

# Covid -19 Amendments



## **INTRODUCTION**

The Charter Township of Canton, MI has completed the planning process for the 2016/2017-2020/2021 Five-Year Consolidated Plan (Consolidated Plan) as required by the U.S. Department of Housing and Urban Development (HUD). The purpose of the Consolidated Plan is to identify goals, objectives and strategies for addressing housing and community development needs, including those of the homeless and other special needs populations.

On April 3, 2020, Congress announced the *Coronavirus Aid, Relief and Economic Security Act (CARES Act)* and provided funding of \$215,200 to Canton Township in supplemental CDBG funding to prevent, prepare for and respond to the coronavirus.

The Department of Housing and Urban Development (HUD) is requiring every grantee to amend their 5 Year Consolidated Plan, their Annual Action Plan and their Citizen Participation Plan. The amendments to each plan and or policy are provided and we welcome all citizen comments.

Comments can be addressed to "CDBG - CARES ACT Amendments" Finance Dept, 1150 Canton Center Rd, Canton MI 48188 or by email to: [mike.sheppard@canton-mi.org](mailto:mike.sheppard@canton-mi.org)

# COVID -19/ CARES ACT AMENDMENT

## *SP-25 Priority Needs*

The Five-Year Consolidated Plan must indicate the general priorities for allocating investment of available resources among different needs. Priority needs are those that will be addressed by the goals outlined in the Strategic Plan. For each priority, Canton Township has indicated one or more populations to be served, as well as an assigned priority level indicating relative importance among the needs listed (see **Table 50**).

**TABLE 50: PRIORITY NEEDS SUMMARY**

Priority Need Name	Priority Level	Population	Geographic Areas	Goals Addressing
Housing Rehabilitation	High	Low/Moderate Income and Special Needs	Township-wide and Target Areas	Housing
Elimination of Slum and Blight	High	Low/Moderate Income	Township-wide and Target Areas	Community and Economic Development
Code Enforcement	Low	Low/Moderate Income	Township-wide and Target Areas	Community and Economic Development
Increased Homeownership Opportunities	High	Low/Moderate Income and Special Needs	Township-wide and Target Areas	Housing/Non-Homeless Special Needs
Affordable and Accessible Housing for Special Needs	High	Special Needs	Township-wide and Target Areas	Housing/Non-Homeless Special Needs
Homeless Services and Prevention	Low	Homeless	Township-wide and Target Areas	Homelessness
Public Facilities and Infrastructure	High	Low/Moderate Income	Township-wide and Target Areas	Community and Economic Development
Economic Development Opportunities	High	Low/Moderate Income	Township-wide and Target Areas	Community and Economic Development
Youth Programs and Services	High	Low/Moderate Income	Township-wide and Target Areas	Community and Economic Development
Programs and services for low and moderate income residents	High	Low/Moderate Income	Township-wide and Target Areas	Housing/ Community and Economic Development
Social Service Programs	High	Low/Moderate Income	Township-wide and Target Areas	Community and Economic Development
Programs and services for special needs residents	High	Special Needs	Township-wide and Target Areas	Housing/Non-Homeless Special Needs
ADA Accessibility at Township Facilities and Parks	High	Special Needs	Township-wide and Target Areas	Non-Homeless Special Needs
Transportation Options	High	Low/Moderate Income and Special Needs	Township-wide and Target Areas	Community and Economic Development
Historic Preservation	High	Township Residents	Township-wide and Target Areas	Community and Economic Development

**Table 50 – Priority Needs Summary**

Amended Need (5/14/2020)

Covid-19 Emergency Activities

High

Township Residents

Township-wide

Homelessness and Community Development

**CANTON CHARTER TOWNSHIP  
PY 2019 CDBG ANNUAL ACTION PLAN  
CDBG-CV (Coronavirus) FUNDING \$215,200  
(AMENDED PLAN 4/28/2020)  
CDBG-CV PROJECT DESCRIPTIONS**

**SUBSISTENCE PAYMENTS - \$178,680**

One-time or short-term (no more than three months) emergency payments on behalf of individuals or families, generally for the purpose of preventing homelessness. Examples include utility payments to prevent cutoff of service, and rent/mortgage payments to prevent eviction.

