



# **PUBLIC COMMENT DRAFT**

## **9.5.25**

**The Charter County of Wayne, Michigan  
2024 Annual Consolidated Annual Performance  
Evaluation Report (CAPER)**

**Community Development Block Grant (CDBG)  
HOME Investment Partnerships Program (HOME)  
Emergency Solutions Grant (ESG)**

**Submitted to:**

**U.S. Department of Housing and Urban  
Department Office of Community Planning  
and Development (CPD) Detroit Field Office  
McNamara Federal Building  
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**Submitted by:**

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## **CR-05 - Goals and Outcomes**

### **Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)**

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The 2024 Capex, prepared by the Wayne County Economic Development Department's Community Development Division, provides the status of program goals for activities funded by the Community Development Block Grant Program (CDBG), the HOME Investment Partnership (HOME) and the Emergency Solutions Grant (ESG) for the period July 1, 2024, to June 30, 2025. The CAPER combines planning and reporting requirements for these programs funded by the U.S. Department of Housing and Urban Development (HUD). This is Wayne County's fourth annual performance report for the PY (Program Year) 2021-2025 Consolidated Plan.

In PY 2024, Wayne County received approximately \$5,450,137 in CDBG, \$2,562,853 in HOME, and \$468,155 in ESG funding. During PY 2024, the County expended approximately \$2,634,339 in CDBG, \$1,645,965 in HOME, \$524,352 in ESG and \$1,582 in HOME-ARP funding. No additional funding was received for HOME-ARP. HOME-ARP project development is underway. The County received \$70,382,000 in CDBG-DR funding for disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the "most impacted and distressed" areas resulting from a qualifying major disaster that occurred in 2023 or 2024.

Of the CDBG total expenditures, approximately 90 percent went toward activities benefitting low- and moderate-income people. Projects have included museum renovations, sidewalk improvements, pickleball courts, senior housing improvements, down payment assistance to qualified homebuyers, senior services and senior transportation, code enforcement efforts, demolition, homeless prevention services, domestic violence prevention services and fair housing services.

### **Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)**

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Wayne County has made progress towards meeting stated goals and objectives even if that progress has not yet yielded results in the form of accomplishment data ready to report in IDIS. In several program areas, anticipated progress has slowed as the flow of COVID-era resources has

stopped and program partners such as subrecipients have needed to pivot to maintain or reduce services accordingly. External factors such as consistently rising material costs, labor shortages, and shifts in federal guidance contributed to delays in achieving program goals. Internal factors such as limited capacity and staff turnover, particularly at the leadership level, have contributed as well. However, Wayne County has been diligent in: filling vacancies and initiating recruitment activities; seeking technical assistance, collaborating with partners, and hiring expert consultants; and conducting a wide-ranging review of policies and procedures to overhaul programs as needed and is steadily working its way towards improved performance and outcomes.

**\*\* DATE IS STILL BEING COLLECTED FOR GOAL ACCOMPLISHMENTS\*\***

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Administration and Planning	Administration and Planning	CDBG: \$ / HOME: \$ / ESG: \$	Other	Other	0	0		100	0	0.00%
Affirmatively Further Fair Housing	Fair Housing	CDBG: \$ / HOME: \$0 / ESG: \$0	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	750	202	26.93%			
Affirmatively Further Fair Housing	Fair Housing	CDBG: \$ / HOME: \$0 / ESG: \$0	Other	Other	0	0		75	0	0.00%
Enhance Public Infrastructure and Facilities	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$ / HOME: \$0 / ESG: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	45000	44050	97.89%	35917	0	0.00%

