Point in Time count (e.g. enough volunteers to conduct the count, weather impact, etc.). Persons experiencing homelessness are disproportionately Black or African American at 61%, compared to 14% for the county overall. Persons with disabilities are impacted at higher rates by homelessness than the non-disabled population. Only 14% of all persons experiencing homelessness have a disability, compared to 12% in the County. However, the data warehouse only counts disabilities if they are identified by Emergency Shelter, Transitional Housing or Street Outreach projects which is believed to severely undercount the number of persons with disabilities experiencing homelessness or at risk of homelessness.

Oakland County has two existing overnight shelters. One of which, up until now, has served adult singles (20 beds) and families (10 beds). Going forward, that shelter will focus on serving families so this creates a new need for sheltering more single adults, with the loss of 20 beds. During COVID, with the influx of additional funding, (79) overflow beds were used for motel sheltering. With the loss of COVID dollars, those beds are no longer available. The second existing shelter serves single adults in one location with a congregate setting. It also has an additional location with beds in its recuperative shelter. Starting in December of 2022, with newly acquired funding, a new third seasonal overnight shelter (congregate setting as well) will open to shelter adults only who access the services of their day shelter program. This overnight shelter will initially provide 20 beds. While these 20 beds would appear to make up for the 20 lost, Oakland County shelters are generally full, turning away singles and families most every night.

At Risk of Homelessness as defined in 24 CFR 91.5

McKinney Vento for students defines homelessness slightly different from HUD's standard definition. The McKinney Vento defines a homeless student as one who lacks a fixed, regular and adequate nighttime residence, so this includes both Category 1 (literally homeless) and Category 2 (those doubled-up). It is reported that approximately 70-72% of homeless students are Category 2 (doubled-up).

Oakland Schools reports that annually in Oakland County, an estimated 6,000 students are homeless based on economic insecurity/economic disadvantage.

Also, in the 3 years leading up to COVID, between 2,200-2,600 students annually were identified by public schools as homeless. The number of identified students decreased during the pandemic, likely due to challenges identifying students via remote learning platforms as well as a reduction in evictions due to the moratorium. During the last two years, 1,300 homeless students were identified with about 935 identified as being doubled up each year. The beginning of the 2022-2023 academic

year has seen an increase in identified students likely due to the end of the eviction moratorium and the increases in rental costs experienced countywide.

With the influx of COVID dollars, through the Covid Emergency Rental Assistance (CERA) program, Alliance for Housing and the Continuum of Care were able to help 15,000 persons with rental assistance payments including arrears who fall under Category 2. That program has unfortunately ended, and there are few resources to assist those who are doubled up or are couch-surfing.

According to the most recent CHAS data available (2015-2019), there is an estimate 48,565 households in Oakland County that live at or below 30% of the HUD Area Median Family Income. All of these households also report at least one housing problem as defined by HUD. Given that the CHAS data also shows that 24% (121,920) of all Oakland County household are Cost Burdened (>30%), there are many households that are at risk of homelessness in Oakland County.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

Oakland County has one Domestic Violence (DV) Shelter in our community which has 52 beds for singles and families in a mostly non-congregate setting.

A recent HMIS report identified 36 persons answered Yes to “Are you currently fleeing domestic violence?” Upon doing the Danger Assessment (DA), case managers are reporting more persons eligible for Category 4.

One of the CoC providers will be starting their DV-Rapid ReHousing (DV-RRH) project this year. This will expand an existing RRH project to include 30 year-round scattered site, RRH rental assistance beds specifically for DV. This will increase housing as assistance for DV survivors within the community, in addition to rental assistance, with stabilization services, financial coaching and overall adding more capacity for housing assistance in the community, which is greatly needed.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

On the Alliance for Housing prioritization registry, there are 205 literally homeless individuals who have been referred, some as early as 2021 to present, who are waiting for a housing opportunity. 15 of those remain on the shelter list, created during COVID for those with lower prioritization “scores,” who were assisted due to the influx of COVID money into the community. That shelter list can no longer be used as the money has dwindled and cannot be assisted with further rental assistance.

The HARA reports receiving 30,901 calls and closed 28,457 since Oct 1, 2021. They received a 50% increase in calls since CERA portal closed June 30 compared to this time last year.

