



COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)

PROGRAM YEAR 2022-2023 (CD048) CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT (CAPER)

Development Services Department

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WATERFORD TOWNSHIP
PY 2022 CONSOLIDATED ANNUAL PERFORMANCE EVALUATION REPORT

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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.

Waterford Township's Program Year 2022-2026, 5-Year Consolidated Plan (Con Plan) was prepared to guide the development of a viable urban community by providing decent housing, a suitable living environment and expanded economic opportunities principally for LMI persons. To assist with the development of the Con Plan, an approved citizen participation plan (2020) was used to gather public comments through public meetings and the consultation process provided additional input. Information gathered from the public and data provided by HUD was used to identify goals and objectives of the community as well as define activities in order to achieve them annually.

For the 2022-2023 CDBG Program Year, the Waterford Township Board allocated funding to align with its adopted program, goals, visions, and strategies identified in the Con Plan. Unfortunately, insufficient federal, state and local financial resources were available to address all of the community's needs. However, by concentrating the annual CDBG allocation to improve residential living conditions, revitalize neighborhoods, administer fair housing efforts, and oversee planning activities, Waterford Township believes the greatest possible return on investment was realized.

During PY2022, additional funds were spent with support of the CARES Act funding. Funding was spent as follows:

- A total of \$27,416.12 was spent on Program Administration.
- A total of \$20,846 was spent supporting the Residential Rental Subsistence programs during PY2022 supporting a total of (6) homes
- A total of \$22,493 was spent supporting the Small Business Grant Assistance programs supporting (3) businesses.

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.

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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 / Planning		CDBG: \$73,745.67	Other	Other	5	1	20%	1	1	100%
Clearance and Removal of Unsafe Structures	Non-Housing Community Development	CDBG: \$0	Buildings Demolished	Buildings	1	0	0%	0	0	N/A
Code Enforcement	Affordable Housing	CDBG: \$210,434.21	Housing Code Enforcement/ Foreclosed Property Care	Household Housing Unit	2000	591	29.55%		400	147%
Fair Housing		CDBG: \$4,000	Other	Other	5	1	20%	1	1	100%
Housing Rehabilitation	Affordable Housing	CDBG: \$133,750.27	Homeowner Housing Rehabilitated	Household Housing Unit	60	6	10%	12	6	50%
Public Facilities and Infrastructure Improvements	Non-Housing Community Development	CDBG: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	50	0	0%	50	0	NA
Public Services	Homeless Non-Homeless Special Needs		Public Facility or Infrastructure Activities other than Low/Mod Income Housing Benefit	Persons Assisted	0	0				
Public Services	Homeless Non-Homeless Special Needs	CDBG: \$54,913.00	Public service activities other than Low/Mod Income Housing Benefit	Persons Assisted	200	759	379.50%	50	759	1518%

Table 1 – PY2022 Amended Accomplishments Table – 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.

The activities approved within the Annual Action Plan by the Township Board are intended to meet the CDBG program National Objectives and Goals of the Consolidated Plan. In general, the Township will consider activities designed to improve the physical condition of the neighborhood to benefit all residents. All activities will benefit low- and moderate- income individuals and families.

Five high level priority needs as defined in the Consolidated Plan were addressed during this reporting cycle. Specifically, Housing; Code Enforcement; Fair Housing; and Administration priorities. Public Facilities and Infrastructure, though identified as a priority need, was unable to be addressed during the past year. In addition, (2) low-priority needs, Public Services (Senior/Disabled curb-to-curb transit service), were addressed this last program year. The Housing Rehabilitation, Code Enforcement, Fair Housing, and administration activities were mainly supported by the Township's 2022-2023 annual allocation. While the Public Service and Public Facilities and Infrastructure Improvement activities were possible through the Township Board's re-allocation of previous program year's residual funds. As a result, Waterford Township was able to help maintain, preserve, and/or develop quality of affordable housing for low income households; ensure decent, safe and sanitary living conditions, as well as blight ordinance enforcement; reduce housing discrimination, promote a diverse inclusive community and affirmatively further fair housing and equal opportunity; and provide for the overall program management, planning, coordination, monitoring, reporting and evaluation necessary for the 2022-2023 CDBG program.