Enhance Public Infrastructure and Facilities	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$ / HOME: \$0 / ESG: \$0	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	870				
Homeless Outreach and Prevention	Homeless	CDBG: \$210793 / HOME: \$0 / ESG: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	0	101				
Homeless Outreach and Prevention	Homeless	CDBG: \$210793 / HOME: \$0 / ESG: \$	Homeless Person Overnight Shelter	Persons Assisted	1600	465	29.06%			
Homeless Outreach and Prevention	Homeless	CDBG: \$210793 / HOME: \$0 / ESG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	24				
Homeless Outreach and Prevention	Homeless	CDBG: \$210793 / HOME: \$0 / ESG: \$	Homelessness Prevention	Persons Assisted	0	242		0	0	
Neighborhood Improvement Activities	Non-Housing Community Development	CDBG: \$ / HOME: \$0 / ESG: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	8000	15199	189.99%	0		8400

Neighborhood Improvement Activities	Non-Housing Community Development	CDBG: \$ / HOME: \$0 / ESG: \$0	Buildings Demolished	Buildings	600	139	23.17%			
Neighborhood Improvement Activities	Non-Housing Community Development	CDBG: \$ / HOME: \$0 / ESG: \$0	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	20000	23421	117.11%	17220	0	0.00%
Neighborhood Improvement Activities	Non-Housing Community Development	CDBG: \$ / HOME: \$0 / ESG: \$0	Other	Other	2	1	50.00%	6038	0	0.00%
Provide Economic Development Opportunities	Non-Housing Community Development	CDBG: \$	Jobs created/retained	Jobs	20	0	0.00%			
Public Service Activities	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$ / HOME: \$0 / ESG: \$0	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	500000	89698	17.94%	38941	11676	29.98%
Upgrade the County's Housing Stock	Affordable Housing	CDBG: \$ / HOME: \$ / ESG: \$0	Rental units rehabilitated	Household Housing Unit	0	0		22	0	0.00%
Upgrade the County's Housing Stock	Affordable Housing	CDBG: \$ / HOME: \$ / ESG: \$0	Homeowner Housing Added	Household Housing Unit	0	3		15	0	0.00%

Upgrade the County's Housing Stock	Affordable Housing	CDBG: \$ / HOME: \$ / ESG: \$0	Homeowner Housing Rehabilitated	Household Housing Unit	225	25	11.11%		
Upgrade the County's Housing Stock	Affordable Housing	CDBG: \$ / HOME: \$ / ESG: \$0	Direct Financial Assistance to Homebuyers	Households Assisted	400	113	28.25%	30	63
Upgrade the County's Housing Stock	Affordable Housing	CDBG: \$ / HOME: \$ / ESG: \$0	Other	Other	1	16	1,600.00%		

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

**Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.**

Wayne County staff continue to develop the Action Plan based on input from our Participating Jurisdictions. They determine the needs of their respective communities and present them during the Request for Proposal (RFP) process. Every request is not funded but each participating jurisdiction is guaranteed public service or code enforcement funds at \$20,000 annually. Public Services and Code Enforcement have continued to be a priority. During the RFP process, the County reviews the proposals and determines which projects better align with its goals and objectives while ensuring fair distribution of projects over time and realizing more impactful projects. County-wide priorities and objectives are communicated to participating jurisdictions through the Annual Action Plan. Progress toward meeting annual County-wide objectives is subject to the actions and capacity of each local municipality to carry out its public service and code enforcement activities and the County partnering with select participating jurisdictions in the execution of the larger more impactful projects.

## CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG	HOME
White	11,474	199
Black or African American	1,150	105
Asian	133	0
American Indian or American Native	47	0
Native Hawaiian or Other Pacific Islander	1	0
<b>Total</b>	<b>12,805</b>	<b>304</b>
Hispanic	983	44
Not Hispanic	11,822	260

Describe the clients assisted (including the racial and/or ethnicity of clients assisted with ESG)

	HESG
American Indian, Alaska Native, or Indigenous	0
Asian or Asian American	0
Black, African American, or African	0
Hispanic/Latina/e/o	0
Middle Eastern or North African	0
Native Hawaiian or Pacific Islander	0
White	0
Multiracial	0
Client doesn't know	0
Client prefers not to answer	0
Data not collected	0
<b>Total</b>	<b>0</b>

Table 2 – Table of assistance to racial and ethnic populations by source of funds

## Narrative

## CR-15 - Resources and Investments 91.520(a)

### Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	5,660,930	2,634,339
HOME	public - federal	2,562,853	1,645,965
ESG	public - federal	468,115	524,352

**Table 3 - Resources Made Available**

### Narrative

In PY 2024, Wayne County received \$5,660,930 in CDBG, \$2,562,853 in HOME and \$468,115 in ESG funding.