There are numerous callers in the queue, awaiting a callback to be screened who could be eligible for housing services across all the HUD defined homeless categories. This information suggests that the need for assistance is still great. The HARA reports these needs from callers they have screened:

- 1) Increase in calls stating landlords are evicting since they are no longer receiving CERA funding.
- 2) Denied CERA and is being evicted
- 3) Shelters are full and need emergency hotel funding
- 4) Need affordable housing unit lists
- 5) Section 8 status
- 6) Service agency calls wanting to know the housing process
- 7) Homeless in car or place not meant for human habitation
- 8) Couch surfing
- 9) Looking for resources
- 10) Holiday food gift baskets and presents for kids

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing (Optional):

There are a very limited number of permanent non-congregate shelter beds available in Oakland County. Most of these beds support persons fleeing domestic violence and smaller number of the beds support single adults discharged to “home” after hospitalization.

Oakland County Board of Commissioners and the County Executive also recently appropriate \$10 million SLRF-ARPA funds to support affordable housing unit development (rental or homeownership). An additional \$1 million of annual HOME funding goes to support affordable rental unit development.

Oakland County Board of Commissioner and the County Executive approved additional SLRF-ARPA funds to assist with eviction & foreclosure legal representation (\$2 million), critical and essential home repairs in qualified census tracts (\$2 million) and a landlord mitigation fund (\$315,000).

While the need outstrips the resources, there does currently exist some Permanent Housing and Transitional Housing funding (supported in part by the Emergency Solutions Grant).

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

There is currently some ESG funding to support shelter operations and HPRP/TH programs, but the need goes beyond the currently available resources. There are very limited number of non-congregate shelter beds available in Oakland County and many of those support only persons fleeing domestic violence.

At Risk of Homelessness as defined in 24 CFR 91.5

While there are a large number of households in Oakland County that are cost burden, there recently has been almost \$100 million used to pay back rent to rental households, \$2 million for legal representation during eviction & foreclosure process, \$10 million one time investment and \$2 million annually in the new Housing Trust Fund in addition to \$1 million annually of HOME funds for affordable rental development.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

There currently exists a 52 bed recently developed non-congregate shelter for persons fleeing domestic violence in Oakland County.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice

While more funding can always be helpful, there are a number of funding sources and existing programs at Oakland County and local services agencies to support job training, assist with utility payments, and support healthcare costs (e.g. Oakland 360 partnership with a local Federally Qualified Health Center).

Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

Even if all current shelter space in Oakland County is taken into consideration (e.g. permanent space, temporary space, congregate, non-congregate, etc.), there is not nearly enough shelter space to cover the estimated 1,200 literal homelessness persons in Oakland County. When permanent non-congregate space is considered, there is practically no units available.

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:

Not applicable

Identify priority needs for qualifying populations:

The development and/or rehabilitation of non-congregate shelter units and the capacity building and/or operating support of associated non-profit shelter operators has been identified as priority needs.

Explain how the PJ determined the level of need and gaps in the PJ’s shelter and housing inventory and service delivery systems based on the data presented in the plan:

The following items were considered when assessing priority:

- Current and recent financial support for a various housing needs (e.g. rental assistance, home repairs, eviction prevention, etc.) from multiple different funding sources (e.g. HOME, SLRF-ARPA, ESG, etc.) were assessed.
- The unique and one-time nature of HOME-ARP allowable activities. For example, even though Oakland County doesn’t currently have a Tenant Based Rental Assistance program, this is an activity that could be created in the future with ‘regular’ HOME funding whereas non-congregate shelter development/rehabilitation cannot.
- Consultation input from a variety of shelter operators, non-profit service agencies and local officials.
- The limited number of currently available non-congregated available shelter beds.

HOME-ARP Activities

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

Oakland County will solicit Request For Proposals (RFPs) for non-congregate shelter development or rehabilitation in accordance with Oakland County procurement policies and within HOME-ARP guidelines. RFPs will also be solicited for non-profit operating and capacity building support funds to all non-profits operating or that would be operating a shelter, supporting shelter guests or able to administer HOME-ARP supportive service programs to prevent homelessness in all qualifying populations.

Describe whether the PJ will administer eligible activities directly:

Oakland County Neighborhood & Housing Development Division does not intend to directly administer any services or eligible activities. Oakland County will solicit/select successful RFPs for funding and establish contracts with third party non-profits to complete the eligible activities.

If any portion of the PJ's HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

Oakland County will not be contracting with any third party to directly administer the overall HOME-ARP program.

