



COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) APPLICATION

SUBMISSION DEADLINE IS 09/17/2025 at 11:59:59 pm EST

Units of General Local Government (UGLG) must complete the CDBG Application the appropriate activity specific supplements in their entirety and submit them with the required attachments.

A	APPLICANT INFORMATION	
1	APPLICANT (UGLG) NAME	Lenawee County
2	ADDRESS, CITY, STATE, ZIP	301 N. Main Adrian, MI 49221
3	FEDERAL ID #	38-6005798
4	UNIQUE ENTITY IDENTIFIER (UEI) #	ZXB1UQJNUT73
5	MSHDA ORG #	797
6	FISCAL YEAR END (mm/dd)	12/31/2026
7	UGLG TYPE	<input checked="" type="checkbox"/> Unit of Government <input type="checkbox"/> Land Bank
8	UGLG CONTACT NAME	Francine Zysk
9	UGLG CONTACT EMAIL	Francine.zysk@lenawee.mi.us
10	UGLG CONTACT PHONE	517-264-4713

B	REGIONAL HOUSING
1	<p>Check the Housing Partnership Region your project is located in:</p> <p><input type="checkbox"/> A. Western Upper Peninsula - Baraga, Gogebic, Houghton, Iron, Keweenaw, Ontonagon</p> <p><input type="checkbox"/> B. Central Upper Peninsula - Alger, Delta, Dickinson, Marquette, Menominee, Schoolcraft</p> <p><input type="checkbox"/> C. Eastern Upper Peninsula - Chippewa, Luce, Mackinaw</p> <p><input type="checkbox"/> D. Northwest - Antrim, Benzie, Charlevoix, Emmet, Grand Traverse, Kalkaska, Leelanau, Manistee, Missaukee, Wexford</p> <p><input type="checkbox"/> E. Northeast - Alcona, Alpena, Cheboygan, Crawford, Iosco, Montmorency, Ogemaw, Oscoda, Otsego, Presque Isle, Roscommon</p> <p><input type="checkbox"/> F. West Michigan - Allegan, Barry, Ionia, Kent, Lake, Mason, Mecosta, Montcalm, Newaygo, Muskegon, Oceana, Osceola, Ottawa</p> <p><input type="checkbox"/> G. East Central Michigan - Arenac, Bay, Clare, Gladwin, Gratiot, Isabella, Midland, Saginaw</p> <p><input type="checkbox"/> H. East Michigan - Genesee, Huron, Lapeer, Sanilac, Shiawassee, St. Clair, Tuscola</p> <p><input type="checkbox"/> I. South Central - Clinton, Eaton, Ingham</p> <p><input type="checkbox"/> J. Southwest - Berrien, Branch, Calhoun, Cass, Kalamazoo, St. Joseph, Van Buren</p> <p><input checked="" type="checkbox"/> K. Southeast - Hillsdale, Jackson, Lenawee, Livingston, Monroe, Washtenaw</p>
2	<p>Within which County is the project located?</p> <p>Lenawee County</p>
3	<p>How does your project fit with the Regional Housing Plan goals? Indicate the Goal number (Regional Housing Plans can be accessed on the MSHDA website: Statewide Housing Plan.)</p>

	<p>Upgrading roofs, windows, and HVAC systems directly preserves existing housing, aligning with the statewide goal to rehabilitate and maintain quality stock. Our program supports contractors, nonprofits, and housing stakeholders which are key to strengthening the regional housing ecosystem. Our Homeowner Rehabilitation Program directly aligns with Region K—Regional Housing Plan (Southeast Michigan), specifically addressing:</p> <ul style="list-style-type: none"> • Goal 4.1, 4.4, and 4.6 (Access to stable and affordable quality housing for low-income households) by upgrading critical systems to preserve existing homes • The Regional Housing Ecosystem's goal of enhancing collaboration among stakeholders—including contractors, nonprofits, and agencies—by engaging local partners in implementing rehabilitation • Region K’s awareness and access objectives, by delivering visible improvements and building momentum for additional public engagement <p>These actions not only fulfill Region K’s identified priorities but also support key Statewide Housing Plan goals around preserving housing stock and strengthening the housing ecosystem.</p>
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<p>C</p>	<p>COMMUNITY DEVELOPMENT NARRATIVE</p> <p>Title I of the Federal Housing and Community Development Act of 1974, as amended, requires Units of General Local Government (UGLG) applying for funds to provide a brief narrative on how the proposed project aligns with or impacts their locally adopted plans.</p> <p>To satisfy this requirement, UGLGs must complete the questions in this section. Applicants may reference a locally adopted plan, such as a Master Plan or Community Improvement Plan; however, all questions must be answered. If the UGLG's locally adopted plan(s) do not specifically address the questions provided, supplemental information should be included to demonstrate how the proposed project fulfills the objectives of an existing plan.</p>
<p>1</p>	<p>Lenawee County continues to face a variety of community development and housing needs that impact both the overall population and, more acutely, low- and moderate-income (LMI) residents. These needs span affordable housing, infrastructure improvements, public facilities, and access to essential services. As presented in Lenawee County’s land use master plan, the result of the decreased PPH is that more housing is needed to house an equivalent number of people. For example, on average, in 2000 it took 80 additional dwelling units to house 1,000 people in Lenawee County than it did in 1970.</p> <p>Housing affordability and quality remain pressing issues throughout Lenawee County. According to recent data from the U.S. Census Bureau and HUD income limits, approximately 40% of households in Lenawee County qualify as low- to moderate-income. These residents often face challenges including:</p> <ul style="list-style-type: none"> • Lack of affordable rental units, particularly for households earning below 50% of Area Median Income (AMI). • Aging housing stock, with a significant portion of homes built before 1970. Many of these units require major repairs or rehabilitation to remain safe and habitable.