Program Year						
2022						
PY2022						
Grant Number	Allocated	Prior Spending	PI Used	Funds at Start	Funds Drawn	Funds Remaining
B20MC260030	\$ 364,702	\$ 316,345.67	\$ 89,930.00	\$ 48,356.33	\$ 36,673.33	\$ 11,683.00
B20MW260030	\$ 535,507	\$ 389,232.77	\$ -	\$ 146,274.23	\$ 78,002.96	\$ 68,271.27
B21MC260030	\$ 380,937	\$ 240,738.98	\$ 115,403.25	\$ 140,198.02	\$ 131,771.19	\$ 8,426.83
B22MC260030	\$ 366,089	\$ -	\$ -	\$ 366,089.00	\$ 170,539.03	\$ 195,549.97
Grand Total				\$ 700,917.58	\$ 416,986.51	\$ 283,931.07

Figure 1 - PY2022 Program Funding

Activities by Program Year		2022
Activities		Sum of Drawn Amount
CD048		\$ 476,843.15
Code Enforcement		\$ 210,434.21
FY 2022-CD048 - Code Enforcement		\$ 210,434.21
Emergency Housing Rehab		\$ 133,750.27
FY 2022-CD048 - Housing Rehabilitation		\$ 133,750.27
Program Administration		\$ 77,745.67
FY 2022-CD048 - Program Administration		\$ 77,745.67
Public Services - WOTA		\$ 54,913.00
FY 2022-CD048 - Public Service - Seniors/Disabled Persons Curb-to-Curb Transit Service		\$ 54,913.00
CDCV1		\$ 78,002.96
Program Administration		\$ 31,965.97
CDBG-CV Program Administration		\$ 31,965.97
Rental Subsistence Payment		\$ 20,846.00
CDBG-CV Rental Subsistence Payment Program - RSP-45		\$ 3,252.00
CDBG-CV Rental Subsistence Payment Program - RSP-46		\$ 2,429.00
CDBG-CV Rental Subsistence Payment Program - RSP-47		\$ 4,419.00
CDBG-CV Rental Subsistence Payment Program - RSP-48		\$ 2,733.00
CDBG-CV Rental Subsistence Payment Program - RSP-49		\$ 4,113.00
CDBG-CV Rental Subsistence Payment Program - RSP-50		\$ 3,900.00
Small Business		\$ 22,493.00
CDBG-CV3 Small Business Assistance Grant Program - SBG-16		\$ 1,493.00
CDBG-CV3 Small Business Assistance Grant Program - SBG-18		\$ 1,000.00
CDBG-CV3 Small Business Assistance Grant Program - SBG-26		\$ 10,000.00
CDBG-CV3 Small Business Assistance Grant Program - SBG-27		\$ 10,000.00
Mortgage Subsistence Payment		\$ 2,697.99
CDBG-CV Mortgage Subsistence Payment - MSP-03		\$ 2,697.99
Grand Total		\$ 554,846.11

