



Fifth Program Year Action Plan

The CPMP Fifth 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 5 Action Plan Executive Summary:

The Annual Plan for Clinton Township with \$512,523 includes 14 projects that benefit low/moderate income citizens of Clinton Township. The objectives of the plan include the following: a high priority to maintain existing owner-occupied housing stock rehabilitation, housing support services and neighborhood improvement programs. The outcome of these programs includes a strengthening of the low/moderate income housing stock and services to permit homeowners to reside in their homes.

The CDBG program has assisted approximately 15 homeowners with rehab and 50 homeowners with chore services, allowing these individuals to stay in their homes. Also, the Township funded Turning Point which housed 16 abused and battered families with children and MCREST which housed 52 homeless for up to 90 days in local churches.

As part of the process of involving citizen participation in the planning process for the 2013 Action Plan of the Consolidated Plan, a Public hearing was held on March 11, 2013 at a Township Board meeting. The Notice of Public Hearing was published in the Macomb Daily Newspaper. Notification was also broadcast on the local cable channel; at the meeting, which was televised live and rebroadcast two times on the local cable channel, there were many groups that presented requests for Block Grant Funding.

Numerous telephone inquires were taken by the Planning Department prior to the meeting.

The Planning Department received funding requests from eight non-profit agencies. All funding requests were presented to the Township Board of Trustees on April 8, 2013, at which time they were allocated. All of the funding was 100% allocated to low/moderate income persons.

On April 17, 2013, the Proposed Consolidated Plan One-Year Action Plan 2013 was published in the Macomb Daily Newspaper. Public comments were solicited for 30 days. No comments were received. The Township received notification of the actual allocation of \$512,523 in late May 2013. At a Township Board meeting on June 17, 2013, the Township increased each project approximately 10.7% from the estimated amount of \$462,666 utilized to begin the planning process.

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.
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.
3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.
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.

Program Year 5 Action Plan General Questions response:

1. The Action Plan indicates minorities, particularly African-Americans, are likely to have lower incomes and potentially larger housing problems than non-minorities. To that end, the 2013 Action Plan has allocated considerable resources to housing rehabilitation, recreation program and infrastructure improvements in two target neighborhoods: Quinn Road and Colchester, which is in the south Gratiot/Quinn Road area and northeast of Mt. Clemens.
2. The two communities contain almost 70% of the Township's African-American population. The housing rehabilitation program has allocated \$260,490. Additional funds are available because of program income generated which is allocated automatically to housing rehab and is available to lower income households on a township-wide basis. A significant portion of the housing rehabilitation has occurred within the Quinn Road and Colchester areas. This pattern is expected to continue.
3. The recreation program will be offered within those targeted communities. This program therefore ensures that under-served segments of the population receive benefit for Program activities. An amount of \$57,000 has been allocated to this program. The Chore Program for seniors of \$11,000 is Township-wide. The homeless prevention programs such as Rehabilitation and Chores provide assistance and make housing affordable to continue to live in. MCREST will offer to house the homeless which the Township funds and Turning Point to assist battered and abused women and children.
4. The Township is continually identifying state, local and federal funds. Funds from those sources at this time are minimal.

Managing the Process

1. Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated 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. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.

Program Year 5 Action Plan Managing the Process response:

Clinton Township is receiving \$512,523 of Community Development Block Grant funds that was appropriated and is the lead agency for the CDBG Program. The Township is part of the Macomb County HOME Consortium and it is expected to receive an estimated \$207,621. The county as the lead agency has submitted the Consolidated Plan on behalf of the Consortium and is applying for the HOME funds under their Annual Action Plan.

All public service agencies, Township departments and community groups were notified to request funds for their various groups. All groups were asked for information on the programs. A public hearing was held to discuss each CDBG request.

All agencies are contacted to discuss the relevant projects that are funded. Communication ensues during the year. Discussion ensues on ways to assist each agency through technical assistance from the Township and various avenues of additional funding. All agencies were contacted in February and March of 2013.