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 500,000		
Acquisition and Development of Non-Congregate Shelters	\$ 8,396,043		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 0		
Non-Profit Operating	\$ 250,000	2.4 %	5%
Non-Profit Capacity Building	\$ 250,000	2.4 %	5%
Administration and Planning	\$ 1,000,000	9.6 %	15%
Total HOME ARP Allocation	\$ 10,396,043		

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

Oakland County distribute HOME-ARP funds on a reimbursement basis. After establishing contracts with successful non-profit applicants, invoices and supporting documentation will be provided to Oakland County at agreed upon time intervals. The materials will be reviewed for accuracy and allowability by Oakland County staff before drawdown of HOME-ARP funds and payment to contractor.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

Below are a few of the main characteristics of shelter/housing needs, service delivery system, and community needs that supports the Program Jurisdictions intent to support non-congregate shelter development/rehabilitation, non-profit operating/capacity building expenses and supportive services.

- Additional funding exists (e.g. new funding to support the Housing Trust Fund) or has recently been used (e.g. Covid Emergency Rental Assistance) to assist renters and homeowners (e.g. Home Improvement Program).
- Limited non-congregate shelter space currently exists in the Program Jurisdiction. What non-congregate shelter space currently exists specializes in only partially supporting QPs (e.g. persons fleeing domestic violence).
- A much larger population of persons experiencing homelessness exists that can be supported by congregate or non-congregate shelter beds.
- Continuum of Care (i.e. Alliance for Housing) has strong relationships with current shelter and warming center providers.
- Though some limited funding exists through the ESG and other funding sources for local non-profits and shelter operators, more funding would initially be necessary for scaling up shelter operations before transitioning to a more sustainable funding source. Funding transition and stability plans would be requested and reviewed during the RFP process.
- One local shelter has recently (within the last ten years) developed non-congregate shelter beds/units and would likely not need funding for rehab or development. Their shelter guests and other QPs could benefit from the broad array of eligible Supportive Services allowable within the HOME-ARP notice.

Preferences

A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A *preference* permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A *method of prioritization* is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. For example, in a project with a preference for chronically homeless, all eligible QP applicants are selected in chronological order for a HOME-ARP rental project except that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

Please note that HUD has also described a method of prioritization in other HUD guidance. Section I.C.4 of Notice CPD-17-01 describes Prioritization in CoC CE as follows:

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

If a PJ is using a CE that has a method of prioritization described in CPD-17-01, then a PJ has preferences and a method of prioritizing those preferences. These must be described in the HOME-ARP allocation plan in order to comply with the requirements of Section IV.C.2 (page 10) of the HOME-ARP Notice.

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit**

HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan.

For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan. Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

Not applicable

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Not applicable

Referral Methods

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page 10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;
2. the CE does not include all HOME-ARP qualifying populations; or,
3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these

preferences and priorities, the PJ **must** include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):

Not applicable

If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):

Not applicable

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):

Not applicable

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):

Not applicable

Limitations in a HOME-ARP rental housing or NCS project

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no

otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

The PJ does not intend to limit eligibility. While some NCS projects may focus more on serving certain populations (e.g. single adults, families, etc.), all will be capable of *initially* accepting all qualifying populations assuming space is available. Thereafter the various shelters will work within the Continuum of Care and with Alliance for Housing to ensure transfer of shelter guests to the most appropriate shelter location.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

The PJ does not intend to implement a limitation.

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

Not applicable

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.


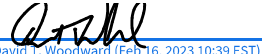
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles 11 and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-1 33, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL David Coulter/David T. Woodward  		TITLE County Executive/Chairperson, Board of Commissioners	
APPLICANT ORGANIZATION County of Oakland, Michigan		DATE SUBMITTED Feb 16, 2023 Feb 16, 2023	

ASSURANCES - CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.



As the duly authorized representative of the applicant, I certify that the applicant:

- 1 Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of the project described in this application.
- 2 Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
- 3 Will not dispose of, modify the use of, or change the terms of the real property title, or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal interest in the title of real property in accordance with awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
- 4 Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
- 5 Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progress reports and such other information as may be required by the assistance awarding agency or State.
- 6 Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- 7 Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
- 8 Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
- 9 Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
- 10 Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

- 11 Will comply, or has already complied, with the requirements of Titles 11 and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- 12 Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
- 13 Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction sub-agreements.
- 14 Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 15 Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the

National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-1 33, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL David Coulter/David T. Woodward   <small>David T. Woodward (Feb 16, 2023 10:39 EST)</small>		TITLE County Executive/Chairperson, Board of Commissioners	
APPLICANT ORGANIZATION County of Oakland, Michigan		DATE SUBMITTED Feb 16, 2023 Feb 16, 2023	

HOME-ARP CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

Uniform Relocation Act and Anti-displacement and Relocation Plan --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, 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 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, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying 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.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

Section 3 --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

HOME-ARP Certification --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.