During PY 2024, the County expended approximately \$2,634,339 in CDBG, \$1,645,965 in HOME and \$524,356 in ESG funding. No additional HOME-ARP funding was received in PY 2024. Total HOME-ARP funding received was \$10,288,375. Approximately \$1,582 was expended during FY 2024 for administration. Planning is underway for new construction or rehabilitation of multifamily rental housing developments serving low-income households utilizing Home funding. The County is also making available HOME-ARP funding for housing projects that serve Qualifying Populations of: homeless persons/persons at-risk of homelessness; persons fleeing, or attempting to flee, domestic/dating violence, sexual assault, stalking, or human trafficking; other populations where providing supportive services or assistance would prevent homelessness or would serve those with the greatest risk of housing instability; and veterans and families that include a veteran family member that meet one of the preceding criteria.

Additionally, CDBG-DR funding in the amount of \$70,382,000 was allocated to the County in early 2025 based on a major disaster that occurred in Wayne County in 2023 or 2024. The disaster recovery funds allocated to support long-term recovery and mitigation in disaster-impacted communities. The funds are intended for communities and neighborhoods that have the greatest unmet needs or that face the greatest challenges to recover. Planning is underway for the use of these funds.

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Urban County Participating Jurisdictions	90	90	Local units of government

**Table 4 – Identify the geographic distribution and location of investments**



## **Narrative**

Wayne County distributes \$20,000 in CDBG funds to each Participating Jurisdiction for public service or code enforcement activities annually. A portion of the funding is used to affirmatively further fair housing, assist victims of domestic violence/stalking/assault and Wayne County projects. The bulk of CDBG funds goes to competitively chosen high-impact activities as determined by the County based on proposals submitted by Participating Jurisdictions. The Urban County of Wayne consists of thirty-four (34) participating cities and townships within Wayne County, excluding the Cities of Dearborn, Dearborn Heights, Detroit, Lincoln Park, Livonia, Taylor and Westland and the Townships of Canton and Redford. However, the Cities of Dearborn, Lincoln Park, Livonia and Taylor do participate along with the 34 PJs in the County's HOME Consortium for the use of HOME funds.

The 34 Urban County Participating Jurisdictions are the Cities of Allen Park, Belleville, Ecorse, Flat Rock, Garden City, Gibraltar, Grosse Pointe, Grosse Pointe Farms, Grosse Pointe Park, Grosse Pointe Shores, Grosse Pointe Woods, Hamtramck, Harper Woods, Highland Park, Inkster, Melvindale, Northville, Plymouth, River Rouge, Riverview, Rockwood, Romulus, Southgate, Trenton, Wayne, Woodhaven and Wyandotte; and the Townships of Brownstown, Grosse Ile, Huron, Northville, Plymouth, Sumpter and Van Buren.

## Leveraging

**Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.**

HOME Match funds were adjusted back to 2021 levels. The funds were reported incorrectly in previous reports. Staff are reviewing policies and procedures to determine how match funds are reported for future reports. In particular, as the County contributes HOME funds into eligible housing development projects, it is mandating non-federal match be included in the capital stack for projects. These matching resources will be more precisely reported in the future pending the above referenced review process.