Citizen Participation

1. Provide a summary of the citizen participation process.
2. Provide a summary of citizen comments or views on the plan.
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.
4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

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

Program Year 5 Action Plan Citizen Participation response:

Citizens were given an opportunity to comment on the allocation of funds at a public hearing held at the Township board on March 11, 2013. The public hearing notice was published in the newspaper, put on cable television and published a second time as an agenda item in the Township Board Agendas. The meeting is televised live and

replayed twice. On April 8, 2013, the Township Board held a second public hearing meeting and allocated funds.

The Township has a citizen's participation plan that outlines the process. Efforts are made to accommodate minorities, non-English speaking and persons with disabilities, not to exclude anyone.

There were no comments received on the plan. All comments received at the public hearing were taken into account.

Institutional Structure

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

Program Year 5 Action Plan Institutional Structure response:

Actions taken will continue to disseminate information on the CDBG program and attend workshops for further training. Assistance will be given to agencies needing help to establish programs for low/moderate income. Partnerships will continue with non-profits developing low housing in Colchester through Habitat for Humanity as well as the County through the HOME Consortium.

Monitoring

1. 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.

Program Year 5 Action Plan Monitoring response:

The Township takes an active roll in monitoring sub-recipients as well as the public facility improvement projects. The Township will continue its single family rehabilitation program. As situations arise when assisting these homeowners every effort is made to help or direct to agencies which would provide help.

The Township staff monitors all housing rehab projects where CDBG funds are expended. Staff has monitored all sub-recipients last year and will continue to review all programs, initiate site visits and review files.

Lead-based Paint

1. 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.

Program Year 5 Action Plan Lead-based Paint response:

Clinton Township has a low number of units that could likely contain lead-based paint. Fortunately, it has had an extremely low incidence of lead poisoning in young children. Since there are insufficient funds to address all issues, the Township has elected not to undertake an aggressive lead-reduction strategy as part of this program. It is however, committed to implementing the lead based paint regulations in any housing rehabilitation undertaken as part of the CDBG program. This includes testing all homes built before the required period, 1978. This will ensure a healthy environment for any household beneficiary.

HOUSING

Specific Housing Objectives

*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.
2. 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.

Program Year 5 Action Plan Specific Objectives response:

The priority needs in our Consolidated Plan address the foreclosure crisis preservation of existing housing public facility and infrastructure improvement, addressing needs of the homeless and at risk families and provides and expands human services. These needs are addressed in this year's Action Plan by the allocation of CDBG funds and the NSP program.

The priority needs are high to maintain existing single-family owner-occupied housing stock through rehabilitation and other housing support services. This includes upgrading sub-standard units to meet Housing quality Standards and prevent or discourage demolition of housing. A total of 30 homeowner households are estimated to be rehabilitated; 20 with Community Development Block Grant (CDBG) funds and 10 with not-CDBG rehabilitation. Also, the Township is partnering with Habitat for Humanity and has assisted 16 homes this past year and will continue to assist eligible homeowners. Housing needs table is the Consolidated Plan submitted by the Macomb Urban County.

Clinton Township presently coordinates with and supports the MCCSA SHORES Program, the MCCSA CHIP Program and the Macomb County Weatherization Program. References are made to that agency and rehabilitation has been completed in homes which have been weatherized under the Macomb County program. The Township also refers households to the Michigan State Housing Development Authority (MSHDA) for assistance when CDBG rehabilitation is not economically feasible, where the timetable is most advantageous to the homeowner or when additional funds are necessary in excess of the Township maximum \$25,000 loan. The Rehabilitation Board, however, grants exceptions when appropriate; \$260,490 has been allocated to the Residential Rehabilitation Program.

Housing rehabilitation for owner-occupied homes using CDBG funds will be serviced and managed by the Township Department of Planning and Community Development Staff. Township contracts with MCCSA to undertake CHORES. The project directly services over 60 elderly households each year. \$11,000 has been allocated to the CHORE program to assist seniors.

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.
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.

Program Year 5 Action Plan Public Housing Strategy response:

Another priority needed is rental assistance to lower-income throughout the Township. Clinton Township expects to apply for additional Section 8 vouchers if they become available. This will occur though the Clinton Township Housing Commission (CTHC).