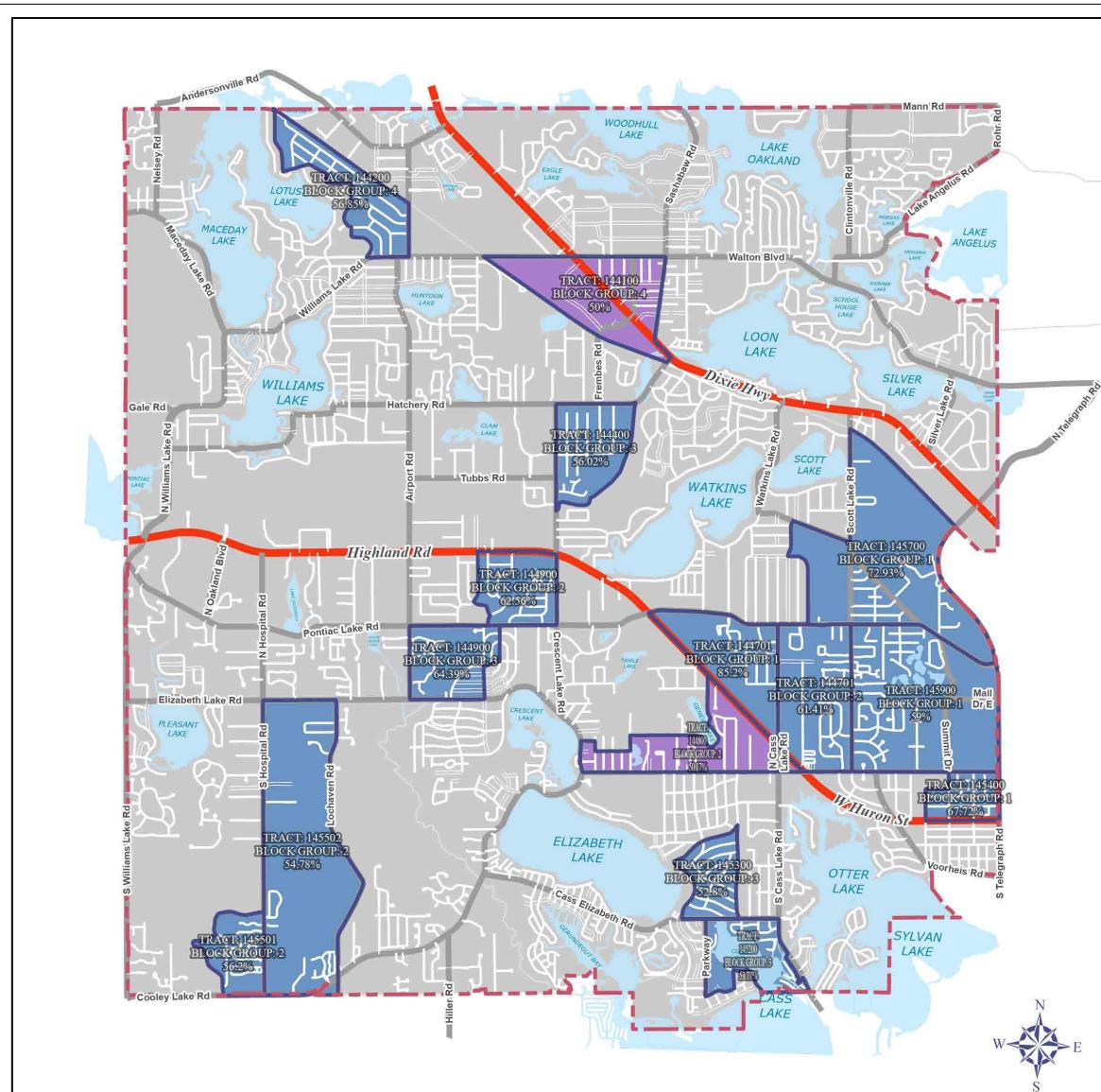
Figure 2 - PY2022 Activities by Program Year

	Rider and Trip Counts			
	WOTA Total		Waterford Only	
	Riders	Trips	Riders	Trips
2022-Q3	384	8,110	170	3,532
2022-Q4	403	8,310	179	3,703
2023-Q1	454	8,996	207	4,014
2023-Q2	501	11,348	216	4,806
TOTAL	1,742	36,764	772	16,055
AVERAGE	436	9,191	193	4,014
Rides Per passenger	21.1		20.8	

NOTE: 2022 Q2 & Q3 Rider counts were not available are estimates calculated based on the average proportion of trips to riders.

	Proportion Distribution of All Riders					
	2022-Q3	2022-Q4	2023-Q1	2023-Q2	WOTA Total	Waterford Total (Calculated)
Regular	274	314	345	504	1,437	628
Elderly	2,386	2,253	3,277	4,359	12,275	5,361
Disabilities	1,102	1,481	1,906	2,714	7,203	3,146
Elderly & Disabilities	2,652	2,825	3,467	5,579	14,523	6,342
WOTA Total	6,414	6,873	8,995	13,156	35,438	15,476
Waterford Total (Calculated)	2,801	3,001	3,928	5,745	15,476	6,758