- Home repair and weatherization needs among elderly and fixed-income homeowners who cannot afford maintenance costs.
- Limited housing options for persons with disabilities and other special needs populations.
- Rising utility costs, which disproportionately impact low-income households and can contribute to housing instability.

Beyond housing, Lenawee County has identified the following priority community development needs:

- **Public Infrastructure Improvements:** Several areas, particularly in rural townships and unincorporated communities, lack adequate water, sewer, and drainage infrastructure. Aging systems in small communities are in need of upgrades to meet current safety and environmental standards.
- **Transportation Access:** Many low-income residents, especially seniors and individuals other abled (with disability), face barriers accessing employment, healthcare, and essential services due to limited public transportation options.
- **Blight Removal:** Vacant, abandoned, or deteriorating structures are present in both urban centers like Adrian and more rural areas. These structures depress surrounding property values and contribute to public safety issues.
- **Public Facilities and ADA Accessibility:** There is a need to improve and expand community centers, parks, and government buildings to ensure accessibility for all residents, including those with disabilities.
- **Access to Broadband and Digital Resources:** Internet access is limited in some rural parts of the county, affecting residents' ability to work, study, or access telehealth and government services.

Low- and moderate-income individuals are disproportionately affected by these challenges. They often live in areas with the greatest infrastructure deficiencies, are most affected by blight and housing quality issues, and have the least access to private transportation and digital resources. Many also lack the financial resources to address home repair needs or relocate to better housing conditions.

To address these issues, Lenawee County prioritizes targeted investments in infrastructure, housing rehabilitation, public facility improvements, and support for services that directly benefit LMI residents. CDBG funding is critical to meeting these community-identified needs and ensuring equitable opportunities for all residents.

Attached is the Lenawee County Community Development Plan

Community Development Plan

Housing Lenawee commissioned a Housing Strategic Plan for Lenawee County. The implementation phase of the Target Market Analysis (TMA) was published in 2023 by LandUseUSA. Lenawee County has identified a need to prioritize diversifying housing options for new and existing residents. Quality housing represents the American dream for many, and whether owner-occupied or leased, it indicates economic

prosperity for individuals and families. A sufficient housing supply, for both purchase and lease, is essential for a vibrant economy in any community.

Assessing the Overall Community Development and Housing Needs

Lenawee County's diverse economy includes manufacturing, agriculture, healthcare, education, and retail sectors. It is known for its agricultural production, mainly corn, soybeans, and dairy farming. The area offers various recreational opportunities, including parks, lakes, and outdoor activities like boating, fishing, bike trails, and hiking. The county provides many non-motorized trails, including the Hidden Lake Gardens and the Kiwanis Trail, to name two. The Irish Hills region within Lenawee County is a popular tourist destination. It also features attractions like the Crosswell Opera House, the Adrian Symphony Orchestra, the Adrian Center for the Arts, the Tecumseh Center for the Arts, the Michigan International Speedway, and several historical sites and museums.

Lenawee County, Michigan, has many strong points, including:

- Strong agricultural sector: Lenawee County is a major agricultural producer in Michigan, ranking in the top ten for producing several crops, including corn, soybeans, and wheat.
- Diverse manufacturing base: Lenawee County has a diverse manufacturing base, with companies producing a wide range of products, including automotive parts, medical devices, chemical, telescope, and agricultural businesses. The county is also home to many small businesses and startups.
- Excellent education system: Lenawee County offers 11 public school districts, several private school options, and outstanding Special Education programs. The LISD Tech Center is an asset that allows students from all Lenawee Schools to explore college and prepare for careers through 28 state-approved Career Technical Education (CTE) programs and six local district-hosted, state-approved CTE programs. In addition to Lenawee's excellent academic rankings, many school districts offer state-of-the-art Performing Arts Centers and award-winning athletic programs. The county is also home to Adrian College, Jackson College, and Siena Heights University.
- Affordable cost of living: Lenawee County has an affordable cost of living, with housing and other expenses below the state and national averages.
- High quality of life: Lenawee County offers a good quality of life with small-town charm, a safe and family-friendly environment, beautiful scenery, a solid and multi-faceted arts culture, and various recreational and cultural activities, including parks, lakes, and trails.
- Friendly and welcoming community: Lenawee County is known for its entrepreneurial qualities, unique and culturally diverse restaurants and retail, and friendly and welcoming nature.

While not all communities may be inclined to develop new housing, having a plan for future land use that guides and provides the basis for local zoning is essential and required by the Michigan Planning Enabling Act and the Michigan Zoning Enabling Act. The average cost to build a new house in Lenawee County is between \$225 and \$275 per square foot. Given this, it is conceivable that a 1,400-square-foot home would be in the \$315,000-\$385,000, which does not meet the target range of middle-income

buyers. This price point is on the high end of the buying spectrum for Lenawee County. Add in the cost of land with average lot prices between \$15,000 to \$35,000, and that 1,400-square-foot home can now reach \$340,000 to over \$400,000, taking it out of the attainable range for middle-income families.

Employment within Lenawee County is heavily concentrated in the manufacturing industry. Manufacturing alone accounts for over one-fifth of the county's employment base. Other well-represented sectors include healthcare/social assistance, retail trade, and educational services. Due to the heavy dependence on the manufacturing industry's health, the recession severely affected the local economy. Economic recovery has been modest and steady. Unemployment in the county has also fallen in line with national averages.

The median household income in Lenawee County is below the national average of \$54,149. However, because of the country's relatively low cost of living, the lower-than-average median incomes do not impact residents as negatively as in other areas where the cost of living is more significant. Compared to the overall household income distributions, a much more substantial percentage of renters fall into the lower income level than for the general and senior populations.

