



September 11, 2024

Joseph M. Murphy
Director of Planning
Community Development Department
City of Royal Oak

Emailed

SUBJECT: Fiscal Year 2024 Grant Agreement Transmittal

Dear Joseph Murphy:

The Detroit Field Office would like to thank you for your continued partnership in providing quality affordable housing, a suitable living environment, and expanding economic opportunities for low-and moderate-income persons through the Department of Housing and Urban Development (HUD) programs.

One Grant Agreement is attached for each program awarded as follows:

Community Development Block Grant Program (CDBG)	\$ 1,179,934.00
Total FY 2024 Award	\$ 1,179,934.00

Plan Approval

Transmittal of a grant agreement does not constitute approval of the activities described in your Consolidated Plan. You are reminded that you, as grantee, are responsible for ensuring that all grant funds are used in accordance with all program requirements. By executing the Grant Agreement (or Funding Approval/Agreement) you will be entering into a legally binding agreement with HUD to use the awarded funds and carry out the funded activities in accordance with all Federal statutes, regulations, and award terms and conditions that apply to those funds and activities.

Please note the special conditions that may be attached to each agreement.

Affirmatively Furthering Fair Housing

On February 9, 2023, HUD published in the Federal Register a [Notice of Proposed Rulemaking \(NPRM\) entitled “Affirmatively Furthering Fair Housing.”](#) The proposed rule implements the Fair Housing Act’s statutory mandate to affirmatively further fair housing (AFFH), which directs HUD to ensure that the agency and its program participants proactively take meaningful actions to overcome patterns of segregation, promote fair housing choice, eliminate disparities in opportunities, and foster inclusive communities free from discrimination. The public comment period ended on April 24, 2023, and HUD is in the process of finalizing the

rule. More information, including a Fair Housing Planning Toolkit, updates, and, once published, the final rule, is available [here](#). *The AFFH Interim Final Rule (86 FR 30779) remains in effect during proposed rulemaking.*

Preventing Waste, Fraud, and Abuse and Whistleblower Protections

Preventing waste, fraud, and abuse of Federal funds is a shared responsibility and any person who becomes aware of the existence or apparent existence of fraud, waste or abuse of any HUD award must report such incidents to both the HUD official responsible for the award and to HUD's Office of Inspector General (OIG). HUD OIG is available to receive allegations of fraud, waste, and abuse related to HUD programs via its hotline number (1-800-347-3735) and its [online hotline form](#).

Please be reminded of the Whistleblower Protection requirements contained in 41 U.S.C. § 4712, which, as amended, protect employees of a government contractor, subcontractor, grantee, and subgrantee from retaliation or reprisal as a result of protected disclosures of gross mismanagement, gross waste, abuse of authority, and other violations in connection with Federal contracts or grants. Grantee must inform employees in writing of their rights and remedies.

Federal Funding Accountability and Transparency Act (FFATA)

The FFATA Subaward Reporting System (FSRS) is a reporting tool that Federal prime awardees (i.e., prime grant recipients and prime contractors) use to capture and report subaward and executive compensation data to meet the FFATA reporting requirements. For FSRS reporting, prime awardees will report on all subawards they make. In accordance with 2 CFR part 170, prime awardees awarded a Federal grant are required to file a FFATA subaward report by the end of the month following the month in which the prime awardee awards any subaward equal to or greater than \$30,000 in Federal funds. Additional information can be found on the FSRS website, at <https://www.fsrs.gov/>.

Revised Federal Uniform Guidance (2 CFR Part 200)

In April 2024, the Office of Management and Budget (OMB) issued revised OMB Guidance for Grants and Agreements, which is now called the OMB Guidance for Federal Financial Assistance. In this update, there have been significant changes made to 2 CFR Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, commonly known as the "Uniform Guidance." More information on these revision is available [here](#) and [here](#). Of particular note, the revisions increase of the **Single Audit threshold** from \$750,000 to \$1 million and the *de minimis* indirect cost rate will increase from 10 percent to up to 15 percent of Modified Total Direct Costs (MTDC). The revisions to 2 CFR Part 200, Subpart F (Audit Requirements) will be effective for fiscal years beginning on or after October 1, 2024. The rest of the changes will take effect on October 1, 2024, for (1) awards issued on or after October 1, 2024, and (2) awards HUD has expressly made subject to the regulations as may be amended.

Environmental Review Requirements

You are reminded that all activities are subject to the provisions at 24 CFR Part 58 (Environmental Review Procedures). Furthermore, funds for certain activities may not be obligated or expended until HUD has approved a Request for Release of Funds (RROF) and issued an Authority to Use Grant Funds (AUGF). A RROF must be signed by a certifying officer and submitted to HUD along with proof of public notice. Until the AUGF has been issued, no HUD funds can be committed. If the project or activity is Exempt per 24 CFR 58.34 or Categorically Excluded Not Subject to 58.5 per 24 CFR 58.35(b), no RROF is required.

On April 23, 2024, HUD published the [Federal Flood Risk Management Standard \(FFRMS\) Final Rule](#) to better protect communities from flooding. This Rule amends HUD's existing floodplain regulations to require a greater level of flood protection for HUD-funded projects. The Rule, with a compliance date of June 24, 2024, applies to all CPD programs (with the exception of HTF) as part of the environmental review process. Additional information can be found at https://www.hud.gov/program_offices/comm_planning/environment_energy/ffrms.

Build America, Buy America (BABA)

The Build America, Buy America (BABA) Act established a Buy America Preference (BAP) which requires that certain CPD-funded infrastructure projects procure all iron and steel, construction materials, and manufactured products from domestic sources, unless exempted by a general or project-specific waiver. HUD issued a Phased Implementation Waiver that phases in the BAP based on the program funding and materials used. In FY24, the BAP will apply to additional covered CPD programs and materials. Grantees are encouraged to utilize BABA resources on the [HUD Exchange](#), including the CPD BABA Implementation Guidance, for information on how to determine if the BAP applies to a specific project and resources to maximize the flexibilities provided by current HUD general waivers.