Figure 3 - PY2022 Senior and Disabled Transportation Program



Eligible CDBG Block Groups

Census data based on 2015 ACS

Municipal Boundary

Eligible 2010 Block Groups

Low / Mod Income Population

Greater or equal to 51%

Greater or equal to 50%

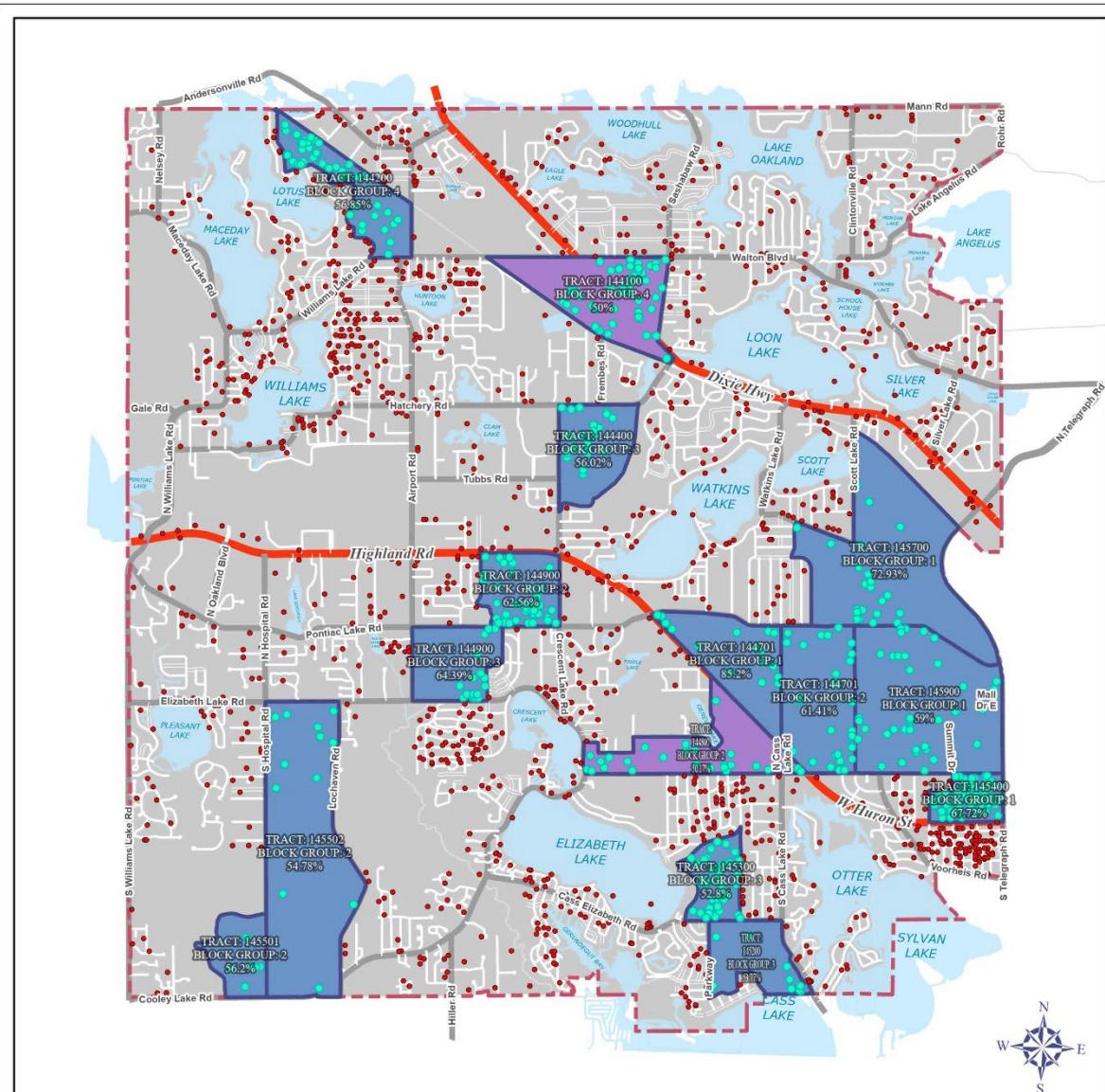
Less than 50%



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Figure 4 - Eligible CDBG Block Groups



Code Enforcement Violations by Program Year

Eligible 2010 Block Groups

Census data based on 2015 ACS

Low / Mod Income Population

Greater or equal to 51%

Greater or equal to

Less than 50%

2010 Black Group

2010 Block Group E

- Municipal Boundary
- PY 2022 Violations In CDBG Areas (591)
- PY 2022 Violations Outside of CDBG Areas (1,567)