The owner-occupied housing market in Lenawee County is characterized as older single family homes of both pre-and post-war vintage. The rate of foreclosure is slightly above the state average. The availability of rental housing options outside the cities of Adrian and Tecumseh is minimal. In addition, the market countywide lacks sufficient elevator-served, two or more-story condominium housing or senior-oriented independent living rental options. The market would benefit from additional newer condition low to moderate-income rental housing.

Possible Long-Term Activities to Identify Needs

The Target Market Analysis (TMA) has identified a strong demand and need for new owner-occupied and for-lease units within Lenawee County. The TMA shows the highest demand is for smaller units. The current zoning ordinance, which includes minimum lot dimensions and minimum floor areas for units throughout most communities, will not allow the market to meet that demand. Allowing developers to build large units only drives up the cost of housing and will make it less attainable for middle-income buyers/ renters. Additional housing types in residential neighborhoods will increase housing supply and affordability. Research shows that limiting the land available to medium and higher-density development raises housing prices because it is an artificial restriction on supply. Expanding uses in residential zone districts to include duplexes, accessory dwelling units, townhomes, and apartment buildings is a way to create housing that serves the needs of Michigan's residents, increase housing supply, and increase housing affordability. Eliminating or lowering parking minimums can reduce the land consumed for development and significantly lower the cost of housing per unit. Building surface parking spaces generally start at \$20,000 for each space. The cost of parking also limits a developer's ability to provide more housing units. Land or square footage that could be devoted to residential dwellings is relegated to parking. Eliminating parking minimums would allow developers to create the right amount of parking for their developments.

From an employment perspective, Lenawee Now is Lenawee County's economic development agency. Lenawee Now continues business retention and attraction activities. This activity is directly related to many of our employers being able to expand their workforce or for new people to start businesses in the County. In addition to business retention and attraction, Lenawee Now partners with local educational institutions and Michigan Works Southeast, the primary non-profit employment services provider, to improve the work skills of Lenawee County residents. Some employers need help to fill skilled positions in their organizations, and retraining programs and educational offerings are targeted to address those deficiencies, improving the workforce.

The Housing Assessment found that people are drawn to housing in downtown areas because they provide a sense of place and are pedestrian-friendly. Therefore, many communities in the County focus on placemaking efforts to funnel capital into historic downtowns and surrounding older neighborhoods. This effort will hopefully produce more rental opportunities, which are currently very limited.

In addition, given the general age of the housing stock, the market would benefit from additional newer low to moderate-income rental housing. The most significant potential for affordable housing is in the higher population centers of Adrian and Tecumseh, where low to moderate-income households can benefit from convenient access to support services, employment, transportation, and local amenities. Other factors that affect the housing market include a high demand for rental units and the increasing cost of single-family homes. The younger, more mobile demographic is looking for quality rental units, knowing they will eventually move within or away from the community. An issue identified during the focus group discussions is the impact of the local, state, and federal regulatory environment on the bottom-line cost and other ways of preparing for new construction. The regulatory climate consists of local building permits, inspection fees, development review fees, sanitary and storm-sewer connection fees, water connection fees, state inspection fees, energy efficiency requirements, and other costs leading up to physical construction.

In some cases, these costs have added upwards of 30% to the expense of the new home. A challenge moving forward with any strategy will be looking at these costs and finding ways to improve the regulatory environment. Reducing these costs will create new opportunities for builders to enter the middle-income marketplace to meet the need for new housing throughout Lenawee County. The regulatory environment for new construction varies across the County. The regulatory environment consists of several items, such as the development review process, permitting costs, utility connections, taxes, environmental factors, and other regulations that add costs to the development process.

While the Redevelopment Ready Communities Program (RRC) may only be ideal for some communities, it can be used as a tool and model to improve the development review process within a community significantly. Lenawee County has five RRC-certified municipalities: the City of Adrian, the Village of Blissfield, the Village of Clinton, the City of Morenci, and the City of Tecumseh. The program intends to review all processes around redevelopment and align them to improve the overall development experience. The program can coordinate Master Plans and Zoning Ordinances to work cooperatively, along with identifying efficiencies for staff to

enhance the development review process, thereby reducing the time and cost associated with development review. Specific to Lenawee County, working with communities that prioritize housing planning will be essential. Additionally, assistance will be needed to support communities that have not completed a Master Plan. While not all communities may be inclined to develop new housing, having a plan for future land use that guides and provides the basis for local zoning is necessary and required by the Michigan Planning Enabling Act and the Michigan Zoning Enabling Act.

The Adrian-Tecumseh SmartZone encompasses two distinct areas in Lenawee County, including:

- Adrian Industrial Park and surrounding territory
- Tecumseh Business & Technology Center

These two locations provide ample space for developing new businesses, organizations, or research opportunities. Established companies looking to expand can find prime locations for new construction and a wide range of business development resources to make finding funding, a talented workforce, or other critical business infrastructure easier. The Adrian-Tecumseh SmartZone is the premier hub for innovators, visionaries, and entrepreneurs looking to grow in a driven, tech-minded community. The Adrian-Tecumseh SmartZone offers financial incentives for businesses that drive job creation and local community investment. In addition to direct funding, SmartZone also supports your business with resources to mitigate costs associated with startup, competitive growth, and training.

Contemplated Short-Term Activities to Address Needs

Through coordination and collaboration with MEDC in using the Business Revolving Loan Fund, teams continue working with local businesses to work on expansion needs and assist new start-up companies in the marketplace.