Eligible Activity: 570.201 – (e) Public Services (05Q) 570.207(b)(4)

National Objective: Urgent Need (URG) – §570.208:

(c) *Activities designed to meet community development needs having a particular urgency.* In the absence of substantial evidence to the contrary, an activity will be considered to address this objective if the recipient certifies that the activity is designed to alleviate existing conditions which pose a serious and immediate threat to the health or welfare of the community which are of recent origin or which recently became urgent, that the recipient is unable to finance the activity on its own, and that other sources of funding are not available. A condition will generally be considered to be of recent origin if it developed or became critical within 18 months preceding the certification by the recipient.

**CANTON MEALS CONNECTION PROGRAM - \$10,000.**

Costs associated with the operation of food banks, community kitchens, and food pantries, such as staff costs, supplies, utilities, maintenance, and insurance.

Eligible Activity: 570.201 – (e) Public Services. Food Banks (05W)

National Objective: Urgent Need (URG) – §570.208:

(c) *Activities designed to meet community development needs having a particular urgency.* In the absence of substantial evidence to the contrary, an activity will be considered to address this objective if the recipient certifies that the activity is designed to alleviate existing conditions which pose a serious and immediate threat to the health or welfare of the community which are of recent origin or which recently became urgent, that the recipient is unable to finance the activity on its own, and that other sources of funding are not available. A condition will generally be considered to be of recent origin if it developed or became critical within 18 months preceding the certification by the recipient.

**CANTON COVID-19 TESTING PROGRAM - \$5,000.**

This activity provides funding for testing, diagnosis or other services at a fixed or mobile location. Services addressing the physical health needs of the residents of the community.

Eligible Activity: 570.201 – (e) Public Services. Health Services (05M)

National Objective: Urgent Need (URG) – §570.208:

(c) *Activities designed to meet community development needs having a particular urgency.* In the absence of substantial evidence to the contrary, an activity will be considered to address this objective if the recipient certifies that the activity is designed to alleviate existing conditions which pose a serious and immediate threat to the health or welfare of the community which are

of recent origin or which recently became urgent, that the recipient is unable to finance the activity on its own, and that other sources of funding are not available. A condition will generally be considered to be of recent origin if it developed or became critical within 18 months preceding the certification by the recipient.

**PROGRAM ADMINISTRATION - \$21,520.**

These funds are used to reimburse the cost of administering the CDBG-CV program.

Eligible Activity: 570.206 –Program Administrative Costs

National Objective: Urgent Need (URG) – §570.208:

*(c) Activities designed to meet community development needs having a particular urgency.* In the absence of substantial evidence to the contrary, an activity will be considered to address this objective if the recipient certifies that the activity is designed to alleviate existing conditions which pose a serious and immediate threat to the health or welfare of the community which are of recent origin or which recently became urgent, that the recipient is unable to finance the activity on its own, and that other sources of funding are not available. A condition will generally be considered to be of recent origin if it developed or became critical within 18 months preceding the certification by the recipient.

**1) PURPOSE:**

- a) To establish procedures for increasing citizen participation levels.
- b) Increase citizen participation in planning, prioritizing, and performance review of the Community Development Block Grant Program. Provide low/moderate income families, minority groups, and handicapped persons an opportunity to present comments, review proposals, and participate in the process of planning the expenditure of CDBG funds

**2) COMPLIANCE:**

Fulfill the requirements of the Community Development Regulations under Section 570.301 and 570.303 specifying adoption of a formalized Citizen Participation Plan; as amended by the September 1983 HUD Rules and Regulations; the 1987 Housing and Community Development Act Section 104(A)(3); the National Affordable Housing Act of 1990; and Part 91 Consolidated Submissions for Community Planning and Development (24 CFR Sec 91.105).

**3) PROCEDURE:**

**EFFECTIVE DATE**

The effective date of this plan is May 31, 2017.

**CITIZEN PARTICIPATION**

(A) Community Development Block Grant Advisory Council. The Council is appointed by the Township Supervisor with the concurrence of the Board of Trustees. There are seven members who serve two-year terms, ending on December 31. Members must be residents of Canton. The duties of the Council include the following.

- (1) Conduct public hearings on the CDBG program.