WATERFORD Development Services Department



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Figure 5 - Code Enforcement Actions in Eligible CDBG Block Groups

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
White	791
Black or African American	8
Asian	0
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
Total	799
Hispanic	0
Not Hispanic	799

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

Narrative

The total number of persons assisted directly in PY2022 is (799). This was accomplished through several activities:

Emergency Housing Rehabilitation:

- Assisted (6) households of white ethnicity for a total of (9) individuals:
 - Assisted (1) extremely low-income household
 - Assisted (3) low-income
 - Assisted (2) moderate-income families

Rental Assistance:

- Assisted (6) households for a total of (8) black and (14) white individuals
 - Assisted (1) black and (2) white very low-income families
 - Assisted (1) black and (2) white low-income families

Mortgage Assistance:

- Assisted (1) moderate-income household with (1) white individual.

Small Business Assistance:

- Assisted (5) businesses for an additional 8 white employees.

Senior / Disabled Transit

- An additional (759) persons were estimated to have been assisted by the senior transit program over the full program year. However, since other racial and economic demographic data had not been collected, they were presumed white.
- It was not identified how many were repeat users

CR-15 - RESOURCES AND INVESTMENTS 91.520(A)

Identify the resources made available

Source of Funds	Resources Made Available	Amount Expended During Program Year
CDBG	\$838,281.17	\$550,296.26
HOME	-	-
HOPWA	-	-
Other	-	-

Table 3 - Resources Made Available

Narrative

CDBG Program Year 2022-2023 was used to consolidate and utilize previously unspent funds. From prior years 2020-2021 a total of \$168,444.52 was available for use in addition to the current year entitlement allocation of \$366,089 for a total of \$554,643.35 in usable funds. In addition, the township received \$137,859.60 in Program Income from payoffs of Deferred Payment Loans provided under the Township's Urgent Needs Housing Rehabilitation program during this reporting period. A total of \$476,843.15 was expended during the program year. This consisted of \$137,859.6 in PI funds, \$170,539.03 from the current year allocation, and \$338,983.55 from previous years' residual funds. PY2022 ended with a residual of \$215,659.80 in unspent funds of which \$20,659.80 is from previous years.

In addition to the entitlement grant, the Township began the program year with \$145,778.22 in CARES Act funding and utilized \$73,453.11. for activities. With this, 87% of all CARES Act funds allocated have been utilized.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description

Table 4 – Identify the geographic distribution and location of investments

Narrative

Most activities during this reporting period were provided Township-wide and included the Emergency Housing Rehab program, the Mortgage and Rental Assistance programs, the Senior and Disabled Transit program, and the Small Business Assistance program.

The Code Enforcement program covered the Township overall However, efforts supported by CDBG funds were concentrated in low- to moderate-income areas (census tracks & block groups) within the Township.

Specifically, the reported 591 code enforcement inspections occurred in the following CDBG Target Areas: Census Tract 1441, Block Group 4 - (68); Census Tract 1442, Block Group 4 - (61); Census Tract 1444, Block Group 3 - (33); Census Tract 1447.01, Block Group 1 - (21); Census Tract 1447.01, Block Group 2 - (43); Census Tract 1448, Block Group 2 - (33); Census Tract 1449, Block Group 2 - (47); Census Tract 1449, Block Group 3 - (26); Census Tract 1452, Block Group 3 - (13); Census Tract 1453, Block Group 3 - (51); Census Tract 1454, Block Group 1 - (91); Census Tract 1455.01, Block Group 2 - (9); Census Tract 1455.02, Block Group 2 - (15); Census Tract 1457, Block

Group 1 - (31); Census Tract 1459, Block Group 1 - (49)

TOTAL: 591

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.

All CDBG 2022-2023 CDBG program year activities were implemented with CDBG and CDBG-CV funds. Leveraged funds were not required; nor provided.

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	0	0
Number of Non-Homeless households to be provided affordable housing units	0	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	0	0

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	3	6
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	12	6
Number of households supported through Acquisition of Existing Units	0	0
Total	15	12

Table 6 – Number of Households Supported

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

A total of (6) homes received emergency repairs during PY 2022. However, there were (4) additional applications processed. Of these, (1) did not receive any contractor bid response, (1) withdrew the request, (1) did not meet program requirements, and (1) was received late and is being processed in PY2023.

