

Executive Summary of Substantial Amendment 2020-1: An Amendment to the Consolidated Plan 2016-2020, 2019 Annual Action Plan, and Citizen Participation Plan to facilitate CDBG-CV Funding

BACKGROUND

The March 27, 2020 passage of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136, provides \$5 billion in Community Development Block Grant funds to be used to prevent, prepare for, and respond to the Coronavirus (COVID-19). As an entitlement community, Waterford Township received \$215,575 in Community Development Block Grant-Coronavirus (CDBG-CV) funds from the Department of Housing and Urban Development (HUD). To expedite the disbursement of the Township's new CDBG-CV funds, via 24 CFR 5.110, the CARES Act authorized HUD to grant waivers to the public notice, public comment, and citizen participation plan requirements found in 24 CFR 91.105(2) and (k) and 24 CFR 91.40.

In addition to the public notice/comment waivers, the CARES Act also established the following regulatory waivers, all of which, Waterford Township will utilize under proposed Amendment 2020-1:

1. The public services cap of 15% is suspended for the Township's CDBG- CV funds.
2. The CARES Act permits the use of virtual public hearings when necessary for public health reasons.
3. The CARES Act permits Citizen Participation Plan Amendments and other Plan publications to occur concurrently. The Substantial Amendment to Waterford Township's 2016-2020 Con Plan will result in the allocation of \$215,575 of CDBG-CV funds and further address the Township's effort to comply with HUD's regulatory requirements in administering the community's CDBG Program, including CDBG-CV funds. The Amendment to the Township's Citizen Participation Plan will expedite the Township's disbursement of funds and accelerate the Township's COVID-19 recovery efforts.

Substantial Amendment 2020-1 amends the following areas of the existing Con Plan, 2019 Annual Action Plan, and Citizen Participation Plan in response to the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) and various waivers provided by the U.S. Department of Housing and Urban Development (HUD):

2016-2020 Consolidated Plan

- **SP-25 PRIORITY NEEDS – 91.415,91215(a)(2)**
Revised Priority Needs section to direct CDBG-CV funds in accordance with HUD guidelines (COVID-19 Response and Recovery).
- **SP-35 ANTICIPATED RESOURCES – 91.420(b),91.215(a)(4), 91.220(c)(1,2)**
Updated Available Resources section to account for CDBG-CV Funds
- **SP-45 GOALS – 91.415, 91.215(a)(4)**
Revised Goals section to direct CDBG-CV funds in accordance with HUD guidelines (COVID-19 Response and Recovery).

2019 Annual Action Plan

- **AP-05 EXECUTIVE SUMMARY – 91.200(c), 91220(b)**
Added language to the Executive Summary Section to direct CDBG-CV funds in accordance with HUD guidelines (COVID-19 Response and Recovery).
- **AP-15 EXPECTED RESOURCES – 91.420(b), 91.220(c)(1,2)**
Updated Available Resources section to account for CDBG-CV Funds
- **AP-20 ANNUAL GOALS AND OBJECTIVES -91.420, 91.220©(3)&(e)**
Revised Goals section to direct CDBG-CV funds in accordance with HUD guidelines (COVID-19 Response and Recovery).
- **AP-35 PROJECTS – 91.420,91.220(d)**
Updated project list to account for CDBG-CV funded activities
- **AP-38 PROJECT SUMMARY**
Updated project summary table to account for CDBG-CV funded activities

Citizen Participation Plan

- Updated language that clarifies the expedited process and use of waivers provided by HUD under the CDBG-CV allocation.

AMENDMENTS TO THE CONSOLIDATED PLAN

A copy of Waterford Township’s 2016-2020 Consolidated Plan (Con Plan) can be found on the Township’s webpage. The following are the proposed amendments to the Con Plan to direct CDBG-CV funds in accordance with HUD guidelines (COVID-19 Response and Recovery)..

SP-25 PRIORITY NEEDS – 91.415, 91.215(a)(2)

Under Substantial Amendment 2020-1, Waterford Township will update its Priority Needs Summary Table by adding an 8th priority need to accommodate CARES Act response with CDBG-CV funds (amendment language in italics below).