Executing the Grant Agreement

Please execute each attached Grant Agreement with electronic signature and date, and return a digital copy to DetroitCPD@hud.gov with a Cc to your CPD Representative Darrick Mallad D.T.Mallad@hud.gov and Senior Financial Analyst Cindy Vails (Cynthia.C.Vails@hud.gov). Please ensure the Chief Elected Official or authorized official electronically signs the agreement and maintain a copy of each signed agreement in your local program files.

Indirect Cost Rate Addendum: New for FY2024, the authorized official **must** complete the Indirect Cost Rate Addendum to each agreement. Please mark one (and only one) checkbox to reflect how indirect costs will be calculated and charged under the grant. Complete this section in full by applying the authorized official's name, title, date, and signature. **For grantees electing to use the *de minimis* indirect cost rate:** As noted above, under the 2024 Revisions to 2 CFR Part 200, the *de minimis* indirect cost rate will increase from 10 percent to up to 15 percent of MTDC. For FY2024 grants, any grantee that elects to use the *de minimis* indirect cost rate, and indicates this selection on the Indirect Costs Rate Addendum to the agreement (2nd checkbox), is permitted

to utilize the *de minimis* rate of up to 15 percent when the 2 CFR revisions become effective on October 1, 2024, regardless of whether the grant agreement is executed before, on, or after October 1, 2024. However, Grantees using the *de minimis* rate may only apply the higher rate to MTDC amounts that are incurred on or after October 1, 2024.

For additional information and guidance on grant-based accounting, please refer to the HUD Exchange at: <https://www.hudexchange.info/manage-a-program/grant-based-accounting/>.

To establish a Line of Credit for Fiscal Year 2024 grant funds, you will need to sign, execute and return one copy of each agreement. If you need to add or remove individuals authorized to access the Integrated Disbursement Information System (IDIS), please complete an IDIS Online Access Request Form (HUD 27055), notarize it, and return it to this office. Additionally, if you need to establish or change the depository account where these funds are to be wired, a Direct Deposit Sign-Up form (SF-1199A) must be completed by your financial institution and returned to this office with a copy of a voided check.

HUD congratulates the City of Royal Oak on your grant award, and we look forward to assisting you in accomplishing your programs goals. If you have any questions or need further information or assistance, please contact Darrick Mallad, CPD Representative at (313) 234-7328 or Darrick.T.Mallad@hud.gov.

Sincerely,

Keith E. Hernández, AICP, PMP
Director
Office of Community Planning and Development

Enclosures

Executive Summary

AP-05 Executive Summary - 91.200(c), 91.220(b)

1. Introduction

The City of Royal Oak's CDBG objective is to address the housing, non-housing and community development needs of the low- to moderate-income residents by taking advantage of opportunities to ensure decent and affordable housing, a suitable living environment and where applicable, expand economic development opportunities. This document will govern the CDBG-funded activities and initiatives, and how they achieve these objectives, for PY2024 (July 1, 2024 - June 30, 2025).

Location Map

City of Royal Oak relative to Metropolitan Detroit



location map - City of Royal Oak, Michigan

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The City of Royal Oak has developed the following community needs priorities / objectives in the PY2021 - PY2025 Consolidated Plan:

Housing

Affordable Owner-Occupied & Renter-Occupied Housing

To preserve and increase the supply of affordable owner-occupied and renter-occupied housing for low- to moderate-income residents through housing rehabilitation, new construction, advocacy, policies, and regulations.

Special Needs Housing

To preserve and increase the supply of affordable housing with supportive services for special needs populations, including the frail elderly and disabled persons through housing rehabilitation, new construction, advocacy, policies, and regulations.

Fair Housing Choice

To promote and ensure fair housing choice for all residents.

Homeless

Immediate Shelter Needs of the Homeless

To support the immediate, temporary shelter needs of those experiencing homelessness.

Public Services That Benefit the Homeless

To support public services that help those experiencing homelessness so they may immediately seek a more stable setting and gain access to network of services to achieve self-sufficiency.

Non-Homeless Special Needs

Public Services That Benefit Special Needs Population

To support and facilitate access to the wide variety of existing public services that may enhance life skills and self-sufficiency.

Neighborhood Investment

Public Improvements & Facilities

To create new or improved public facilities and infrastructure in CDBG Target Areas by identifying, designing, and implementing unique projects.

Redevelopment of Blighted Properties

To eliminate individual instances of blight and create economic job opportunities and/or below market rate multiple-family housing.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

Staff recommends policies and funding allocations based on past performances. Below are just a few examples.

Single-family homes represent approximately 62% of the city's total land uses. The overwhelming majority (63.3%) of these single-family homes were built prior to 1960. Since the inception of the CDBG program, Royal Oak has allocated tremendous resources to assist low- to moderate-income single-family homeowners maintain and renovate their homes. The program is designed to provide no and low interest loans, also forgivable loans for rehabilitation projects. It ensures affordability and preserves the aging housing stock. It's been successful at stabilizing neighborhoods city-wide. Royal Oak continues to allocate CDBG resources to this activity.

In the fall of 2013, Royal Oak completed a large infrastructure project by leveraging CDBG funds from three program years. This project was able to transform a blighted corridor and has led to greater interest in real estate along the corridor. While it is difficult to allocate funds over several program years and meet Housing of Urban Development (HUD)'s timeliness of expenditure requirements, Royal Oak believes that these types of projects will have a larger impact on a corridor or neighborhood versus small scale projects spread across the entire city each program year. Royal Oak will continue to identify, design, and implement unique projects which transform corridors and neighborhoods.