Discuss how these outcomes will impact future annual action plans.

This Program Year was an anomaly and did not match past trends. The Township will more aggressively promote the Emergency Housing Rehab program to both potential applicants and to incorporate more contractors.

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.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	9	0
Low-income	7	0
Moderate-income	20	0
Total	36	0

Table 7 – Number of Households Served

Narrative Information

This data includes the Emergency Housing Rehab, Small Business Assistance , Rental Assistance , and Mortgage Assistance programs. The (423) riders on the Senior / Disabled Transit program were not demographically identified but were a presumed benefit group.

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

Waterford Township recognizes homelessness as a social issue that is not easily contained within municipal boundaries. However, after allocating CDBG funds to other priority needs there were no funds left to address this concern. Therefore, the Waterford Township Board decided that the most effective way to combat homelessness is to support Oakland County's efforts to fight the problems. Responsibility for coordinating the overall Continuum of Care (CoC) and organizing the County's response to HUD's annual CoC application resides with the Alliance for Housing of Oakland County, formerly the Oakland County Taskforce on Homelessness and Affordable Housing.

The Alliance is a 501(c)(3), non-profit organization that works to end homelessness and increase affordable housing opportunities. The Alliance is comprised of approximately 100 organizations including emergency shelters, warming centers, providers of health services including mental health services, providers of services to people with developmental disabilities, for-profit and nonprofit developers of affordable housing, administrators of supportive housing programs, municipalities, governmental agencies, and faith-based service providers.

The Township maintains a strong and close collaborative working relationship with the County and these organizations and will continue to do so in signing Certifications of Consistency with the Consolidated Plan for those organizations working through the County to address housing for special needs populations. Further, information regarding upcoming events and/or services provided through other agencies that participate in the CoC are posted at Town Hall when made available.

Addressing the emergency shelter and transitional housing needs of homeless persons

Even though there have been limited or no funds available to support public services under the previous Con Plan, feedback indicated a need for greater access to essential human services such as food and emergency assistance within the community. Waterford Township recognizes that a compelling need exists despite overextended municipal budgets and pressure on existing local private resources and will seek to partner with local service providers if, and when, financial resources become available. Unfortunately, no funding was available during the last reporting cycle. However, as a community in the center of Oakland County, Waterford Township realizes that these problems are often regional problems and therefore lent its support during this past year to County wide efforts to increase its share of homeless funding. Specifically, information regarding upcoming events and/or services provided through other agencies that participate in the CoC are posted at Town Hall when made available. Further, the Township has consistently assisted, and will continue to do so in signing Certifications of Consistency with the Consolidated Plan for those organizations working through the County to address housing for special needs populations.

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

During the 2022-2023 CDBG Program Year, the Township was able to utilize \$133,750.27 in grant funds and program income to support the Emergency Housing Rehabilitation program which assisted 6 households: (1) extremely low, 3 low, and 2 moderate income families for 9 total individuals.

An additional \$23,543.99 was used to support the Rental and Mortgage Assistance programs which assisted (7) households: (3) very low-income families, (3) low-income families, and (1) moderate-income family.

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

As a community in the center of Oakland County, Waterford Township realizes that these problems are often regional problems and therefore lent its support during this past year to County wide efforts to increase its share of homeless funding. In this way, we are able to assist the County in the countywide battle on homelessness. Specifically, information regarding upcoming events and/or services provided through other agencies that participate in the CoC are posted at Town Hall when made available. Further, the Township has consistently assisted, and will continue to do so in signing Certifications of Consistency with the Consolidated Plan for those organizations working through the County to address housing for special needs populations.

CR-30 - PUBLIC HOUSING 91.220(H); 91.320(J)

Actions taken to address the needs of public housing

Waterford Township does not own nor maintain public housing. No action was taken to address the need.

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

Waterford Township does not own nor maintain public housing. No action was taken to address the need.

Actions taken to provide assistance to troubled PHAs

Waterford Township does not own nor maintain public housing. No action was taken to address the need.