8	<i>Priority Need Name</i>	<i>Emergency Response</i>
	<i>Priority Level</i>	<i>High</i>
	<i>Population</i>	<i>Extremely Low Low Moderate Middle Large Families Families with Children Elderly</i>
	<i>Geographic Areas Affected</i>	<i>Entitlement Community</i>
	<i>Associated Goals</i>	<i>Public Services</i>
	<i>Description</i>	<i>Response to declared disaster or emergency event</i>
	<i>Basis for Relative Priority</i>	<i>The March 27, 2020 passage of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136, provides \$5 billion in Community Development Block Grant funds to be used to prevent, prepare for, and respond to the Coronavirus (COVID-19). As an entitlement community, Waterford Township received \$215,575 in Community Development Block Grant-Coronavirus (CDBG-CV) funds from the Department of Housing and Urban Development (HUD). To expedite the disbursement of the Township’s new CDBG-CV funds, via 24 CFR 5.110, the CARES Act authorized HUD to grant waivers to the public notice, public comment, and citizen participation plan requirements found in 24 CFR 91.105(2) and (k) and 24 CFR 91.40.</i>

SP-35 ANTICIPATED RESOURCES – 91.420(b), 91.215(a)(4), 91.220(c)(1,2)

Under Substantial Amendment 2020-1, Waterford Township will add the following language to the Anticipated Resources introduction section (amendment language in italics below).

The Office of Community Planning and Development at the U.S. Department of Housing and Urban Development (HUD) allocated \$215,575 of CDBG-CV funds on April 2, 2020. CDBG-CV funds may be used to assist in the Township’s response to the effects of the Coronavirus pandemic, such as community development needs including the provision of post-COVID-19 recovery emergency assistance to non-profits, small businesses, and low and moderate income residents.

Under Substantial Amendment 2020-1, Waterford Township will update its “Anticipated Resources” table to include expected CDBG-CV funding (in italics). Note, while the CDBG-CV funding has been added, CDBG allocations noted in the updated “Expected Resources” table date from the initial 2016- 2020 ConPlan fiscal year will remain unchanged.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	390,000	20,000	145,000	555,000	1,591,750	Approximately \$390,000 in CDBG entitlement grant funds each program year plus approximately \$20,000 in program income generated each program year
<i>CDBG-CV</i>	<i>public - federal</i>	<i>Prevent, Prepare, and respond to COVID 19</i>				<i>\$214,575</i>		<i>Special Allocation of Funding</i>

SP-45 GOALS – 91.415, 91.215(a)(4)

Under Substantial Amendment 2020-1, Waterford Township will update its Goal Summary table by adding an 8th goal to accommodate CARES Act response with CDBG-CV funds (amendment language in italics below).

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	<i>Emergency Response</i>	2020	2022	<i>Emergency response to COVID 19</i>	<i>Waterford Township</i>	<i>Emergency Response</i>	<i>CDBG-CV</i> \$214,575	<i>Other: \$215,575 other</i>

Under Substantial Amendment 2020-1, Waterford Township will update its Goal Description table by adding an 8th goal description to accommodate CARES Act response with CDBG-CV funds (amendment language in italics below).

8	Goal Name	<i>Emergency Response</i>
	Goal Description	<i>Emergency response to prevent, prepare for and respond to declared disasters and emergency events like coronavirus</i>

AMENDMENTS TO THE 2019 ANNUAL ACTION PLAN

A copy of Waterford Township's 2019 Annual Action Plan (AAP) can be found on the Township's webpage. The following are the proposed amendments to the AAP to direct CDBG-CV funds in accordance with HUD guidelines (COVID-19 Response and Recovery).

AP-05 EXECUTIVE SUMMARY – 91.200(c), 91220(b)

Under Substantial Amendment 2020-1, Waterford Township will add the following language to the introduction section (amendment language in italics below).

The March 27, 2020 passage of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136, provides \$5 billion in Community Development Block Grant funds to be used to prevent, prepare for, and respond to the Coronavirus (COVID-19). As an entitlement community, Waterford Township received \$215,575 in Community Development Block Grant-Coronavirus (CDBG-CV) funds from the Department of Housing and Urban Development (HUD). To expedite the disbursement of the Township's new CDBG-CV funds, via 24 CFR 5.110, the CARES Act authorized HUD to grant waivers to the public notice, public comment, and citizen participation plan requirements found in 24 CFR 91.105(2) and (k) and 24 CFR 91.40.