Additionally, several years ago, Royal Oak utilized CDBG funds to purchase and demolish a blighted property within the corridor. Upon completion of the large infrastructure project, developers began to approach the city to purchase and redevelop the once blighted property. The property has been sold to a developer who has approval to build a new concept of small-scale apartments. While this type of living environment is underway in other metropolitan areas around the country, no other developer in the metro Detroit area has embarked on such an endeavor. The developer specifically selected the property and type living environment due to the CDBG-funded infrastructure improvements which created a more pedestrian friendly corridor to neighborhoods and downtown.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

On October 10, 2023, staff provided notice of the release of the application for PY2024 funded activities to 57 local service agencies, religious institutions, adjacent communities, county government agencies, senior housing developments, etc. The notice identified the process for funding to help the city address its priority needs.

The Royal Oak Rehabilitation Board of Appeals, in its advisory role for the CDBG program, held public hearing at its September 26, 2023 meeting regarding the development of the PY2024 Annual Action Plan. Unfortunately, the Rehabilitation Board of Appeals' April 16, 2024 meeting was cancelled due to the lack of a quorum. A second public hearing was scheduled for the meeting. Therefore, the Royal Oak City Commission held a public hearing at their May 13, 2024 meeting. No comments were received during the public hearing.

Additionally, public hearings notices were published in the print and online edition of The Daily Tribune and posted to the CDBG webpage of the city's website. The notice referenced that the draft PY2024 Annual Action Plan is available for review on the city's website at the specific web address or in-person at City Hall.

Notice of the 30-day comment period was published in April 26, 2024 edition of The Daily Tribune and posted to the CDBG webpage of the city's website. The notice references that the draft PY2024 Annual Action Plan is available for review on the City's website at the specific web address or in-person at City Hall. No comments were received during the public comment period which ended May 20, 2024.

City of Royal Oak Community Development Block Grant (CDBG) program

Applications for financial funding are now being accepted regarding the city's upcoming CDBG program year (July 1, 2024 – June 30, 2025).
Applications are due no later than January 31, 2024.

The application package is accessible at (www.romi.gov/280/Application-Documents)

Free free to distribute this notice to any agency / organization servicing residents of the City of Royal Oak.

postcard notice



MICHIGAN GROUP

AFFIDAVIT OF PUBLICATION
2125 Butterfield Dr, Suite 102N • Troy MI 48084

City of Royal Oak
203 S TROY

ROYAL OAK, MI 48067
Attention: Joseph Murphy

STATE OF MICHIGAN,
COUNTY OF OAKLAND

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

City of Royal Oak

Published in the following edition(s):

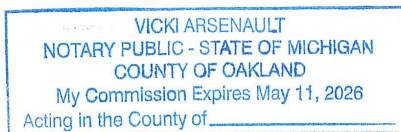
Oakland Press	09/13/23
theoaklandpress.com	09/13/23
Royal Oak Tribune	09/13/23

**CITY OF ROYAL OAK
REHABILITATION BOARD OF APPEALS
PUBLIC HEARING NOTICE**

NOTICE is hereby given that the Royal Oak Rehabilitation Board of Appeals, in its advisory role for the community development block grant (CDBG) program, will hold a public hearing at city hall, room 122, 203 S Troy St, Royal Oak, Michigan on Tuesday, September 26, 2023 at 7:00 p.m. to hear public comment pertaining to the city's community development needs for the program year 2024 annual action plan.

All interested parties are invited to attend the public hearing or provide written comments to the Planning Division of Royal Oak Community Development Department, 203 S Troy St, Royal Oak MI 48067. Alternatively, members of the public may provide comments via e-mail at <https://www.romi.gov/formcenter/Planning-20/Contact-Us-Planning-118> by no later than Tuesday, September 26, 2023, at 12:00 p.m. When sending an e-mail message, please title the subject line of the message as "CDBG public comment". Anyone planning to attend the meeting who has need of special assistance under the Americans with Disabilities Act (ADA) is asked to contact the City Clerk's office at 248-246-3050 at least two (2) business days prior to the meeting.

Timothy E. Thwing, Director of Community Development



Sworn to the subscribed before me this 13 Sept, 2023

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

Advertisement Information

Client Id: 645335

Ad Id: 2515388

PO:

Sales Person: 200308

affidavit - September 26, 2023 public hearing

Annual Action Plan
2024

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2125 Butterfield Dr, Suite 102N • Troy MI 48084

City of Royal Oak
203 S TROY

ROYAL OAK, MI 48067
Attention: Joseph Murphy

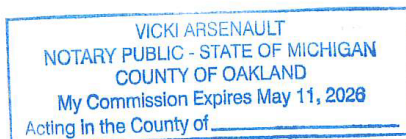
STATE OF MICHIGAN,
COUNTY OF OAKLAND

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

City of Royal Oak

Published in the following edition(s):

Oakland Press	04/26/24
theoaklandpress.com	04/26/24
Royal Oak Tribune	04/26/24



Sworn to the subscribed before me this 1 May, 2024.
Vicki Arsenault
Notary Public, State of Michigan
Acting in Oakland County

Advertisement Information

Client Id: 645335

Ad Id: 2593138

PO:

Sales Person: 200309

**CITY OF ROYAL OAK
PUBLIC HEARING NOTICE**

It is anticipated that the City of Royal Oak will receipt approximately \$1,180,079 of Community Development Block Grant (CDBG) funds from the U.S. Department of Housing & Urban Development (HUD) for PY2024 (July 1, 2024 - June 30, 2025). As of April 17, 2024, HUD has not yet notified the City of the exact dollar amount.