<b>Fiscal Year Summary – HOME Match</b>	
1. Excess match from prior Federal fiscal year	1,121,748
2. Match contributed during current Federal fiscal year	0
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	1,121,748
4. Match liability for current Federal fiscal year	368,081
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	753,667

**Table 5 – Fiscal Year Summary - HOME Match Report**

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
None	0	0	0	0	0	0	0	0

Table 6 – Match Contribution for the Federal Fiscal Year

### HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
275,694	10,249	0	0	285,943

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Dollar Amount	1,500,000	0	0	1,500,000	0	0
Number	1	0	0	1	0	0
Sub-Contracts						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
	Total	Women Business Enterprises	Male			
Contracts						
Dollar Amount	0	0	0			
Number	0	0	0			
Sub-Contracts						
Number	0	0	0			
Dollar Amount	0	0	0			

**Table 8 - Minority Business and Women Business Enterprises**

<b>Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted</b>						
	<b>Total</b>	<b>Minority Property Owners</b>				<b>White Non-Hispanic</b>
		<b>Alaskan Native or American Indian</b>	<b>Asian or Pacific Islander</b>	<b>Black Non-Hispanic</b>	<b>Hispanic</b>	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

**Table 9 – Minority Owners of Rental Property**

<b>Relocation and Real Property Acquisition</b> – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired		0		0		
Businesses Displaced		0		0		
Nonprofit Organizations Displaced		0		0		
Households Temporarily Relocated, not Displaced		0		0		
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

**Table 10 – Relocation and Real Property Acquisition**

## CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	5	0
Number of Non-Homeless households to be provided affordable housing units	115	73
Number of Special-Needs households to be provided affordable housing units	5	0
<b>Total</b>	<b>125</b>	<b>73</b>

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	50	0
Number of households supported through The Production of New Units	10	0
Number of households supported through Rehab of Existing Units	25	10
Number of households supported through Acquisition of Existing Units	40	63
<b>Total</b>	<b>125</b>	<b>73</b>

Table 12 – Number of Households Supported

**Discuss the difference between goals and outcomes and problems encountered in meeting these goals.**

The rental assistance program ended with Wayne Metro Community Action Agency. Additional programming did not occur during this reporting period. Two HOME projects were in development during the last report: 1) New Housing construction in Harper Woods and 2) Renovation of a senior living facility to create larger, ADA compliant housing units in Westland. The new housing construction is no longer being considered for funding by the County. The senior living facility rehabilitation project is undergoing underwriting.

The housing rehabilitation program is being revamped to bring efficiencies to the program to allow more Wayne County residents to receive assistance. Additionally, a marketing campaign is underway to solicit more rehabilitation contractors and to target minority businesses.

**Discuss how these outcomes will impact future annual action plans.**

**Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.**

<b>Number of Households Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>
Extremely Low-income	7	0
Low-income	3	0
Moderate-income	0	63
<b>Total</b>	<b>10</b>	<b>63</b>

**Table 13 – Number of Households Served**

### **Narrative Information**

Ten homeowners received housing upgrades as a result of the CDBG Housing Rehabilitation program.

Sixty-three families benefitted from HOME Program Down Payment Assistance.

## **CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)**

**Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:**

### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

Wayne County continues to work closely with the Out-Wayne County Continuum of Care (CoC) to provide critical support for the homeless population and persons at risk of being homeless. This support includes housing, case management, education and life skills.

Wayne County continues to support a nonprofit, Samaritas, to provide operations, case management and other services to the Wayne County Family Center, located in Westland. Plans for the development of a new facility are stalled awaiting State funding. The Emergency Overnight Shelter in River Rouge continues to provide support and supportive services for individuals in Wayne County. It also serves as a satellite service center for a local non-profit that leads the Continuum of Care for Out-Wayne County.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

The County continues to seek opportunities to partner with other entities to develop ways to address the need for additional emergency shelter space and transitional housing. As mentioned in the previous report, approximately \$1.9 million in COVID funding was used to support the rehabilitation of a former youth center to an Overnight Homeless Shelter and support services facility in River Rouge. Approximately \$1.4 million in additional funds were leveraged from the Michigan State Housing Development Authority (MSHDA) and Wayne Metropolitan Community Action Agency to complete the project. The shelter provides year-round emergency overnight shelter services in the evenings and provides supportive services.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

Wayne County and its Participating Jurisdictions continue to undertake a multitude of public service activities that benefit low- to moderate-income persons. Activities include senior transportation, senior chore services, mental health counseling, senior activities and code enforcement. The County also worked with service providers to address the problem of homelessness for those who are at risk to



include working collaboratively with Samaritas and Wayne Metropolitan Community Action Agency.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

In order to combat homelessness in Wayne County, the Community Development Program is still committed to working closely with service providers by supporting programs that help create economic opportunities and supply homelessness prevention services.