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)

Waterford Township continued efforts to maintain its affordable housing stock through the implementation of its Housing Rehabilitation Urgent Needs Home Repair, the Rental Assistance, and Mortgage Assistance Programs. In part, these efforts help families who may otherwise be on the brink of homelessness stay in their homes. During the 2022-2023 CDBG Program Year, the Township was able to assist (11) households with housing rehabilitation or subsistence services.

A rapidly growing senior population is placing increased pressure on local communities. Particularly, the segment of the market of seniors who can't afford private housing, but don't qualify for government assistance, could become a political quagmire. In an effort to mitigate this growing concern, Waterford Township has implemented a few policy incentives to encourage the development of affordable senior housing units within the community. First, Waterford Township has established ordinance incentives that promote investment in independent living facilities. Specifically, an increase of the maximum dwelling units per buildable acre and an increase in the maximum height of proposed buildings may be granted to independent living facility developments over similar multi-family residential developments within the same zoning district.

Second, Waterford Township allows for the development of one accessory dwelling unit (an in-law suite) on single family residential properties with some conditions. During the 2021-2022 PY, the Township enacted a new zoning amendment to permit a higher density of multiple-family dwellings over commercial developments in certain commercial corridors. The Waterford Township Board recognizes that this zoning flexibility makes sense for environmental, lifestyle, and financial reasons.

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

Through the re-allocation of previous program years available funding not to exceed an amount equivalent to 15% of the total 48th PY allocation (\$54,913), Waterford Township was able to support a curb-to-curb transit service currently administered by the West Oakland Transportation Authority (WOTA) for seniors and disabled persons who live in Waterford. Clients were transported from their home to any location in Waterford. In addition, transportation was offered for medical appointments scheduled in surrounding areas on specific days and rides to nearby hospitals and other medical buildings directly surrounding the hospital were also provided on specific days. During this reporting cycle, Waterford Township's support attributed to an estimated (759) individuals over a total of (16,055) passenger trips that included an estimated (263) elderly persons, (154) persons with disabilities, and (311) elderly persons with disabilities.

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

Housing units funded with CDBG funds must meet Federal Lead-Based Paint (LBP) regulations. The Township operates a CDBG funded housing rehabilitation program on single-family, owner-occupied dwellings. The program has specific procedures which outline the steps to educate, test, contain and/or remediate LBP. Rehabilitation projects in which the structure was constructed before 1978 fall under the Federal LBP regulations. A lead hazard information pamphlet is provided to all perspective participants in the housing rehabilitation program. If the structure was built prior to 1978 and the project requested warrants it, a LBP risk assessment is conducted. The findings are incorporated into the specifications for the rehabilitation work. Contractors participating in the housing rehabilitation program doing work involving

lead-based paint must present documentation certifying them as a LBP certified contractor. An occupancy plan is developed to ensure occupants will not be exposed during site work. Results of clearance tests are provided to the homeowner.

Due to the scaling of costs, projects which would involve lead-based paint remediation are avoided.

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

The Township currently possesses no control over any anti-poverty resources aside from its annual CDBG funds. Historically, these funds have been utilized primarily for housing preservation through rehabilitation and for public improvements, all of which have been implemented to assist the Township's low- and moderate-income citizens. Such actions undoubtedly do have an indirect anti-poverty effect by ensuring that the low-moderate income housing stock and neighborhood public facilities are kept in such condition as to prevent families and individuals from becoming impoverished attempting to maintain the structural upkeep of their homes and neighborhood facilities with scarce or nonexistent financial resources. Furthermore, the assistance provided to rehabilitate homes and neighborhoods enables families and individuals to escape the dangers of becoming entrapped in the psychological poverty triggered by a surrounding environment that is deteriorating at a pace over which individuals believe they have no control.

Additionally, the Township has directed CARES Act funding received toward Mortgage and Rental Subsistence programs. While limited to qualifying individuals impacted by COVID, these programs have had a direct effect on mitigating individuals from entering poverty levels. Support from these programs will diminish greatly once this particular funding source is exhausted which is anticipated during PY2023.

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

The Charter Township of Waterford consolidated its building, engineering, community development, planning, code enforcement, and economic development efforts into one department in January 2013. Since then, efforts to take on a more robust economic development effort in the Township have stalled due to the limited staff and resources. As a result, a working environment that concentrates on being more efficient with staff time and labor has been created through development of better workflow processes. The objective of these efforts is to create a community planning and development system that will continue to respond to community demands effectively. As of PY2022, a dedicated Program Administrator has taken over management of all CDBG related matters.