Notice is hereby given that the Royal Oak City Commission will hold a regular meeting on Monday, May 13, 2024, at 7:30 p.m. in City Commission Chambers on the first floor of City Hall at 203 S. Troy St., Royal Oak, Michigan, to hear public comments pertaining to the development of the city's PY2024 CDBG Annual Action Plan. A draft version of the document may be found on the city's website at: <https://www.romi.gov/280/Application-Documents>. Its also available for viewing at the Planning Division of the City's Community Development Department.

Individuals may present their comments at the meeting, or by e-mail at joem@romi.gov, or by mail addressed to the Royal Oak City Commission, re: CDBG, 203 S. Troy St., Royal Oak, MI 48067. For additional information contact the Planning Division at (248) 246-3285. Anyone planning to attend the meeting who has need of special assistance under the Americans with Disabilities Act (ADA) is asked to contact the City Clerk's office at 248-246-3050 at least two (2) business days prior to the meeting.

Joseph M. Murphy, Director of Planning

affidavit - May 13, 2024 public hearing

Annual Action Plan
2024

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MICHIGAN GROUP

AFFIDAVIT OF PUBLICATION
2125 Butterfield Dr, Suite 102N • Troy MI 48084

City of Royal Oak
203 S TROY

ROYAL OAK, MI 48067
Attention: Joseph Murphy

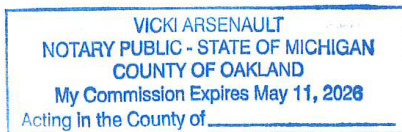
STATE OF MICHIGAN,
COUNTY OF OAKLAND

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Royal Oak Tribune	04/19/24



Sworn to the subscribed before me this 23 April, 2024
Vicki Arsenault
Notary Public, State of Michigan
Acting in Oakland County

Advertisement Information

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Ad Id: 2593130

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Sales Person: 200309

CITY OF ROYAL OAK
30-DAY PUBLIC COMMENT PERIOD NOTICE
Notice is hereby given that a draft copy of the City of Royal Oak's Community Development Block Grant (CDBG) PY2024 Annual Action Plan is available for review and public comment. The documents will be available for a 30-day public comment period through May 20, 2024. A summary of the proposed activities and funding levels is provided below. The document is available for download on the City of Royal Oak's website at romi.gov/280/Application-Documents. The city will take all reasonable steps to provide a copy to disabled persons and non-English speaking persons. Written comments will be accepted by mail to the attention of Joseph M Murphy, Director of Planning, 203 S Troy St, Royal Oak MI 48067 or electronically at: joem@romi.gov
City of Royal Oak
Joseph M Murphy, Director of Planning

RECEIVED

MAY 2 2024

City of Royal Oak
Community Development

proof - 30 day comment period

Annual Action Plan
2024

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5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

None provided.

6. Summary of comments or views not accepted and the reasons for not accepting them

Not applicable. No comments provided.

7. Summary

-

PR-05 Lead & Responsible Agencies - 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role		Name	Department/Agency
CDBG Administrator			Community Development Department-Planning Division

Table 1 – Responsible Agencies

Narrative

-

Consolidated Plan Public Contact Information

Joseph M. Murphy
Director of Planning
Community Development Department
City of Royal Oak, Michigan
203 S Troy Street
P (248) 246-3285
E joem@romi.gov

AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

The Planning Division of the City of Royal Oak's Community Development Department, in cooperation with other government, non-profit and private agencies, Oakland County HOME Consortium members, and Oakland County's Continuum of Care (CoC), have developed the Five-Year Consolidated Plan and this Annual Action Plan. The consultation included presentations to the Royal Oak City Commission and the Royal Oak Rehabilitation Board of Appeals, public hearings, meetings, and direct mailers to those agencies. A wide array of agencies, groups, and organizations were provided the opportunity to participate in the local process. The HOME Consortium members, with Oakland County as the lead agency, meet on an as-needed basis.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).

The response shall be provided by Oakland County in its role as the lead entity for the Oakland County HOME Consortium.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The Alliance for Housing of Oakland County is the Continuum of Care (CoC) for Oakland County. It is a 501(c)(3), non-profit organization that is a diverse, collaborative group of partners and individuals all working toward a common goal to end homelessness and increase affordable housing opportunities in Oakland County. The Alliance is made up of a number of organizations from the private and public sectors, and includes entities such as emergency shelters, warming centers, providers of health services including mental health services, providers of services to people with development disabilities, for-profit and not for-profit organizations.

City staff participates in the annual January Point-In-Time (PIT) Count of homeless individuals which is coordinated by the CoC. In January 2023, the City of Royal Oak provide City Hall as a gathering place for volunteers to meet and deploy to known unsheltered "hot spots" in south Oakland County efforts. This was a time for staff to meet, discuss and learn of local efforts with a wide variety of service agencies that assist the homeless.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate

outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The Alliance for Housing of Oakland County is the Continuum of Care (CoC) for Oakland County. It is a 501(c)(3), non-profit organization that is a diverse, collaborative group of partners and individuals all working toward a common goal to end homelessness and increase affordable housing opportunities in Oakland County. The Alliance is made up of a number of organizations from the private and public sectors, and includes entities such as emergency shelters, warming centers, providers of health services including mental health services, providers of services to people with development disabilities, for-profit and not for-profit organizations.

City staff participates in the annual January Point-In-Time (PIT) Count of homeless individuals which is coordinated by the CoC. In January 2023, the City of Royal Oak provided City Hall as a gathering place for volunteers to meet and deploy to known unsheltered "hot spots" in south Oakland County. This was a time for staff to meet, discuss, and learn of local efforts with a wide variety of service agencies that assist the homeless.