The Township continues to work with CTHC, HUD Section 8 Existing Voucher Program and Michigan State Housing Development Authority (MSHDA) to secure additional Section 8 vouchers. The Township has 23 vouchers administered by CTHC and MSHDA has roughly 80 vouchers to Township residents. The Township Community Development staff will assist CTCH in securing additional vouchers. The Public Housing Commission is no longer on the troubled housing list. The Township Planning staff assists in providing technical assistance, such as environmental reviews and any other assistance required.

Barriers to Affordable Housing

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

Program Year 5 Action Plan Barriers to Affordable Housing response:

The Township has policies, procedures and processes in place for land use, tax policies, zoning ordinance and building codes. The Township does not exclude any type of housing, including affordable housing. The Township has assisted living and public housing. The ratio of single-family housing to multiple-family is 70 to 30. The township offers tax breaks to lower income property owners. Fees for permits for building, etc., have been waived if there is a need.

The Township is part of Macomb County's Analysis of Impediments (AI) and has updated its own AI to further fair housing. The Township also works with the County to further fair housing. The Township has an ordinance in place to address impediments to fair housing. The 2011 AI was submitted by the Township in

January 2011. When there is a complaint, the Township policy is to refer the complaint to the Supervisor who receives the complaint and refers the complaint for unlawful discrimination to the Township attorney or the Police Department within 30 days. If the complaint has not been resolved, parties may seek redress through the Fair Housing Center of Detroit or the Michigan Civil Rights Commission.

HOME/ American Dream Down payment Initiative (ADDI)

1. Describe other forms of investment not described in § 92.205(b).
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.
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:
 - 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:
 - 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.

Program Year 5 Action Plan HOME/ADDI response:

N/A

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.
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.
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.
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.
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.

Program Year 5 Action Plan Special Needs response:

The Township of Clinton will continue to support activities that will assist the homeless or those in danger of becoming homeless. The Township funds the Continuum of Care Coordinator with \$2700 and will continue its previous support of the Macomb Homeless Coalition, a consortium of agencies chartered to address the physical and emotional needs of the homeless and near homeless. Continued support will be given to meeting the needs of elderly homeowners in need of chore services through an allocation of \$11,000. Consequently, although Clinton Township may lack resources, it has committed itself to improving conditions for the homeless and other special needs populations. The Township will continue, to the extent possible, to support these or similar initiatives in the future. The Township continues to support the elderly, persons with substance abuse, HIV/Aids and those not homeless by referring persons to the appropriate agency and by providing Home Chores program for seniors. The Township has allocated \$550 for MCREST (Macomb County Rotation Emergency Shelter Team) to fund shelter nights for the homeless. \$2,200 has been allocated to Turning Point and emergency shelter for women and children fleeing violence in the home setting. \$3,300 has also been allocated to CARE House, which coordinates investigation of child abuse and sexual child abuse at one location to provide fewer traumas for the child. \$1100 has been allocated to the Prescription

Resource Network, which helps to obtain prescription medication for low income persons through patient assistance programs of major pharmaceutical companies. W.W. Community Connections (Hope Center) has been allocated \$550 to assist low/moderate income families who need food assistance and general information on assistance that is available.

The Township works with the Macomb Homeless Coalition to end chronic homelessness as well as homelessness prevention. The Township has a representative on the Board of Directors to help agencies apply for grants that assist various agencies through the application process.

Discharge coordination Policy is working with the Court and Macomb Homeless Coalition to develop a policy.

Emergency Shelter Grants (ESG)

(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.

Program Year 5 Action Plan ESG response:

N/A

COMMUNITY DEVELOPMENT

Community Development

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

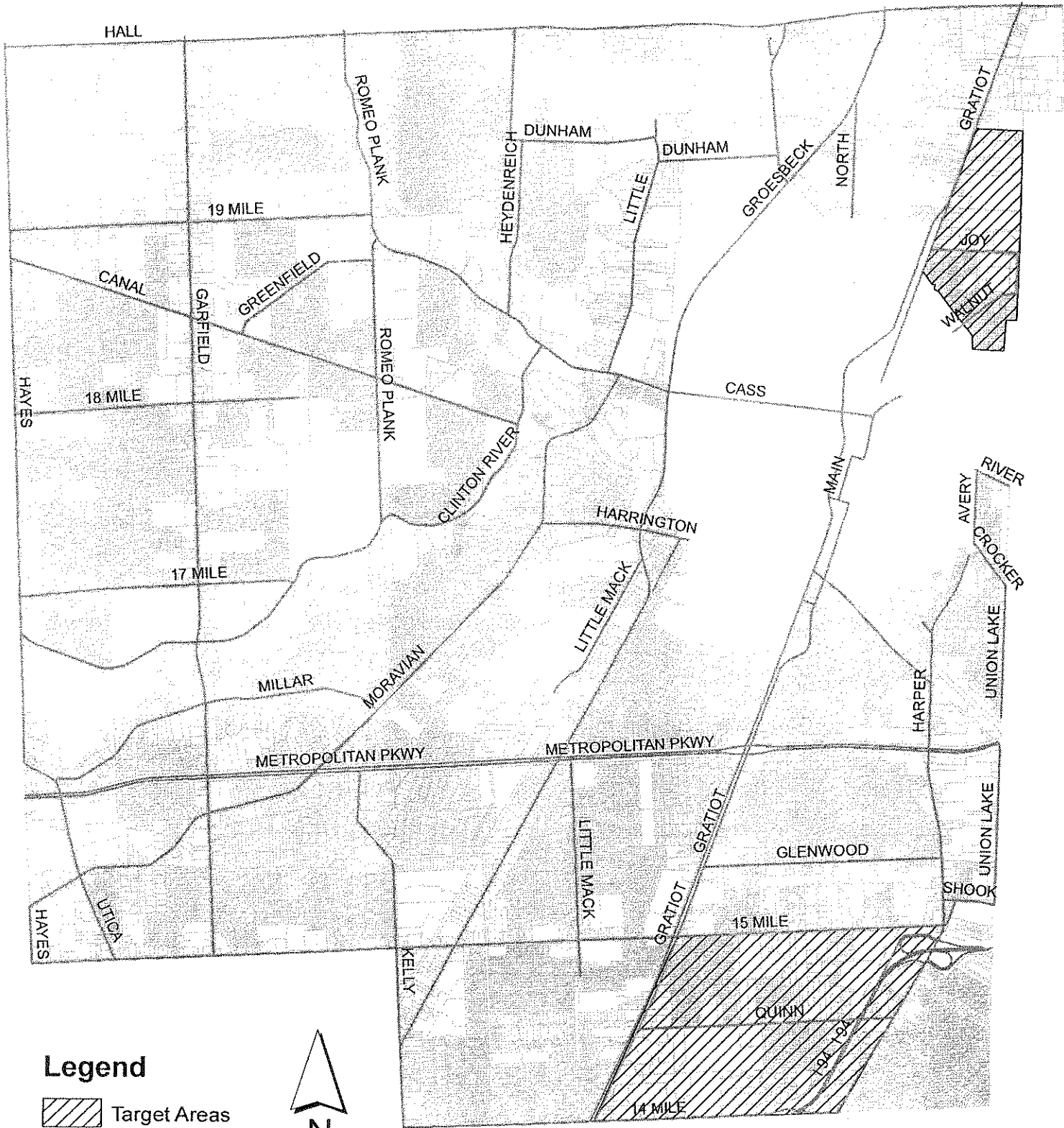
1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.
2. Identify specific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

Program Year 5 Action Plan Community Development response:

The Township has identified two (2) neighborhoods that would most benefit from CDBG and other community development. The Township has also allocated \$57,000 to provide youth programs for low-income areas and households and youth with disabilities in the Quinn Road and Colchester areas. Please see attached map. In

Charter Township of Clinton



addition, \$47,600 have been allocated to Prince Drewry Park on Quinn Road to improve deteriorated basketball courts, the park pavilion and comfort station.

Homeless assistance and other special needs activities is another priority. To the extent possible, Clinton Township has allocated CDBG funds to assist those organizations that aid homeless persons. Such assistance will vary over time, but will hopefully boost the efforts of those organizations created to assist homeless families. The Township will continue to assist Macomb Homeless Coalition, the umbrella organization or non-profit caregivers, in its efforts to develop a complete and effective continuum of care, and to assist other organizations in their particular initiatives. To that end, monies of \$11,000 each have been allocated for public service for chores for seniors; \$2,200 for abused women and the homeless and \$3,300 for abused children.