Signature of Authorized Official
David Coulter
County Executive

Feb 16, 2023

Date



David T. Woodward (Feb 16, 2023 10:39 EST)

Signature of Authorized Official
David T. Woodward
Chairperson, Board of Commissioners

Feb 16, 2023

Date

AFFIDAVIT OF PUBLICATION
2125 Butterfield Dr, Suite 102N • Troy MI 48064

OAKLAND CTY NEIGHBORHOOD HOUSING DEV
250 Elizabeth Lk Rd STE 1900

Pontiac, MI 48341
Attention: Melanie Grund

STATE OF MICHIGAN,
COUNTY OF OAKLAND

The undersigned Ginny Slater, being duly sworn the he/she is the principal clerk of Oakland Press, theoaklandpress.com, published in the English language for the dissemination of local or transmitted news and intelligence of a general character, which are duly qualified newspapers, and the annexed hereto is a copy of certain order, notice, publication or advertisement of:

OAKLAND CTY NEIGHBORHOOD HOUSING DEV

Published in the following edition(s):

Oakland Press 11/01/22
theoaklandpress.com 11/01/22

VICKI ARSENAULT
NOTARY PUBLIC - STATE OF MICHIGAN
COUNTY OF OAKLAND
My Commission Expires May 11, 2026
Acting in the County of _____

NOTICE OF PUBLIC HEARING & PUBLIC COMMENT PERIOD
Oakland County DRAFT HOME American Rescue Plan (ARP) Program Funding Priorities
MONDAY, OCTOBER 31, 2022

The Oakland County Neighborhood & Housing Development Division is finalizing its plan for use of the HOME American Rescue Plan (ARP) Program funding. The Division is seeking input from the public on the available funds.

Proposed Allocation to the FY 2022 Annual Action Plan for HOME-ARP Activities and Use of HOME-ARP Funds

Activities	Allocation
Administration & Planning	\$1,000,000
Acquisition & Development of Non-Congregate Structures	\$6,350,000
Non-Profit Operating	\$250,000
Non-Profit Capacity Building	\$250,000
Supportive Services	\$250,000
Total	\$11,300,000

The HOME-ARP plan will be available for a 15-day public review and comment period from Monday, October 31, 2022, through and including Tuesday, November 15, 2022, at www.oaklandcountymichigan.gov/arp.

A hard copy will be available in the office if needed, and translation can be accommodated if requested.

Public Comment will be accepted via mail, drop off, or email to nhd@oakgov.com (please add "Public Comment" in the subject line). If mailing or dropping off, please use:

Oakland County Neighborhood & Housing Development, 250 Elizabeth Lake Road, Suite 1900, Pontiac, MI 48341-4014

NOTICE OF PUBLIC HEARING

Concurrently, notice is hereby given that the Citizens' Advisory Council will host a Public Hearing on the county's HOME-ARP proposed prioritization on Thursday, November 10, 2022, at 12:00 p.m. for the purpose of hearing public comments. The event is in person in Conference Room A at the Board of Commissioners building, 1200 N. Telegraph Rd., Pontiac, MI 48341.

There will not be a virtual option; however, if a member of the public would like their comments to be on record for the proceedings and are unable to attend, they may mail, drop off, or email their comments to be read into the proceedings by close of business on Wednesday, November 9, 2022. The Division is open until 2:00 p.m.

If you require special accommodations because of a disability, please contact Oakland County Neighborhood & Housing Development at 248-646-6400 or TDD Hearing Impaired (248) 654-8822 at least three (3) business days in advance of the meeting.

Public comments will be accepted via mail, drop off, or email to nhd@oakgov.com (please add "Public Comment" in the subject line). If mailing or dropping off, please use:

Oakland County Neighborhood & Housing Development, 250 Elizabeth Lake Road, Suite 1900, Pontiac, MI 48341-4014

Sworn to the subscribed before me this 2 Nov 2022

Vicki Arsenault
Notary Public, State of Michigan
Acting in Oakland County

Advertisement Information

Client Id: 552772

Ad Id: 2396449

PO:

Sales Person: 200309