The Lenawee County Landbank has several infill lots and properties that may be conducive to low-to-moderate income rental single-family homes. Several properties throughout Lenawee County are and will be held by the Lenawee County Land Bank Authority. The Landbank is a powerful locational incentive that encourages redevelopment in communities and neighborhoods that an out-migration of residents and businesses has blighted. Through the Land Bank Act, Land Banks have access to specific economic development tools that can be lucrative to potential investors and developers.

Lenawee County Financial Supports and Resources

- MSHDA Multifamily Direct Lending: MSHDA offers direct lending to eligible borrowers in the form of loans from both tax-exempt and taxable bonds, as well as MSHDA gap funding loans and equity bridge loans in certain situations, for the development of affordable rental housing. MSHDA direct lending programs are available for new construction and acquisition and rehabilitation of affordable or conventionally financed rental housing, mixed-use buildings, or the adaptive reuse of other structures.
<https://www.michigan.gov/mshda/developers/multifamily-direct-lending-pgrms>
- MSHDA Neighborhood Enhancement Program: The NEP program's primary goals are to identify and fund innovative activities to address specific needs, assist and showcase where people are engaged and facilitating change, and

provide funding to facilitate and implement additional activities. The NEP program can financially assist high-impact, innovative, neighborhood housing-oriented activities that benefit low- and moderate-income areas and residents. All components are designed to fund tangible housing-oriented activities: implementation ready, highly visible, impactful to the communities and residents qualify of life, holistically focused, and where there is buy-in and demonstrated local support. The NEP program is made available statewide through a yearly competitive funding round to applicants consisting of local nonprofit agencies (501c3) and local units of government. <https://www.michigan.gov/mshda/neighborhoods/neighborhood-enhancement> 22

- MEDC Community Revitalization Program: The Michigan Community Revitalization Program (MCRP) is an incentive program available from the Michigan Strategic Fund (MSF) in cooperation with the Michigan Economic Development Corporation (MEDC). The program is designed to provide grants, loans, or other economic assistance for eligible investment projects in Michigan and promote community revitalization to accelerate private investment in the following categories: • Areas of historical disinvestment. • Contribute to Michigan's reinvention as a vital, job-generating state. • Foster redevelopment of functionally obsolete or historic properties. • Reduce blight. • Protect the natural resources of this state. <https://www.miplace.org/programs/michigan-community-revitalization-program/>
- Opportunity Zones: Opportunity Zones are a tool enacted in the 2017 Tax Cuts and Jobs Act. The program is designed to incentivize patient capital investments in low-income communities nationwide that have been cut off from capital and experienced a lack of business growth. Three types of tax incentives relate to the treatment of capital gains; each is connected to the longevity of an investor's stake in a qualified Opportunity Fund that provides the most upside to those who hold their investment for ten years or more. Preliminary information indicates that an Opportunity Zone can be utilized as a primary investment in various activities. Funds can be used to create new businesses, new commercial or residential real estate, or infrastructure. Opportunity Zones can be used to invest in existing businesses if they double the investment basis over 30 months. The incentive can also be combined with other tools, such as New Market Tax Credits (NMTC), Low-Income Housing Tax Credits (LIHTC), and historic rehabilitation tax credits, adding a valuable package for economic and community development. Communities in Lenawee County should also consider creating and targeting other resources, especially job training, that will play an important role in leveraging investments. New activity within the community will help reveal that these and other opportunities exist. <https://www.michigan.gov/mshda/developers/opportunity-zones> 23
- New Market Tax Credits: Historically, low-income communities experience a lack of investment, as evidenced by vacant commercial properties, outdated manufacturing facilities, and inadequate access to education and

healthcare service providers. The New Market Tax Credit Program (NMTC Program) aims to break this cycle of disinvestment by attracting the private investment necessary to reinvigorate struggling local economies. The NMTC Program attracts private capital into low-income communities by permitting individual and corporate investors to receive a tax credit against their federal income tax in exchange for making equity investments in specialized financial intermediaries called Community Development Entities (CDEs). The credit totals 39% of the original investment amount and is claimed over seven years. <https://www.cdfifund.gov/programs-training/programs/new-markets-tax-credit>

- Low-Income Housing Tax Credit: The Low-Income Housing Tax Credit (LIHTC) is the most important resource for creating affordable housing in the United States today. The LIHTC database, created by HUD and available to the public since 1997, contains information on 45,905 projects and 2.97 million housing units placed in service between 1987 and 2015. It is recommended that all communities in the County support LIHTC proposals. <https://www.michigan.gov/mshda/developers/lihtc/lihtc/low-income-housing-tax-credit-lihtc>
- Obsolete Property Rehabilitation Credit: The Obsolete Property Rehabilitation Act (OPRA), Public Act 146 of 2000, provides a tax incentive to encourage the redevelopment of obsolete buildings. A new exemption will not be granted after December 31, 2026, but an exemption then in effect will continue until the certificate expires. The tax incentive is designed to assist in redeveloping older buildings in which a facility is contaminated, blighted, or functionally obsolete. The goal is to rehabilitate older buildings into vibrant commercial and mixed-use projects. <https://www.michigan.gov/taxes/property/exemptions/obsolete/obsolete-property-rehabilitation-act-opra> 8. Brownfield Redevelopment Authority (Act 381): Once created, a BRA reviews the proposal for the redevelopment of eligible property and determines what financial incentives are necessary to enable success. The authority prepares a plan that identifies the brownfield projects. Each plan project section includes the description of the eligible property, the eligible activities, the TIF approach to be taken, and other issues related to the subject parcels. 24 The authority then recommends to the municipality's governing body (city or village council, township board, or county commission) that the decision-making body holds a public hearing regarding the plan and subsequently acts to approve modifications or deny the plan. The authority would recommend revisions to the plan as new projects are submitted or revisions are requested on existing plan projects. The act has been recently amended to include housing projects eligible for TIF capture funding. The projects can either be administered through MSHDA or a local authority. The state education tax may also be captured if the project is market rate and administered through a local authority. More information: <https://www.michigan.gov/egle/about/organization/remediation-and-redevelopment/brownfields>