Neighborhood Improvement Programs are a priority. This includes maintaining the existing community facilities and provides new community facilities where needed in lower-income neighborhoods. It provides recreation facility improvements and youth programs for low-income areas and households and programs for youth with disabilities. The Township has allocated \$14,133 in Fiscal Year 2013 funds and reprogrammed funds of \$45,243 to replace furnaces at the Heritage Estates Senior Housing. Also, \$11,000 were allocated to the Senior Center to install a permanent awning on the west wall of the Center to provide shade over the existing patio for seniors.

Antipoverty Strategy

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

Program Year 5 Action Plan Antipoverty Strategy response:

The Township refers persons of need to appropriate agencies which may help families at poverty level such as www.MacombResources.info. This information provides a wide range of services to assist persons at poverty. The rehab program assists a number of families at poverty who own homes are assisted with rehab.

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.
2. 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.

Program Year 5 Action Plan Specific Objectives response:

The Township of Clinton intends to address non-homeless special needs populations in accordance with Priority Objective #4, Providing and Expanding Essential Human Services to a lesser extent, through Priority Objective #1, Housing, as follows:

- The former priority will be met through the variety of services being undertaken in 2013 by the Urban County and Clinton Township. These include care of and advocacy for abused children (Care House), battered spouses and their dependents (Turning Point), CHORE Services, MCCSA, Senior Programs, Community Connections and Chore Services.
- Housing needs will be met through ADA repairs to disabled homeowners as part of the Township housing rehabilitation program.
- Although not funded through CDBG, the County, through its Department of Community Mental Health (CMH), provides a significant degree of support to people with Severe Mental Illness, the developmentally and physically disabled, people who abuse substances and persons affected by HIV-Aids. Funding comes from the Federal and State governments. SMH, for example, provides supportive services to developmentally disabled residents of the Springhill Housing units, helping them live independently. Its partners, moreover, augment CMH funds with not-governmental resources. This will continue for the foreseeable future.

Housing Opportunities for People with AIDS

*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.
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.

Program Year 5 Action Plan HOPWA response:

Township does not receive funding.

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.

Program Year 5 Specific HOPWA Objectives response:

N/A

Other Narrative

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

None.

W:\i-drive\WORD\GRANTS\Action Plan 2013\Action Plan 5.doc



CPMP Non-State Grantee Certifications

Many elements of this document may be completed electronically, however a signature must be manually applied and the document must be submitted in paper form to the Field Office.

- This certification does not apply.
 This certification is applicable.

NON-STATE GOVERNMENT CERTIFICATIONS

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

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

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, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Drug Free Workplace -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about --
 - a. The dangers of drug abuse in the workplace;
 - b. The grantee's policy of maintaining a drug-free workplace;
 - c. Any available drug counseling, rehabilitation, and employee assistance programs; and
 - d. The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will --
 - a. Abide by the terms of the statement; and
 - b. Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted --
 - a. Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - b. Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

Jurisdiction

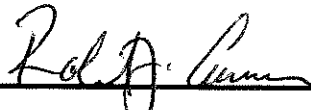
Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

8. 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;
9. 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
10. 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.

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.



Signature/Authorized Official

06/19/2013

Date

Robert J. Cannon

Name

Supervisor

Title

40700 Romeo Plank Road

Address

Clinton Township, Michigan 48038

City/State/Zip

586-286-9325

Telephone Number

- This certification does not apply.
 This certification is applicable.

Specific CDBG Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

Following a Plan -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

11. Maximum Feasible Priority - With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
12. Overall Benefit - The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2____, 2____, 2____, (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
13. Special Assessments - It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

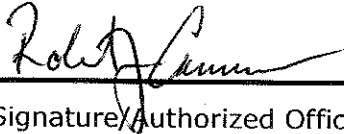
14. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
15. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

Jurisdiction

Compliance With Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of part 35, subparts A, B, J, K and R, of title 24;

Compliance with Laws -- It will comply with applicable laws.



Signature/Authorized Official

06/19/2013

Date

Robert J. Cannon

Name

Supervisor

Title

40700 Romeo Plank Road

Address

Clinton Township, Michigan 48038

City/State/Zip

586-286-9325

Telephone Number