The CARES Act also authorized the HUD Secretary to grant waivers and alternative requirements related to the use of CDBG-CV funds, including the suspension of the 15 percent cap on funding for public services; reducing the public comment period for consolidated plan and action plan amendments to five days, and allowing the option of virtual hearings. To expedite and facilitate the use of these funds Waterford Township will, as necessary, avail itself of the additional flexibility being provided, request available waivers, and request permission to use alternative requirements of statutes and regulations with the use of CDBG-CV funds. All eligible CDBG-CV activities must meet one of the national objectives which are: (1) Benefit to low- and moderate-income (LMI) persons; (2) Aid in the prevention of slums or blight; and (3) Meet a need having a particular urgency. The Township may undertake CDBG-eligible activities to meet needs resulting from declared disasters or emergencies under any one of the three national objectives.

Waterford Township is part of the Oakland County HOME Consortium, which has coordinated efforts to develop an emergency and public health response to prevent, prepare for, and respond to COVID-19. The Township has developed a comprehensive operational and funding plan utilizing CDBG-CV funds which WILL BE ADOPTED by the Waterford Township Board of Trustees on June 22, 2020.

Waterford Township seeks approval of a Substantial Amendment to the Program Year (PY) 2016-2020 Consolidated Plan, PY 2019 One-Year Action Plan and Citizen Participation Plan in order to submit its COVID response plan to HUD. The 2019 One-Year Action Plan amendment identifies proposed activities for the expenditure of CDBG-CV to address the COVID -19 crisis. Newly funded activities are scheduled to begin implementation as soon as agreements are executed. The substantial amendment funding must be committed prior to September 30, 2022.

Under Substantial Amendment 2020-1, Waterford Township will add the following language to the Summary of Citizen Participation Process and Consultation Process section (amendment

language in italics below).

*The Citizen Participation Plan was amended to utilize the Public comment waiver issued by HUD with the CDBG-CV allocation to the Township. A public meeting, public notice and phone conversations were utilized to solicit participation. The Waterford Township Board of Trustees held a virtual public hearing on June 22, 2020. _____ people attended and inquired about the CDBG-CV program. The Township posted a comment period from June 12, 2020 to June 23, 2020 to meet the minimum 5 day public comment period. The Public Notice was published in the Oakland Press, a local newspaper, available via the city web page and hard copy via US Postal or pick up at Township Hall. Comments are part of the consideration for funding priorities as well as other federal funding availability to meet the needs specified and the amount of funding available. Comments received during the Consolidated Plan amendment process indicated support for the proposed projects funded through CDBG-CV program funding.
written comments were received on the Annual Plan.*

Under Substantial Amendment 2020-1, Waterford Township will add the following language to the Section (amendment language in italics below).

*For the CDBG-CV program and related plan amendments, Waterford Township Board of Trustees held a virtual public hearing on June 22, 2020. The Township posted a notice of the public hearing held on June 22, 2020 and the public comment period between June 12, 2020 and June 23, 2020 on June 11, 2020, exceeding the minimum 5 day comment period, on Township’s web page and in the Oakland Press.
written public comment was received.*

AP-15 EXPECTED RESOURCES – 91.420(b), 91.220(c)(1,2)

Under Substantial Amendment 2020-1, Waterford Township will update its “Anticipated Resources” table to include expected CDBG-CV funding (in italics).

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG-CV	Other: public - federal	Other: Emergency response for the prevention, preparation for COVID-19	\$214,575			\$214,575	CDBG-CV funds to be used to prevent, prepare and respond to the coronavirus	

AP-20 ANNUAL GOALS AND OBJECTIVES -91.420, 91.220©(3)&(e)

Under Substantial Amendment 2020-1, Waterford Township will update its Goal Summary table by adding a 7th goal to accommodate CARES Act response with CDBG-CV funds (amendment language in italics below).

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Emergency Response	2020	2022	Emergency Response	Waterford Township	Emergency Response, Public Service, Urgent Need	CDBG-CV \$214,575	Other: 1 Other

Under Substantial Amendment 2020-1, Waterford Township will update its Goal Description table by adding a 7th goal description to accommodate CARES Act response with CDBG-CV funds (amendment language in italics below).

7	Goal Name	<i>Emergency Response</i>
	Goal Description	<i>Emergency response to prevent, prepare for and respond to declared disasters and emergency events like coronavirus</i>

AP-35 PROJECTS – 91.420, 91.220(d)

Under Substantial Amendment 2020-1, Waterford Township will update its Project table by adding CDBG-CV projects to accommodate CARES Act response with CDBG-CV funds (amendment language in italics below).