- **Municipal/Nonprofit Public Private Partnerships (P3):** This opportunity would allow a municipality or nonprofit agency to partner with a for-profit builder to develop new housing options across the region. By partnering, the developers/builders can get land at a lower cost, thereby reducing total construction costs. In theory, the municipality/nonprofit could hold the land, reducing holding costs and taxes while the project is under construction. The P3 could also be instrumental in developing infrastructure on the property and eventually recuperating initial costs upon the property's final sale. 10.

Neighborhood Improvement Authority: Through the provisions of Public Act 57 of 2018, a Neighborhood Improvement Authority (NIA) may be established. An NIA may use its funds, including tax increment financing, to fund residential and economic growth in residential neighborhoods. An authority may also issue bonds to finance these improvements. Once established, the NIA prepares a development plan and a tax increment financing plan to submit for approval to the local municipality. A development plan describes the costs, location, and resources for implementing the public improvements that are projected to take place in the NIA district. 25 A tax increment financing plan includes the development plan and details the tax increment procedure, the amount of bonded indebtedness to be incurred, and the duration of the program. After the adoption of the two plans, the development plan is implemented, and the tax increments, which occur because of improvements in the eligible property, accrue to the NIA to be used as required by the development plan. The activities of the NIA may be financed by a) donations to the authority, b) revenue bonds, c) revenues from buildings or property owned or leased by the NIA, d) tax increments, e) special assessments, and f) grants. It is recommended that Lenawee County consider utilizing NIA's in areas of disinvestment or areas in need of infrastructure or structural improvements, predominantly in older neighborhoods within cities and villages.

<https://www.miplace.org/4a73da/globalassets/documents/factsheets/neighborhood-improvementauthority-pa-61.pdf>
- **Housing and Community Development Fund:** Lenawee County communities could also create a housing development assistance program (HDAP) in partnership with the local Brownfield Redevelopment Authority (MCL Act 381) and the Land Bank for the State of Michigan. The purpose of the HDAP is to provide financing assistance to developers interested in building new housing (attached or detached formats) for buyers within the HUD-defined range of 80% to 110% of local Area Median Income (AMI). This would translate to a sales price range of \$150,000 - \$225,000. For a builder to build a new housing structure in this sales price range, there is almost always a financial gap between the final sales and construction costs. The HDAP program utilizes Tax Increment Finance, established by a TIF district, to assist with closing that financial gap.

<https://www.michigan.gov/mshda/developers/housing-and-community-development-fund-hcdf-26>

- Federal Home Loan Bank: Serving Michigan, the FHLB of Indianapolis is one of 11 Regional FHLBank offices that support mortgage lending and community investment through their member organizations (in Lenawee, financial institutions). FHLB's primary objectives are to support housing finance and community development and provide direct support for affordable housing. Products and services include forgivable grants and loans in support of home repairs, down payment assistance to increase affordability, new housing development, and much more.
<https://fhlbanks.com/>
- Residential Facilities Exemption: The Residential Housing Facilities Act (known as the Residential Housing Exemption), 2022 PA 237, provides a tax incentive to owners of rental housing property of more than four units to enable the renovation and expansion of aging facilities and assist in building new facilities. A Residential Housing Exemption Certificate (RHEC) entitles the facility to an exemption from ad valorem real property taxes for a term of one to twelve (1-12) years as determined by the local governmental unit. Applications are filed, reviewed, and approved by the local governmental unit. The State Tax Commission (STC) must also approve the application and issue the exemption certificate.
<https://www.michigan.gov/taxes/property/exemptions/residential-housing-exemption>
- Neighborhood Enterprise Zone (NEZ): The Neighborhood Enterprise Zone Act, PA 147 of 1992, as amended, provides for the development and rehabilitation of residential housing located within eligible distressed communities. New and rehabilitated facility applications are filed, reviewed, and approved by the local government unit but are also subject to review at the State level by the Property Services Division. The State Tax Commission (STC) is responsible for the final approval and issuance of new and rehabilitated facility certificates. Exemptions for new and rehabilitated facilities are not effective until the STC approves. NEZ Homestead applications are filed, reviewed, and approved by the local unit of government. The City of Adrian has five approved NEZs.
<https://www.michigan.gov/taxes/property/exemptions/nez/neighborhood-enterprise-zone-nez-act>
- Attainable Housing Exemption: The Attainable Housing Facilities Act (known as the Attainable Housing Exemption), 2022 PA 236, provides a tax incentive to owners of rental housing property of not more than four units to enable renovation and expansion of aging facilities and assists in the building of new facilities. An Attainable Housing Exemption Certificate (AHEC) entitles the facility to an exemption from ad valorem real property taxes for one to twelve 1-12 years as determined by the local governmental unit. Twenty-seven of the local governmental units file, review, and approve applications. The State Tax Commission (STC) must also approve the application and issue the exemption certificate.
<https://www.michigan.gov/taxes/property/exemptions/attainable-housing-exemption>