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	South Oakland Shelter
	Agency/Group/Organization Type	Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Pursuant to the Federal requirement in 24 CFR Part 91.100(a)(2), when preparing the portions of this plan describing the city's / consortium's homeless strategy and the resources available to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) and persons at risk of homelessness, the city must consult with: (ii) Public and private agencies that address housing, health, social services, victim services, employment, or education needs of low-income individuals and families; homeless individuals and families, including homeless veterans; youth; and/or other persons with special needs. There was no anticipated outcome prior to the invitation to participate. The participation helps identify the service needs of their clients.
2	Agency/Group/Organization	Alliance for Housing Oakland County Continuum of Care
	Agency/Group/Organization Type	Publicly Funded Institution/System of Care

What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Pursuant to the Federal requirement in 24 CFR Part 91.100(a)(2), when preparing the portions of this plan describing the city's / consortium's homeless strategy and the resources available to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) and persons at risk of homelessness, the city must consult with: (ii) Public and private agencies that address housing, health, social services, victim services, employment, or education needs of low-income individuals and families; homeless individuals and families, including homeless veterans; youth; and/or other persons with special needs. There was no anticipated outcome prior to the invitation to participate. The participation helps identify the service needs of their clients.

Identify any Agency Types not consulted and provide rationale for not consulting

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care		

Table 3 - Other local / regional / federal planning efforts

Narrative

AP-12 Participation - 91.401, 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

While the city provided the opportunity for public participation during the development of the PY2024 Annual Action Plan, the city's goals have already been established in the Strategic Plan portion of the Five-Year Consolidated Plan. Any public comment during the development of the PY2024 Annual Action Plan would not have modified the goals. It would however direct the Royal Oak City Commission toward activities and funding levels for PY2024.

The Royal Oak Rehabilitation Board of Appeals held public hearings at their September 26, 2023 meeting. The Royal Oak City Commission held a public hearing at their May 13, 2024 meeting. Notice regarding the public hearings was published in The Daily Tribune, a local newspaper, and to the CDBG webpage of the city's website. Availability of the draft CDBG PY2024 Annual Action Plan was published in The Daily Tribune, a local newspaper. Notice of the 30-day comment period was published in The Daily Tribune on April 26, 2024. No written public comments were received.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Non-targeted/broad community	Not applicable. None provided.	Not applicable. None provided.	Not applicable.	https://romi.gov/AgendaCenter/ViewFile/Agenda/_09262023-2926

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Newspaper Ad	Non-targeted/broad community	Not applicable. None provided.	Not applicable. None provided.	Not applicable.	https://romi.gov/272/Public-Notices
3	Public Hearing	Non-targeted/broad community				
4	30 day comment period	Non-targeted/broad community				https://romi.gov/272/Public-Notices

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

Introduction

As of April 19, 2024, HUD has not yet informed the City of Royal Oak of its PY2024 entitlement grant allocation dollar amount. The annual allocation amount shown below is based on the dollar amount receipted in PY2023.

Anticipated Resources

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	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,179,934	255,000	189,200	1,624,134	1,180,079	The City of Royal Oak will receive \$1,179,934 of CDBG funds for PY2024 (July 1, 2024 - June 30, 2025).

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

To receive CDBG funds from the City of Royal Oak, local organizations / agencies must provide an application and supplemental information detailing their funding sources and leverage opportunities for specific activities. The city does not require "matching" non-CDBG or federal funds. The Royal Oak City Commission will weigh the value of proposed activities in light of the goals in the consolidated plan and the likelihood that the activity would be implemented without the presence of CDBG funds. Subrecipient activities that would be implemented regardless of the city's CDBG funds stand a greater likelihood of not being funded. Many of the public service subrecipients leverage a wide variety of funding sources. This is a standard practice. These organizations will not be penalized for this practice.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

None has been identified at this time.

Discussion

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Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Facilitate Access To Public Services	2021	2025	Non-Homeless Special Needs		in-home services: seniors, frail elderly& disabled eviction prevention	CDBG: \$90,000	Public service activities for Low/Moderate Income Housing Benefit: 100 Households Assisted Homelessness Prevention: 25 Persons Assisted
2	Improve Exist. Single-Family Homes & Affordability	2021	2025	Affordable Housing		housing rehab; single-family, owner-occupied	CDBG: \$602,000	Homeowner Housing Rehabilitated: 15 Household Housing Unit
3	Improve Public Facilities & Infrastructure	2021	2025	Non-Housing Community Development		improve parks & recreational facilities	CDBG: \$600,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 355 Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Facilitate Access To Public Services
	Goal Description	proposed \$35,000 - R.O.S.E.S. in-home supportive services \$55,000 - LADA homeless / eviction prevention
2	Goal Name	Improve Exist. Single-Family Homes & Affordability
	Goal Description	proposed \$602,000 owner-occupied, single-family housing rehabilitation program
3	Goal Name	Improve Public Facilities & Infrastructure
	Goal Description	proposed \$600,000 Clawson Park improvements: Tract 1837, Block Group 5

AP-35 Projects - 91.420, 91.220(d)

Introduction

At its May 13, 2024 meetings, the Royal Oak City Commission held a public hearing on the draft PY2024 Annual Action Plan. After the public hearing, the commission deliberated on the recommended activities and funding levels. The city commission adopted a motion incorporating the following activities and funding levels into the PY202 Annual Action Plan.

#	Project Name
1	in-home supportive services - ROSES
2	homeless prevention & assistance services - LADA
3	housing rehabilitation program - owner rehabilitation assistance
4	Clawson Park improvements
5	program administration

Table 7 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The allocation priorities address the needs in the Consolidated Plan. There are no known obstacles to addressing underserved needs.