#	Project Name
1	Program Administration
2	Housing Rehabilitation
3	Code Enforcement
4	Public Service- Senior Disabled persons curb-to-curb transit program
5	Public Facilities & infrastructure – sidewalk improvement project
6	Public Facilities & infrastructure – Senior Center Rehabilitation Project
7	Public Facilities & infrastructure – Parks, Recreation Facilities Project
8	<i>CDBG-CV-19-01 Rental Subsistence Payment Program</i>
9	<i>CDBG-CV-19-02 Public Service Assistance for Non-Profit Agencies</i>
10	<i>CDBG-CV-19-03 Personal Protective Equipment (PPE) For First Responders</i>
11	<i>CDBG-CV-19-04 Program Administration</i>

AP-38 PROJECT SUMMARY

Under Substantial Amendment 2020-1, Waterford Township will update its Project Summary table to by adding the summaries of the CDBG-CV projects (amendment language in italics below).

8	Project Name	CDBG-CV-19-01 Rental Subsistence Payment Program
	Target Area	Waterford Township
	Goals Supported	Emergency Response
	Needs Addressed	Provide rental subsistence to low and moderate income renters of Waterford Township
	Funding	CDBG-CV: \$60,000
	Description	<i>Provide rental payment subsistence assistance to low to moderate income renters impacted Waterford Township residents who have lost their job, been furloughed, or had their hours reduced because of the economic impact of COVID-19. Payments are made directly to the landlord or vendor providing the housing on behalf of the qualified resident. Eligible residents include those living in households with incomes at or below 80% AMI and can provide documentation of need due to the applicable impact of COVID-19, etc. Assistance will be provided to qualified rental households on a first come first serve basis until the allocated funds are exhausted or the assistance program is no longer found to be necessary. Assistance cannot exceed the actual cost of the rent and shall be in the spirit area FMR as well as HUD's standard of rent reasonableness. 24 CFR § 570.207 (4) Income payments states The general rule is that CDBG funds may not be used for income payments. For purposes of the CDBG program, "income payments" means a series of subsistence-type grant payments made to an individual or family for items such as food, clothing, housing (rent or mortgage), or utilities, but excludes emergency grant payments made over a period of up to three consecutive months to the provider of such items or services on behalf of an individual or family.</i>
	Target Date	<i>June 1, 2020-September 30, 2022</i>
	Estimate the number and type of families that will benefit from the proposed activities	<i>20 low to moderate income renters</i>
	Location Description	<i>Township wide.</i>
	Planned Activities	<i>Rent subsistence program</i>

9	Project Name	<i>CDBG-CV-19-02 Public Service Assistance for Non-Profit Agencies</i>
	Target Area	<i>Waterford Township</i>
	Goals Supported	<i>Emergency Response</i>
	Needs Addressed	<i>Emergency Response</i>
	Funding	<i>CDBG-CV: \$60,000</i>
	Description	<p>Assistance to non-profit agencies in providing basic needs to support activities that relate to their coronavirus and other infectious disease responses. Services may include, but are not limited, to activities to assist senior services, food banks, substance abuse, domestic violence survivors, housing legal services, food and shelter, and additional case management opportunities. Assistance will be provided to qualified non-profit agencies on a first come first serve basis until the allocated funds are exhausted or the assistance program is no longer found to be necessary. 24CFR570.201(e) Public services. Provision of public services (including labor, supplies, and materials) including but not limited to those concerned with employment, crime prevention, child care, health, drug abuse, education, fair housing counseling, energy conservation, welfare (but excluding the provision of income payments identified under §570.207(b)(4)), homebuyer down payment assistance, or recreational needs. To be eligible for CDBG assistance, a public service must be either a new service or a quantifiable increase in the level of an existing service above that which has been provided by or on behalf of the unit of general local government (through funds raised by the unit or received by the unit from the State in which it is located) in the 12 calendar months before the submission of the action plan. (An exception to this requirement may be made if HUD determines that any decrease in the level of a service was the result of events not within the control of the unit of general local government.) The amount of CDBG funds used for public services shall not exceed paragraphs (e) (1) or (2) of this section, as applicable:</p>
	Target Date	<i>June 1, 2020-September 30, 2022</i>
	Estimate the number and type of families that will benefit from the proposed activities	<i>20 low to moderate income residents</i>
	Location Description	<i>Township wide.</i>
Planned Activities	<i>Provide assistance to sub-recipient non-profit agencies in providing basic needs to support activities that relate to their coronavirus and other infectious disease responses.</i>	