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

Prior to PY2021, Waterford Township participated in the Oakland County HOME Consortium which greatly strengthened its knowledge of and access to the Oakland County CoC, other HUD-funded levels of government within Oakland County, and a broad network of social service agencies. Since leaving the organization, participation has been limited though the Township will continue to reach out to regional organizations for information and guidance and will direct individuals in need to the respective assistance agencies.

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

During the 2022-2023 CDBG Program Year, Waterford Township continued its goal of affirmatively furthering fair housing. Though our consultant, the Fair Housing Center of Metropolitan Detroit (FHC), is no longer in a grant supported contractual relationship with the Township, discussions have indicated that the organization will continue to provide fair housing services to the Township of Waterford. Through these

services, the FHC continues to investigate ongoing and new fair housing complaints. The FHC also continues to mail its newsletter to addresses in Waterford. The FHC further provides fair housing training services to employees of residential multi-family housing firms and/or agents who provide housing services to residents of Waterford. Waterford Township also provides assistance in the form of referrals, information dissemination and complaint processing to residents and non-residents wishing to relocate into the Township, landlords and tenants regarding fair housing law, equal opportunity for housing and tenant/landlord rights.

The Township has also begun evaluating its zoning ordinance and master plan. Several steps have been taken is further evaluating zoning and land use amendments. This includes expanding residential options into some existing business districts and reducing required unit sizes in multi-tenant buildings.

Additionally, the Township has begun coordinating with the Fair Housing Center of Metropolitan Detroit (FHC) and the Fair Housing Center of Southeast Michigan to develop additional strategies for furthering fair housing.

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

Waterford Township strives to review all activity proposals prior to funding recommendation and approval to ensure compliance with the national goals and objectives of the CDBG program and to ensure financial responsibility. To assist our efforts, staff works through such tools as its geographic information system to integrate its community development goals and objectives into the Township's traditional comprehensive planning efforts. Further, Waterford Township completes development of performance measurement standards when setting up the activities and applies them as a requirement for funding. Once projects are approved, the Township monitors them to ensure that all of its established goals and objectives are met. Waterford Township then evaluates funded activities against the set performance measurement outcomes.

The Development Services Department is the lead department for overseeing the CDBG program. This oversight involves coordinating with other Township departments and social organizations that may benefit from any CDBG funding to ensure compliance with applicable regulations. The Township publishes notices as required and has made additional information available through the Township's website and at the Township library, the Parks and Recreation Department, the Department of Public Works, and the Waterford Senior Center. The monitoring includes a combination of training; on-site visits, as needed; progress reports to collect data and invoice requests; and telephone, email and in-person communication. The Development Services Department will continue to monitor the program during the program year through reporting tools that track performance management strategies. In addition, the Township completes an annual financial and program audit through a second party provider. Staff also ensures that individual CDBG funded activities maintain an active outreach to minority businesses when seeking services to assist in the implementation of the CDBG funded project. Projects that involve labor must be competitively bid with women and minority owned businesses in mind at each step. In addition, staff of the housing rehabilitation actively solicit the participation of local minority contractors.

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.

The CDBG Program Year 2022 (CD048) Consolidated Performance Report (CAPER) was compiled and prepared over a period time beginning in July and ending in August 2023. Prior to submittal in September 2023, a public notice was placed on August 20, 2023, indicating that the report was available to the public for review prior to the presentation of the performance report at the September 26, 2023, Township Planning Commission Meeting.

No public comments were received prior to or during the meeting.

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.

The Township's program objectives have not changed. However, the Public Facilities and Infrastructure project that was intended for the 2022-2023 CDBG program year was paused and reallocated to evaluate an alternative funding source that is being considered to allow for a much wider implementation of sidewalk repairs and improvements.

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

No

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

There were no Section 3 qualifying projects or activities performed.

CR-58 – SECTION 3

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

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

Table 8 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
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.					

Table 9 – Qualitative Efforts - Number of Activities by Program

Narrative

There were no Section 3 qualifying projects or activities performed.