AP-38 Project Summary
Project Summary Information

1	Project Name	in-home supportive services - ROSES
	Target Area	
	Goals Supported	Facilitate Access To Public Services
	Needs Addressed	in-home services: seniors, frail elderly& disabled
	Funding	CDBG: \$35,000
	Description	CDBG funds will be expended on supportive services for elderly, income qualified Royal Oak residents. The Royal Oak Senior Essential Services (R.O.S.E.S.) program is organized by staff at the City-owned senior center. Contracted workers perform subsidized home chores, minor repairs, and personal care assistance for income qualified residents. Home chores include household tasks such as snow shoveling, lawn mowing, yard work, etc. Home repairs, which do not require a licensed contractor, include minor plumbing, carpentry, and electrical work. Personal care may include assistance with activities of daily living.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	CDBG funds will be expended on supportive services for approximately 120 elderly, income qualified Royal Oak residents. The Royal Oak Senior Essential Services (R.O.S.E.S.) program is organized by staff at the city-owned senior center. Contracted workers perform subsidized home chores, minor repairs, and personal care assistance for income qualified residents. Home chores include household tasks such as snow shoveling, lawn mowing, yard work, etc. Home repairs, which do not require a licensed contractor, include minor plumbing, carpentry, and electrical work. Personal care may include assistance with activities of daily living.
	Location Description	At individual residences.
2	Planned Activities	Home chores include household tasks such as cleaning, snow shoveling, lawn mowing, yard work, etc. Home repairs, which do not require a licensed contractors, include minor plumbing, carpentry, and electrical work. Personal care may include assistance with activities of daily living.
	Project Name	homeless prevention & assistance services - LADA
	Target Area	
	Goals Supported	Facilitate Access To Public Services
	Needs Addressed	eviction prevention
	Funding	CDBG: \$55,000

	Description	CDBG funds would reimburse Legal Aid & Defender Association (LADA) for services provided to Royal Oak residents at-risk of becoming homeless. LADA may provide eligible rental households with no greater than 3 months of rent arrear payments or utility payments to avoid eviction or disconnection of utilities. These services address the priority need to address housing affordability needs of low- to moderate-income renter-occupied households. It also addresses the need to support and facilitate access to the wide variety of existing public services that may enhance life skills and self-sufficiency for those on the verge of experiencing homelessness.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	25 low- to moderate-income households
	Location Description	available city-wide
	Planned Activities	LADA may provide rental assistance to eligible low- to moderate-income households. It will provide financial assistance for no greater than 3 months of rent arrear payments or utility payments to avoid eviction or disconnection of utilities. These services address the priority need to address housing affordability needs of low- to moderate-income renter-occupied households.
3	Project Name	housing rehabilitation program - owner rehabilitation assistance
	Target Area	
	Goals Supported	Improve Exist. Single-Family Homes & Affordability
	Needs Addressed	housing rehab; single-family, owner-occupied
	Funding	CDBG: \$602,000

	Description	A city administered program to provide technical and financial assistance to low- and moderate-income residents of the city to rehabilitate owner-occupied single family houses on a city-wide basis. Approximately \$450,000 shall be available for no interest, low interest, and forgivable loans and the remainder for program administration activities including wages, insurance, benefits, certifications, lead-based paint assessments and clearance exams, audit services, advertising, etc. The activity addresses the priority need to rehabilitate owner-occupied single-family dwellings with the overall goal of improving the City's existing housing stock and allow low- to moderate-income homeowners to conduct needed rehabilitation activities in an affordable manner.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	15 low- to moderate-income households
	Location Description	city-wide
	Planned Activities	A city administered program to provide technical and financial assistance to low- and moderate-income residents of the City to rehabilitate owner-occupied single-family houses on a City-wide basis.
4	Project Name	Clawson Park improvements
	Target Area	
	Goals Supported	Improve Public Facilities & Infrastructure
	Needs Addressed	improve parks & recreational facilities
	Funding	CDBG: \$600,000
	Description	Improvements may include a new baseball field with related backstop, fencing, benches and bleachers, new fall zone material beneath some existing play equipment, new swings and related fall zone material, an adjacent play sand box, sidewalks/walking trail, bike racks, benches, trees, shade sail structure, trees and landscaping, drainage improvements, possible parking along the north side of the park in the Essex Rd. right-of-way. The city's Parks and Recreation Advisory Board will continue to provide input on the park design.
	Target Date	6/30/2025

	Estimate the number and type of families that will benefit from the proposed activities	According to HUD's most recent data, 355 low- to moderate-income persons live in Census Tract 1837, Block Group 5
	Location Description	Clawson Park is located in Census Tract 1837, Block Group 5
	Planned Activities	Improvements may include a new baseball field with related backstop, fencing, benches and bleachers, new fall zone material beneath some existing play equipment, new swings and related fall zone material, an adjacent play sand box, sidewalks/walking trail, bike racks, benches, trees, shade sail structure, trees and landscaping, drainage improvements, possible parking along the north side of the park in the Essex Rd. right-of-way. The city's Parks and Recreation Advisory Board will continue to provide input on the park design.
5	Project Name	program administration
	Target Area	
	Goals Supported	
	Needs Addressed	fair housing education & testing
	Funding	CDBG: \$217,958
	Description	Program administration funds (wages, benefits, insurance, independent auditor, training, legal fees, notices, mailings, etc.) continue to allow the proper oversight of projects and compliance with HUD regulations. These funds also allow the city to enter into contract with the Fair Housing Center of Metro. Detroit for fair housing testing services.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	-
	Location Description	-
	Planned Activities	Program administration funds (wages, benefits, insurance, independent auditor, training, legal fees, notices, mailings, etc.) continue to allow the proper oversight of projects and compliance with HUD regulations. These funds also allow the city to enter into contract with the Fair Housing Center of Metro. Detroit for fair housing testing services.

AP-50 Geographic Distribution - 91.420, 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

No geographic areas identified.

Geographic Distribution

Target Area	Percentage of Funds

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

-

Discussion

-

AP-75 Barriers to affordable housing -91.420, 91.220(j)

Introduction

While changes to development codes, such as provisions in the City's Zoning Ordinance, may help increase the supply of housing, there is no assurance it will translate to affordability.