10	Project Name	<i>CDBG-CV-19-03 Personal Protective Equipment (PPE) For First Responders</i>
	Target Area	Waterford Township
	Goals Supported	Emergency Response
	Needs Addressed	Emergency Response
	Funding	CDBG-CV: \$60,000
	Description	<i>Support provided to assist COVID-19 response performed by the Township's first responders. Support includes equipment, supplies, and materials necessary to carry-out COVID-19 response services performed by first responders for Township residents. Assistance will be provided until the allocated funds are exhausted or the support program is no longer found to be necessary. 24CFR570.201(e) Public services. Provision of public services (including labor, supplies, and materials) including but not limited to those concerned with employment, crime prevention, child care, health, drug abuse, education, fair housing counseling, energy conservation, welfare (but excluding the provision of income payments identified under §570.207(b)(4)), homebuyer down payment assistance, or recreational needs. To be eligible for CDBG assistance, a public service must be either a new service or a quantifiable increase in the level of an existing service above that which has been provided by or on behalf of the unit of general local government (through funds raised by the unit or received by the unit from the State in which it is located) in the 12 calendar months before the submission of the action plan. (An exception to this requirement may be made if HUD determines that any decrease in the level of a service was the result of events not within the control of the unit of general local government.) The amount of CDBG funds used for public services shall not exceed paragraphs (e) (1) or (2) of this section, as applicable:</i>
	Target Date	<i>June 1, 2020-September 30, 2022</i>
	Estimate the number and type of families that will benefit from the proposed activities	<i>Not Applicable</i>
Location Description	Township wide.	
Planned Activities	<i>Support provided to assist COVID-19 response performed by the Township's first responders. Support includes equipment, supplies, and materials necessary to carry-out COVID-19 response services performed by first responders for Township residents.</i>	

11	Project Name	<i>CDBG-CV-19-04 Program Administration</i>
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Target Area	Waterford Township
Goals Supported	Emergency Response
Needs Addressed	Emergency Response
Funding	CDBG-CV: \$34,575
Description	<i>Funds will be provided for the general administration of the CDBG-CV Program. This will include necessary supplies, services, capital expenses, and the wages and fringe benefits for the percentage of time spent by staff in administering the overall CDBG-CV Program. 24CFR570.206 Payment of reasonable administrative costs and carrying charges related to the planning and execution of community development activities assisted in whole or in part with funds provided under this part and, where applicable, housing activities (described in paragraph (g) of this section) covered in the recipient's housing assistance plan. This does not include staff and overhead costs directly related to carrying out activities eligible under 570.201 through 570.204 since those costs are eligible as part of such activities.</i>
Target Date	<i>June 1, 2020-September 30, 2022</i>
Estimate the number and type of families that will benefit from the proposed activities	Not Applicable
Location Description	Township wide.
Planned Activities	<i>Funds will be provided for the general administration of the CDBG-CV Program.</i>

AMENDMENT TO CITIZEN PARTICIPATION PLAN

A copy of the amended Citizen Participation Plan can be found on the Township's webpage. This document serves as the Township's Substantial Amendment submittal to HUD for the following federal resources

Additionally, under this Substantial Amendment, Waterford Township is including an amended Citizen Participation Plan. The Township's amendment to the Citizen Participation

Plan reflects adjustments to the public participation process as per the receipt of HUD's waivers and regulatory guidance.

In response to the urgency of the COVID-19 pandemic, the Department of Housing and Urban Development released a series of waivers to streamline the approval process while also providing opportunities for the public to submit comments. Specifically, to expedite actions to respond to COVID-19, per 24 CFR 5.110, HUD waived the Consolidated Plan requirements of 24 CFR 91.105(c)(2) and (k), 91.115(c)(2) and (i) in order to balance the need to respond quickly to the growing spread and effects of COVID-19 with the statutory requirement to provide reasonable notice and opportunity for citizens to comment on substantial amendments concerning the proposed uses of CDBG and HOME funds.

Waterford Township's Community Development Block Grant Coronavirus (CDBG-CV) Program is a special allocation, which was authorized by the CARES Act, Public Law 116-136 to respond to the Coronavirus pandemic crisis. The Township will use these funds to provide gap funding assistance to its residents, businesses, and non-profit agencies to further prevent, prepare for, and respond to the Coronavirus. Should additional funds be made available, the Township will allocate these funds via its Substantial Amendment process as necessary.