- USDA Rural Development Grants and Housing Support: Rural Housing site loans provide two types of loans to purchase and develop housing sites for low- and moderate-income families: a. Section 523 loans are used to acquire and develop sites only for housing to be constructed by the Self-help method. Refer to RD Instruction 1944-I for more information about the Self-Help program. b. Section 524 loans are made to acquire and develop sites for low- or moderate-income families, with no restriction as to the method of construction. Low income is between 50-80% of the Area Median Income (AMI); the upper limit for moderate income is 115% of the AMI. Who may apply for this program? • Section 523 loans: Private or public nonprofit organizations that will provide sites solely for self-help housing. • Section 524 loans: Private or public nonprofit organizations. The building site may be sold to low- or moderate-income families utilizing USDA's Housing and Community Facilities Program's (HCFP) loan programs or any other mortgage financing program that serves low- and moderate-income families. Nonprofits that have the legal authority to operate a revolving loan fund. Nonprofits with the financial, technical, and managerial capacity to comply with relevant federal and state laws and regulations. • Federally-recognized Tribes. The USDA Rural Development Summary of Major Programs Guide can be found here: https://www.rd.usda.gov/files/RD_ProgramMatrix.pdf 28
- USDA Rural Development: The Rural Community Development Initiative Grant's typical open period is July of each year. Nonprofits or public bodies can apply. The grant aims to improve housing, community facilities, and community and economic development projects in rural areas. <https://www.michigan.gov/mdard/business-development/grantfund/rural-readiness-grant-program>
- MDARD Rural Readiness Grant Program: The Rural Readiness Grant Program is focused on activities that prepare your community or organization for longer-term solutions, future investment, or larger funding opportunities for priority issues in your community. A list of eligible project types is available online at <https://www.michigan.gov/mdard/business-development/grantfund>. Some examples of potential projects for this funding include, but not limited to: Plans or feasibility studies for a community/business incubator. Leadership development or governance programs. A shared grant writing or project management model supported by/available to multiple organizations. Planning for infrastructure or housing needs within a particular neighborhood or community.
- Grants.gov: This website is updated often with grant opportunities available from HUD. An example at the time of this publication is the FY2023 Choice Neighborhoods Implementation Grants, which city governments can apply for. This grant supports the implementation of comprehensive neighborhood revitalization plans that are expected to achieve the following three core goals: Housing, People, and Neighborhood. Grants.gov is constantly updated and should be monitored for housing-related funding and other resources

through HUD.

https://www.hud.gov/program_offices/cfo/gmomgmt/grantsinfo/fundingopp

- **Community Capital:** Community capital is defined as capital sourced from a broad cross-section of the community and invested in the community. It is more than a legal and financial strategy at its core; it's about equity, inclusivity, empowerment, and shared prosperity. Community capital has been empowered by recent legislation, policy, and management tools that enable virtually any/every community member to invest in community-based projects, including housing. There are now also community investment fund structures that can raise local investment into a fund that can help build or renovate housing. For more information, contact www.nc3now.org
- **Philanthropic Capital:** The philanthropic world is more and more frequently engaged in "impact investing," notably looking to solve local problems by partnering with traditional sources of capital. There are many housing projects in Michigan and nationwide where capital is provided as seed or match money from community and family foundations, most often from program income funds but now from corpus funds. Philanthropic capital is most often seen as part of the capital required for low-income or affordable housing and workforce housing, generally where there is a social good tied to a housing project. Contact local foundations or the Council of Michigan Foundations at www.michiganfoundations.org
- **Faith-Based Property:** While communities across the country struggle to provide affordable housing options for their most vulnerable citizens, a new set of sometimes-overlooked development partners is rising to the challenge: religious institutions. Many of these institutions own vacant buildings and underutilized land in established neighborhoods. Projects to repurpose unneeded land surrounding a religious worship structure often involve a still-active (though possibly struggling) congregation interested in addressing the affordability challenge and preserving or improving the future of that worshipping community. Since the "excess" land that may be made available for housing is often currently used as a parking lot, they also frequently involve questions of zoning regulations requiring minimum amounts of parking. In conclusion, several federal, state, and local financial support programs exist that will improve and revitalize existing housing stock throughout the County. Leveraging these financial tools, as well as revising the regulatory process discussed in this strategy, will assist in strengthening and diversifying the housing stock

Lenawee County Implementation Strategies

Focused and dedicated implementation strategies are:

- This includes preparing an inventory of available land, including ownership, tax, and zoning information. The availability and location of public utilities should also be included.
- The communities within Lenawee County must obtain ownership of tax foreclosure properties with development/redevelopment potential for mixed-use projects or housing.

	<ul style="list-style-type: none"> • Leverage opportunities were provided through a partnership with Lenawee County Land Bank Authority, including using Act 381, Brownfield Redevelopment TIF. • Identify key neighborhoods to prioritize and focus on infill redevelopment, rehabilitation resources, and efforts for new and existing housing. This could be done by identifying opportunity neighborhoods. • Ensure the zoning and building review process is quick and efficient to avoid unnecessary delays. It would benefit the County or Housing Lenawee to work with the MEDC Redevelopment Ready Communities program (RRC) to determine which communities are working through the certification process and which communities have improved or streamlined the development review process and promote those communities utilizing best practices. • Local companies and financial institutions (ProMedica, for example) should be recruited as partners in housing development since they depend upon the ability to attract quality employees and customers. This includes industrial companies, who should be called upon to help finance and fund local housing development activities. • Lenawee County should establish a direct marketing program to promote the community and attract developers. • Explore the creation of a county-wide community land trust that can assist with long-term affordable/middle-income housing throughout the County. A community land trust (CLT) is a private, nonprofit organization that owns land for a community, promoting housing affordability and sustainable development and mitigating historical inequities in homeownership and wealth building. • Investigate the creation of a county-wide development risk insurance fund that would allow developers and builders to borrow money from lending institutions while protecting them from foreclosures. This will help free up funding for projects that lending institutions consider speculative. • Identify opportunities to introduce modular housing into the community as an alternative to traditional stick-built units. This can include shipping containers with design standards to ensure they fit into the community.
2	<p>Planned Short-Term Activities (1–2 Years)</p> <p>Summarize planned short-term activities (lasting one to two years) that will address the identified community development and housing needs within the UGLG’s jurisdiction.</p> <p>Over the next one to two years, Lenawee County plans to undertake a targeted housing rehabilitation program aimed at improving the living conditions of approximately 75 low and moderate-income (LMI) households across the county. This initiative directly addresses the critical housing needs identified in the county’s Housing Needs Assessment, including the prevalence of aging housing stock, deferred maintenance, and housing affordability challenges for LMI residents.</p> <p>The program will focus on the rehabilitation of single-family, owner-occupied homes, with the following core goals:</p>