For several years, Wayne County has allocated CDBG funds and ESG funds to the Wayne County Family Center, the only family shelter in Wayne County. Referrals were made to the Out-Wayne County CoC, First Step Domestic Violence Center, the Salvation Army, United Way 211, Wayne Metropolitan Community Action Agency and ChristNet.

## **CR-30 - Public Housing 91.220(h); 91.320(j)**

### **Actions taken to address the needs of public housing**

Wayne County continues to develop its strategy to increase the amount of affordable housing opportunities throughout the County. Part of the strategy includes establishing a Public Housing Authority. Board members are in place and planning the operation of the Authority. The Michigan State Housing Development Authority currently gets approximately 7800 Wayne County vouchers for communities that do not have a housing authority. The goal is to obtain these vouchers and additional federal support (funding) to provide quality affordable and workforce housing throughout all of Wayne County.

### **Actions taken to encourage public housing residents to become more involved in management and participate in homeownership**

No actions have been taken because the Urban County of Wayne does not control any public housing. Wayne County has thus not taken any actions to encourage public housing residents to become more involved in management and participate in homeownership.

### **Actions taken to provide assistance to troubled PHAs**

Wayne County continues to provide assistance as needed and/or requested. Assistance was recently provided to the Highland Park Housing Authority to perform environmental tasks associated with the demolition of blighted housing structures.

### **CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)**

**Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)**

Wayne County Community Development completed an Analysis of Impediments To Fair Housing (AI) in early 2021 (as required by HUD) and the results of that effort informed the creation of the County's 2021-2025 Consolidated Plan. The feedback received was instrumental in developing the plan and ensuring we address the needs of the County as a whole. We are preparing for the next survey to include in the development of the 2026-2030 Consolidated Plan. The new Analysis will also be used as a template to ensure we address the needs identified.

Wayne County works with landlords, municipalities, service providers, nonprofit housing agencies and developers to emphasize the importance of affordable housing units throughout the County, and to make sure that renters and homeowners are aware of their fair housing rights. Wayne County continues to partner with and support the Fair Housing Center of Metropolitan Detroit to assist us in our efforts.

### **Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)**

Wayne County continues to pursue activities that create a suitable living environment and promote access to public services for persons known and presumed to be low- to moderate-income. The County funded activities that serve children, seniors and elderly residents, veterans, battered partners, the homeless, persons at risk of being homeless and persons with special needs.

### **Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)**

Although Wayne County has successfully managed lead-based paint reduction grant funds in the past, there are not currently any programs dedicated to those activities. Efforts were made to resume lead reduction activities through a draft proposal to the Lead Hazard Reduction Grant Program but ultimately concerns over existing staff capacity and a loss in institutional knowledge (the prior activities were pre-COVID19) meant that a feasible proposal could not be submitted in time. Currently, some lead-based paint hazard reduction activities are completed through home repair efforts under certain circumstances, but it is not a core component of County programming. Resuming this program offering to County residents is an internal goal that has been set for future funding years.

### **Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)**

Wayne County continues to work with our Participating Jurisdictions, service providers and agencies to provide down payment assistance, home rehabilitation programs, transportation and other public

services for at-risk populations.

**Actions taken to develop institutional structure. 91.220(k); 91.320(j)**

Wayne County continued to work within an array of partnerships with for-profit and nonprofit agencies and across County departments. The County continues to be an active participant in the Out-Wayne County Continuum of Care (CoC), which serves as the institutional structure for housing and other services.