- (2) Make recommendations to the Board of Trustees on the CDBG program. Recommendations are by majority vote.
  - (3) Review all citizen comments made at the Advisory Council meetings.
  - (4) Evaluate comments, recommendations, and new program proposals from individuals, non-profit organizations, Administration, and Staff. Meet on a monthly basis or as needed to conduct the business of the CDBG program.
  - (5) Provide resident input on needs and priorities.
  - (6) Assist in recommending and amending written policies of the CDBG program.
  - (7) Review as appropriate any written comments to the Council in regards to the expenditure of CDBG funds. The Finance and Budget Department will provide a written response within 15 working days of the Council's decision.
- (B) Consolidated Plan. There shall be two public hearings and a 30-day public comment period. The first public hearing shall be before the CDBG Advisory Council to hear project proposals and make project selection and funding recommendations. The second shall be before the Board of Trustees to adopt, reject or modify Advisory Council recommendations. There shall be a legal notice published before the public hearings. Before adoption of the Consolidated Plan, information will be made available to citizens, public agencies, and other interested parties that includes the funding amount anticipated and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income.
- (C) Consolidated Plan Amendment. There shall be one public hearing before the ~~CDBG Advisory Council~~ Board of Trustees and a ~~30~~ 5-day public comment period. There shall be a legal notice published before the public hearing. A Consolidated Plan Amendment shall be required when there is the addition of an activity, change in location of an activity, or a change in the funding amount greater than 25% of its total yearly allocation.
- (D) Performance Report. There shall be one public hearing before the CDBG Advisory Council and a 15-day public comment period. All citizen comments and a summary of actions taken in response to the comments will be included in the performance report submitted to HUD. There shall be a legal notice published before the public hearing.

(E) Legal Notice. Public hearing and other notices shall be published in the official legal newspaper no later than ~~10~~ 5 calendar days prior to the hearing date. Public hearing notices shall be published ~~ten~~ five or more days before any public hearing. In addition, public hearing notices shall be posted on the Canton Township website.

(F) Public Hearings. Citizens will be encouraged to make comments on proposed CDBG projects and program amendments at the public hearings. The role of citizens at the public hearings is:

- (1) To comment on proposals. To discuss concerns regarding CDBG projects.
- (2) To suggest solutions for funding or solving CDBG problems.
- (3) To interact with Staff in the implementation of plans and projects.
- (4) To express funding and assistance priorities.

Due to the COVID-19 pandemic, all township offices are closed. Public hearings shall be held ~~on~~ by video teleconference. Electronic Public Meeting Access will be provided. Public comments may be submitted to [Michael.siegrist@canton-mi.org](mailto:Michael.siegrist@canton-mi.org) at any time prior to the meeting. Members of the public who attend by telephone or video may address the Board during the public comment period via videoconference. Township facilities during or within three hours after regular business hours and in facilities accessible to persons with disabilities. Non-English speaking residents will be provided with an interpreter if significant numbers of non-English speaking residents can be reasonably expected to participate. After the public hearings, Staff will review the citizen comments. Comments that require written responses will answered within 15 working days of the public hearing. All citizen comments will be maintained on file and shall be part of the public record.

(G) Copies of Documents. Copies of public documents pertaining to the CDBG program will be available for public inspection in the Finance and Budget Department. A 24-hour notice may be specified for some documents. In addition, copies of documents shall be made available on the Canton Township website.

Publication. The proposed Consolidated Plan shall be published and made available to citizens in the Finance and Budget Department. A summary of the proposed plan shall be

- (H) published in the legal newspaper. The summary shall describe the contents and purpose of the proposed plan and indicate where the entire plan document is available for examination. A reasonable number of free copies of the plan shall be provided to citizens and groups requesting it.
- (I) Technical Assistance. Technical assistance will be provided on an as-needed basis at the
- (J) Finance and Budget Division. Assistance will be provided to advise citizen organizations on the best method of presenting funding concepts to the CDBG Advisory Council; develop project proposals; assess problems that may occur; and provide information and referral.
- (K) Complaints. Citizens may make complaints at any public hearing or prepare written complaints about the consolidated plan, amendments, and performance report and submit them to the Finance and Budget Department. Written complaints will be answered in writing within 15 working days of the receipt of the complaint; otherwise an explanation will be provided within the time limit stating the reason for the delay and what date an answer will be provided.
- (L) Displacement. The Charter Township of Canton shall minimize the displacement of persons in performance of the Consolidated Plan, and shall assist any person displaced in accordance with Section 104(d) of the Housing and Community Development Act of 1974 and in consultation with HUD. This policy shall be stated in the annual published summary of the Consolidated Plan.