	<ul style="list-style-type: none"> • Improve health and safety: Address code violations, leaky roofs, and other hazards that pose risks to occupants. • Preserve affordable housing: Help low-income homeowners remain in their homes by making necessary repairs they cannot afford on their own. • Increase energy efficiency: Replace inefficient windows, insulation, and HVAC systems, to reduce energy costs and environmental impact. <p>This program will exclusively serve households earning at or below 80% of Area Median Income (AMI), with priority given to:</p> <ul style="list-style-type: none"> • Seniors on fixed incomes • People with disabilities • Households with children • Homes in areas with concentrated blight or infrastructure needs <p>The County anticipates the following schedule:</p> <ul style="list-style-type: none"> • Months 1–3: Secure third-party administrator, Conduct outreach, application intake, income verification, and environmental reviews • Months 4–6: Scope of work development, contractor bidding, and selection • Months 6–24: Rehabilitation work performed on rolling basis, averaging 3–5 homes per month <p>By the end of the two-year project period, Lenawee County anticipates to achieve the following:</p> <ul style="list-style-type: none"> • Preservation of 75 affordable housing stock for LMI households in Lenawee County • Improved quality of life and housing stability for approximately 150–200 residents • Reduced neighborhood blight and increased community pride in target areas <p>This housing rehab initiative is part of Lenawee County’s broader strategy to improve living conditions for low-income residents and support long-term community development goals.</p>
3	<p>Planned Long-Term Activities (2+ Years)</p> <p>Provide a summary of planned long-term activities (lasting two years or more) designed to address the identified community development and housing needs within the UGLG’s jurisdiction.</p> <p>Lenawee County is committed to a sustained, multi-year effort to address the critical community development and housing challenges facing low- and moderate-income (LMI) residents. In addition to short-term housing rehabilitation efforts, the County is</p>

developing and implementing long-term strategies that will have a broader and more permanent impact on housing stability, infrastructure, and quality of life.

Ongoing Housing Rehabilitation and Preservation

Building on the success of the current housing rehabilitation program, Lenawee County plans to:

- Support ongoing home repairs for LMI homeowners
- Expand the program to include manufactured housing, rental units, and homes in targeted revitalization areas
- Partner with local lenders and nonprofit housing organizations to offer additional housing services

Lenawee County recognizes a shortage of quality, affordable rental and ownership housing. Over the long term, Lenawee County intends to:

- Collaborate with developers, local and state land banks, and non-profits to encourage the construction of new affordable housing units
- Seek Low-Income Housing Tax Credits (LIHTC) and other state/federal incentives to support multi-family and workforce housing development
- Prioritize infill development and redevelopment of vacant or underused parcels in urban and rural areas with existing infrastructure

To improve the livability and safety of LMI communities, Lenawee County will:

- Continue to identify and remove or repurpose blighted structures, focusing on properties that create public safety or health hazards
- Support neighborhood beautification and public space improvements, including sidewalks, parks, and lighting
- Implement targeted reinvestment in neighborhoods with high concentrations of LMI residents, including leveraging CDBG and other funding sources

Lenawee County's long-term development vision includes:

- Upgrading water, sewer, and stormwater systems, especially in rural and underserved areas
- Improving ADA accessibility in public buildings, sidewalks, and community facilities to ensure equitable access
- Investing in broadband infrastructure to close the digital divide in remote areas of the county

The County also recognizes the need to support residents beyond physical infrastructure by:

	<ul style="list-style-type: none"> • Expanding homeowner education, financial literacy, and foreclosure prevention counseling • Supporting programs that assist elderly residents and people with disabilities to age in place safely • Partnering with local nonprofits, health agencies, and housing providers to provide wraparound services for vulnerable populations
4	<p>Impact of the Proposed CDBG Activities</p> <p>Based on the identified needs, describe the anticipated impact of the proposed CDBG activities. Explain how activities complement the short-term and long-term activities outlined in the previous sections and contribute to the overall development goals of the UGLG.</p> <p>The proposed CDBG activities are designed to directly address Lenawee County’s identified needs, including substandard housing conditions, aging infrastructure, and targeted neighborhood revitalization. By focusing on housing rehabilitation, the project will have both immediate and lasting impacts on the health, safety, and economic stability of low- to moderate-income (LMI) residents.</p> <p>In the short term, these activities will:</p> <ul style="list-style-type: none"> • Improve the quality and safety of housing for vulnerable households • Stimulate local job creation through construction and contracting opportunities <p>In the long term, the CDBG investment will:</p> <ul style="list-style-type: none"> • Stabilize neighborhoods by improving the overall housing stock • Support broader revitalization efforts, attracting private investment and encouraging resident retention • Reduce public health risks and environmental hazards, aligning with county-wide sustainability goals <p>These activities align closely with Lenawee County’s strategic development goals, which prioritize equitable access to safe housing, sustainable infrastructure, and improved quality of life for all residents, particularly those in underserved areas. They also complement ongoing efforts detailed in the county’s housing and community development strategies, ensuring that Lenawee County’s approach ensures that CDBG activities are not isolated interventions, but rather an integral part of a coordinated effort to create lasting, positive changes in Lenawee’s communities.</p>
5	<p>Plan for Minimizing and Addressing Displacement</p> <p>Describe the strategy for minimizing displacement caused by grant-assisted activities and the approach for assisting individuals who are actually displaced. Reference your locally adopted Residential Anti-Displacement Plan as applicable or develop a new plan.</p>