Implementing Wayne County Community Development's competitive method of choosing CDBG activities required new relationships with Purchasing and other agencies within the County, which has helped to ensure consistent project administration. We continue to work closely with subrecipients to ensure compliance with Davis Bacon, Section 3, procurement, fair housing and other required regulations.

**Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)**

Wayne County continues to work with our Participating Jurisdictions, service providers and agencies to provide down payment assistance, home rehabilitation programs, transportation and other public services for at-risk populations.

**Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)**

Wayne County continues to fund the Fair Housing Center of Metropolitan Detroit and supports its efforts in educating realtors and enforcing fair housing laws throughout the County. Wayne County's 2021 Analysis of Impediments to Fair Housing identified impediments and areas of improvement to be ameliorated in the 2021-2025 Comprehensive Plan. Preparation of a new Analysis is underway to be used in developing the 2026 - 2030 Comprehensive Plan. The Analysis was discussed with Participating Jurisdictions to bring to light any municipal policies that may impact fair housing.

Wayne County also hosted another year of its annual "Pathways to Prosperity" event for all Wayne County communities. That event highlighted County-led efforts on transportation, housing, sustainability, and economic development. In particular, a panel on Housing brought together experienced professionals who lead affordable, mixed income, senior, and highly subsidized housing projects. Discussion covered the benefits of investing in and welcoming affordable housing into communities, using local success stories as case studies. The conversation also included an appeal for

jurisdictions to review subsidized and naturally occurring affordable housing that is already serving existing residents in their communities and to consider renovation and reinvestment projects. Finally, ways to view housing developments as catalyzing opportunities to anchor economic investment – and to make sure that housing provided is of high quality and connects residents to vibrant amenities – also garnered audience engagement.

## **CR-40 - Monitoring 91.220 and 91.230**

**Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

The process remains consistent for Wayne County. We continue to enter into subrecipient agreements that contractually obligate grantees to comply with all applicable laws and regulations. In order to ensure that Wayne County and its subrecipients are executing activities in accordance with those federal requirements, Wayne County continues its monitoring policy for CDBG, HOME and ESG funds. The policy includes onsite monitoring, desk monitoring and training.

The Onsite Monitoring Plan consists of 1) Risk Analysis; 2) Notice to the Subrecipients; 3) Written Conclusions and Corrective Actions; and 4) Monitoring Closeout.

The first phase of the Plan is a Risk Analysis, performed annually in accordance with HUD Community Planning and Development (CPD) guidance. The Annual CPD Notice describes five factors for determining risk, which are financial, physical, management, satisfaction and services.

The Risk Analysis identifies which subrecipients will be monitored for the Program Year. It also determines the areas/subjects and activities to be monitored. Upon completion of the Risk Analysis and after both the areas/subjects to be monitored and the type of monitoring have been determined, the selection is made, and notifications are sent to the subrecipients.

## **Citizen Participation Plan 91.105(d); 91.115(d)**

**Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.**

One public hearing was held virtually via Zoom on September 10, 2024, at 11 a.m.

The hearing was held via Zoom in order to obtain maximum participation. The climate has changed since the pandemic and the County continues to be responsive to that change and foster maximum participation.

As always, public hearing information was posted in a paper of general circulation as required. Notification was published in the *Detroit Free Press/Detroit News* on September 5, 2025. The

information was also emailed to participating jurisdictions in the event they missed the posting in the newspaper.

A draft of the 2024 CAPER was available for public review online at the County website and was also made available at the Wayne County Community Development Program office from September 11, 2025, through September 25, 2025.

**CR-45 - CDBG 91.520(c)**

**Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.**

No changes have been made in the jurisdiction's program objectives.

**Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?**

No

**[BEDI grantees] Describe accomplishments and program outcomes during the last year.**



## **CR-50 - HOME 24 CFR 91.520(d)**

**Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations**

Please list those projects that should have been inspected on-site this program year based upon the schedule in 24 CFR §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

A preliminary on-site inspection was conducted for Freedom Village, located at 2412/2414; 2418/2424; and 2426/2430 Faber in Hamtramck. The facility has six units set up as duplexes. During the visit, no issues were detected with the exterior or common areas. The unit that was inspected was empty and in good repair. A follow up is planned to complete the inspection.

**Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 24 CFR 91.520(e) and 24 CFR 92.351(a)**

Wayne County has an Affirmative Marketing Plan that is applied to all rental and homebuyer projects containing five (5) or more HOME-assisted dwelling units. All HOME-assisted units created by the Wayne County HOME Program are required to be marketed in compliance with the Plan, regardless of the developer. The Affirmative Marketing Policy is included in applicable written agreements between Wayne County and the entity carrying out the project. The policy requires advertising that includes the equal housing opportunity logo and special outreach measures to inform and solicit applications from persons in the housing market area who are not likely to apply for housing. The project owner or manager must maintain records tracking these efforts and the outcomes.

As part of the monitoring review process, Wayne County requires that those HOME projects containing five (5) or more HOME-assisted units submit a current copy of their Affirmative Marketing Plan annually.

**Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics**

Wayne County has approximately \$17,647 in HOME Program Income. HOME activities have focused primarily on Down Payment Assistance. One project is underway to renovate a building for senior apartments. This project will not utilize program income.

**Describe other actions taken to foster and maintain affordable housing. 24 CFR 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 24 CFR 91.320(j)**

The reactivation of a Wayne County Public Housing Authority has been approved by the Wayne County

Commission and planning efforts are underway as part of the County's strategy to increase the amount of affordable housing opportunities throughout the County. Board members have been selected, and they are currently in the planning and development phase of the Authority.

Additionally, although posted after the 2024 program year end, Wayne County has issued an RFP for affordable housing development through the HOME program and will be making awards in 2025.

## CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

<b>Total Labor Hours</b>	<b>CDBG</b>	<b>HOME</b>	<b>ESG</b>	<b>HOPWA</b>	<b>HTF</b>
Total Number of Activities	0	0	0	0	0
Total Labor Hours	0	0	0		
Total Section 3 Worker Hours	0	0	0		
Total Targeted Section 3 Worker Hours	0	0	0		

**Table 14 – Total Labor Hours**

<b>Qualitative Efforts - Number of Activities by Program</b>	<b>CDBG</b>	<b>HOME</b>	<b>ESG</b>	<b>HOPWA</b>	<b>HTF</b>
Outreach efforts to generate job applicants who are Public Housing Targeted Workers					
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.					
Direct, on-the job training (including apprenticeships).					
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.					
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).					
Outreach efforts to identify and secure bids from Section 3 business concerns.					
Technical assistance to help Section 3 business concerns understand and bid on contracts.					
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.					
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.					
Held one or more job fairs.					
Provided or connected residents with supportive services that can provide direct services or referrals.					
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.					
Assisted residents with finding child care.					
Assisted residents to apply for, or attend community college or a four year educational institution.					
Assisted residents to apply for, or attend vocational/technical training.					
Assisted residents to obtain financial literacy training and/or coaching.					
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.					
Provided or connected residents with training on computer use or online technologies.					
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.					
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.					

Other					
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**Table 15 – Qualitative Efforts - Number of Activities by Program**

## Narrative

Note: Section 3 guidelines go into effect when federal funding assistance exceeds \$200,000 to a HUD-funded housing rehabilitation, housing construction, or other public construction project, and when training or employment opportunities arise due to that project. In Wayne County's 2024 program year, none of the contracts exceeding \$200,000 were identified as having new training or employment needs. This means that the contractor firms that won the work through competitive procurements were able to complete those projects with existing staff resources.

However, Wayne County, through both federal and non-federal programs as appropriate given federal and local regulations, is making a concerted effort to connect business opportunities to more small, local, and minority-owned companies with the hope to support local economies and help grow small businesses. These opportunities may by default be less than \$200,000 as small companies often have lower capacity to handle larger contracts. There may increasingly be opportunities through those programs to promote Section 3 interests, although they will not show up directly on the CAPER.