Actions it planned 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

The City of Royal Oak is in the process of developing a new Master Plan. Key emerging topics include "providing more housing options" & "housing affordability". A full draft copy will be available in the May of 2024. Once the Master Plan is adopted, the City must take measures to implement the new policies and goals. Those actions include amending or creating a new Zoning Ordinance and/or development codes. New Zoning Ordinance provisions may facilitate more housing options. Those actions will be identified in future Annual Action Plans and year-end reports (CAPER).

Discussion

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AP-85 Other Actions - 91.420, 91.220(k)

Introduction

The City of Royal Oak will engage in a wide variety of activities intended to address the identified needs in the CDBG Strategic Plan.

Actions planned to address obstacles to meeting underserved needs

The underserved may include special need individuals, minority concentrations, those experiencing homelessness or those at-risk of becoming homeless, victims of domestic violence or sexual assault, returning veterans, the frail and elderly, large families, etc. The City may allocate CDBG funds to its at home senior assistance program (ROSES). CDBG funds may be provided to Legal Aid & Defender Association to assist those at-risk of becoming homeless. The City's CDBG-funded housing rehabilitation program may provide a direct mailer about the availability of the program to all single-family homeowners within the census tract with the highest percentage of minor homeowners. The City may continue to work with the local CoC to utilize the City Hall as a deployment center for volunteers and PIT County coordinators in January 2025. The City may retain the services of the Fair Housing Center of Metro. Detroit to conducting fair housing testing with the goal of ensuring the underserved's access to fair housing.

Actions planned to foster and maintain affordable housing

The City plans to preserve and increase the supply of affordable owner-occupied and renter-occupied housing for low- to moderate-income residents through CDBG-funded housing rehabilitation and new construction, advocacy, policies, and regulations. The housing rehabilitation program offers low and no interest loans and forgivable loans for renovations to existing single-family houses occupied by low- to moderate-income persons. These low or no cost financial options make it more affordable for homeowners to protect their investment and maintain affordable living conditions. Additionally, the City participates in the Oakland County HOME Consortium. The Consortium has greater direction on how its proportional HOME funds are expended on projects within Oakland County versus the state administered program which invested our proportional funds state-wide. The HOME program has shifted focus to rental assistance. The HOME program funds also provide gap financing for newly acquired and constructed or rehabilitation or preservation of affordable multiple-family rental housing with Oakland County. The City also maintains communication with the newly formed Oakland County Housing Trust Fund. In the Spring of 2024, certain City representatives contacted the Trust Fund Manager and County level elected officials to discuss a potential financial contribution to the trust fund in hopes of leveraging funding availability for new affordable housing developments within the City.

As of the Spring of 2024, the City is still in the process of developing a new Master Plan with keen focus on housing options and affordability.

In light of the timeframe to accomplish a new land use Master Plan and subsequent development regulations, the Royal Oak City Commission adopted community benefits guidelines in the Fall of 2022. The guidelines serve as a statement of development principles to encourage attainable housing, environmental sustainability, etc. Developers selecting the Planned Unit Development (PUD) process must demonstrate such principles in their development to receive approvals. Recent PUD developments were approved with assurance of a creating a modest number of new affordable housing units.

In February of 2023, the Royal Oak City Commission also allocated \$1,950,000 of its ARPA funds to the development of new affordable housing. Since then staff has meet with over a dozen developers regarding the possibility of leveraging the city's ARPA funds to construct a new affordable housing development.

Actions planned to reduce lead-based paint hazards

The City operates a CDBG-funded housing rehabilitation program (owner-occupied single-family dwellings). The program has specific procedures which outline the steps required to educate, test, contain and/or remediate LBP. All 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 prospective participants in the housing rehabilitation program, regardless of age of the structure. If the structure was built before 1978, a LBP risk assessment is conducted. The results are provided to the applicant. The finds are incorporated into the specifications for the rehabilitation work. All of the contractors participating in the City's housing rehabilitation program must present and maintain status as a LBP certified contractor. The risk assessment determines the degree of rehabilitation work needed to gain compliance with Federal LBP regulations and provide LBP-free living environment to all homeowners. Occupants may not be present during any site work. Once the contractor has completed all site work, a LBP clearance test is conducted. The results of the clearance test are provided to the homeowner. No occupant may return to the dwelling unit until the site gains clearance. All public service subreceptients that provide housing assistance in any manner must verify that the associated housing unit has been inspected and meets HUD's minimum required Housing Quality Standards (HQS). inspection, requirements including the provisions regarding LBP. Any dwelling unit that does not meet HUD's HQS standards must be brought into compliance. These actions educate the public of the danger of LBP, ensure compliance with Federal regulations to address the presence of LBP, and provide a LBP free living environment for all occupants upon completion of all site work.

Actions planned to reduce the number of poverty-level families

The City plans to fund LADA's eviction prevention services. This allows poverty-level families with "housing first" so they may also gains access to a wide variety of supportive services toward returning to self-sufficiency. The City also plans to fund its housing rehabilitation program. The City believes poverty-level families will financially and emotionally benefit greatly from livable single-family homes. A stable living arrangement can lead to great economic stability and upward economic mobility. The City actively

seeks Section 3 (low-income residents or businesses) in every Section 3 eligible CDBG-funded project. The selection of Section 3 firms provides economic gain to poverty-level families.

Actions planned to develop institutional structure

The City relies on existing agencies to assist its residents with access to a wide variety of public services. As applicable, all of the City's CDBG subrecipients are required utilize HMIS. This creates a seamless information system to assist clients in need that may utilize different agencies for different services. The information system helps reduce redundant institutional efforts and keep clients on track with their own case management efforts.

Actions planned to enhance coordination between public and private housing and social service agencies

The City's continued participation in the Oakland County HOME Consortium greatly strengthens its knowledge of and access to the Continuum of Care, other HUD-funded levels of government within Oakland County, and a broader network of social service agencies. Regular meetings and networking strengthen our knowledge of the local needs and the institutional structure to deliver results.

Discussion

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Program Specific Requirements

AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

Introduction

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Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

Discussion

PY2024 is the fourth year of the 5-year Consolidated Plan cycle.

To calculate the PY2024 Annual Action Plan overall benefit percentage, the following will be the three year certification period: PY2023, PY2024, PY2025


Attachments

Grantee SF-424's and Certification(s)

OMB Number: 4040-0004
Expiration Date: 11/30/2025

Application for Federal Assistance SF-424		
<div> <div> * 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application </div> <div> * 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision </div> <div> * If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/> </div> </div>		
* 3. Date Received: <input type="text"/>		* 4. Applicant Identifier: <input type="text"/>
5a. Federal Entity Identifier: <input type="text"/>		5b. Federal Award Identifier: <input type="text" value="B-24-HL-26-3011"/>
State Use Only:		
6. Date Received by State: <input type="text"/>		7. State Application Identifier: <input type="text"/>
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="City of Royal Oak, Michigan"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="38-0904646"/>		* c. UEI: <input type="text" value="U15N735K3R05"/>
d. Address:		
* Street1:	<input type="text" value="203 S Troy Street"/>	
* Street2:	<input type="text"/>	
* City:	<input type="text" value="Royal Oak"/>	
* County/Parish:	<input type="text"/>	
* State:	<input type="text" value="MI: Michigan"/>	
* Province:	<input type="text"/>	
* Country:	<input type="text" value="USA: UNITED STATES"/>	
* Zip / Postal Code:	<input type="text" value="48067-2760"/>	
e. Organizational Unit:		
Department Name: <input type="text" value="Community Development Depart."/>		Division Name: <input type="text" value="Planning Division"/>
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix:	<input type="text" value="Mr."/>	* First Name: <input type="text" value="Joseph"/>
Middle Name:	<input type="text" value="W."/>	
* Last Name:	<input type="text" value="Marshey"/>	
Suffix:	<input type="text"/>	
Title:	<input type="text" value="Director of Planning"/>	
Organizational Affiliation: <input type="text" value="City of Royal Oak, Michigan"/>		
* Telephone Number:	<input type="text" value="(248) 246-2205"/>	Fax Number: <input type="text" value="(248) 246-3005"/>
* Email:	<input type="text" value="joseph@rmr1.gov"/>	

Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="City or Township Government"/>	
Type of Applicant 2: Select Applicant Type: <input type="text"/>	
Type of Applicant 3: Select Applicant Type: <input type="text"/>	
* Other (specify): <input type="text"/>	
* 10. Name of Federal Agency: <input type="text" value="US Department of Housing & Urban Development"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text" value="14.219"/>	
CFDA Title: <input type="text" value="Entitlement Grant"/>	
* 12. Funding Opportunity Number: <input type="text" value="6-24-HC-25-0011"/>	
* Title: <input type="text" value="Community Development Block Grant (CDBG)"/>	
13. Competition Identification Number: <input type="text"/>	
Title: <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
* 15. Descriptive Title of Applicant's Project: <input type="text" value="Community Development Block Grant (CDBG)"/>	
Attach supporting documents as specified in agency instructions. <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: <input type="text" value="12"/>	* b. Program/Project: <input type="text" value="12"/>
Attach an additional list of Program/Project Congressional Districts if needed. <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
* a. Start Date: <input type="text" value="07/01/2024"/>	* b. End Date: <input type="text" value="06/30/2025"/>
18. Estimated Funding (\$):	
* a. Federal	<input type="text" value="1,179,634.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="109,200.00"/>
* f. Program Income	<input type="text" value="255,000.00"/>
* g. TOTAL	<input type="text" value="1,524,134.00"/>
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process? <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> . <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes," provide explanation and attach <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. "By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001) <input checked="" type="checkbox"/> ** I AGREE ** The list of certifications and assurances, or an internal site where you may obtain this list, is contained in the announcement or agency specific instructions.	
Authorized Representative:	
Prefix: <input type="text" value="Mr."/> * First Name: <input type="text" value="Michael"/> Middle Name: <input type="text" value="C"/> Last Name: <input type="text" value="Houglum"/> Suffix: <input type="text"/>	
* Title: <input type="text" value="Mayor"/>	
* Telephone Number: <input type="text" value="(248) 246-3265"/>	* Fax Number: <input type="text" value="(248) 246-3905"/>
* Email: <input type="text" value="m.houglum@sonic.gov"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="05/15/2024"/>

CERTIFICATIONS

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

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

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

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-L.L.I., "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

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

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

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


Signature of Authorized Official

MAYOR
Title

MAY 15, 2024
Date

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

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

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

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

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2023 2024 2025 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

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

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

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

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

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, I, K and R.

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



Signature of Authorized Official

MAY 15, 2014
Date

MAYOR

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4043-0009
Expiration Date: 02/28/2025

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

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

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

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

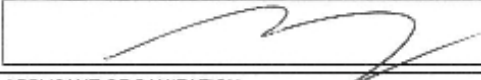
1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-618), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11700; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§489a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Royal Oak, Michigan	MAY 15, 2024

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ASSURANCES - NON-CONSTRUCTION PROGRAMS

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

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

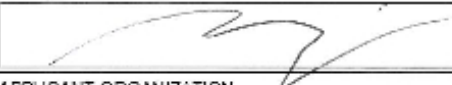
1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1506 and 7324-7329) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

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Prescribed by OMB Circular A-102

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Royal Oak, Michigan	MAY 15, 2024

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