Lenawee County is committed to minimizing and, where necessary, mitigating any displacement that may result from CDBG-assisted activities. Lenawee County's housing rehabilitation program, which focuses on owner-occupied, single-family homes, is specifically designed to avoid displacement altogether. Rehabilitation work will be carefully scheduled and implemented in a way that allows residents to remain in their homes during repairs whenever possible.

To reduce the likelihood of temporary or permanent displacement Lenawee County will take the following actions:

- Conduct a thorough pre-rehab assessment to identify potential work that might disrupt occupancy and adjust project scope or phasing accordingly.
- Prioritize in-place rehabilitation strategies that allow residents to stay in their homes during most of the work.
- Schedule work to minimize the time in which critical systems are offline.
- Clearly communicate timelines with homeowners and provide flexibility to accommodate household needs.
- These efforts are consistent with MSHDA and HUD's goal to minimize displacement and disruption to households benefiting from CDBG-funded programs.

All residents will be informed of their rights and assistance options prior to any relocation.

Lenawee County has adopted a Residential Anti-Displacement and Relocation Assistance Plan (RADRAP) in compliance with Section 104(d) of the Housing and Community Development Act. The Plan outlines policies for:

- Avoiding displacement to the maximum extent feasible
- Providing relocation benefits and advisory services to those displaced
- Replacing any low- or moderate-income housing units demolished or converted because of CDBG activities

A copy of the current RADRAP is on file and available upon request. If updates are required as part of this application or project, the County will revise and adopt a current version consistent with MSHDA/HUD guidance.

In the rare event that, temporary relocation is required due to unsafe or inaccessible living conditions during repairs, Lenawee County will provide relocation assistance in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) and HUD's requirements. Assistance may include:

- Temporary lodging costs
- Transportation support

	<ul style="list-style-type: none"> Per diem allowances for meals or other necessary expenses <p>If the issue is Lead removal, we will work with CAA who can temporarily house client households while the Lead is being removed from the home.</p>
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D	PROJECT MANAGEMENT OVERVIEW
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1	<p>Activity Type(s): Check all that apply</p> <p><input checked="" type="checkbox"/> Homeowner Rehabilitation <input type="checkbox"/> Manufactured Housing</p> <p><input type="checkbox"/> Housing Infrastructure <input type="checkbox"/> Reconstruction</p> <p><input type="checkbox"/> <input type="checkbox"/> Unoccupied Rental Rehabilitation</p> <p>A corresponding Application Supplement must be attached for each selected activity, detailing specific implementation strategies.</p> <p style="text-align: center;">Homeowner Rehabilitation</p> <p>1. Program Purpose The Homeowner Rehabilitation Program is designed to preserve affordable housing for low- to moderate-income households in Lenawee County. The funding will address health, safety, and structural deficiencies that, if left uncorrected, could lead to displacement or further deterioration of the housing stock.</p> <p>2. Eligibility Criteria</p> <ul style="list-style-type: none"> Household Income: Not to exceed 80% of Area Median Income (AMI), adjusted for household size Ownership Requirement: Applicant must own and occupy the home as their primary residence Property Type: Single-family homes, including manufactured housing (when on permanent foundations) Priority Populations: Elderly, disabled, families with children, and households at risk of displacement <p>3. Rehabilitation Activities Eligible improvements may include:</p> <ul style="list-style-type: none"> Roof replacement and structural repairs HVAC system replacement or upgrades Electrical and plumbing repairs Window and door replacement Siding and insulation improvements Accessibility modifications (ramps, grab bars, etc.) Other health and safety-related repairs <p>4. Selection & Procurement</p> <ul style="list-style-type: none"> Work will be completed by licensed and insured contractors A minimum of two written quotes will be obtained for each rehabilitation project to determine cost reasonableness Contractors will be selected through a process following state and federal procurement standards Preference will be given to local contractors when feasible
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	<p>5. Program Administration</p> <ul style="list-style-type: none"> • Application Intake: Managed by the Lenawee County Community Development Office in partnership with a Third-Party Administrator • Verification: Income verification, ownership documentation, and property eligibility review conducted before approval • Scope of Work: A qualified rehabilitation specialist will prepare specifications and cost estimates • Oversight: County staff will monitor contractor performance and conduct inspections before progress payments are issued <p>6. Timeline</p> <ul style="list-style-type: none"> • Application Period: Rolling acceptance until funds are expended. • Average Rehabilitation Completion: 90-120 days per home. • Project Closeout: All rehabilitation projects will be completed and reported within the CDBG grant cycle. <p>7. Monitoring & Compliance</p> <ul style="list-style-type: none"> • All activities will comply with CDBG regulations, HUD Housing Quality Standards, and Michigan building codes. • Environmental Review Records (ERR) will be completed as required before construction. • Files will be maintained for each assisted household, documenting eligibility, scope of work, and expenditure. • Final inspections and homeowner sign-off required before closeout. <p>8. Performance Measures</p> <ul style="list-style-type: none"> • Target Units: seventy-five low- to moderate-income homes rehabilitated. • Outcomes: <ul style="list-style-type: none"> • Improved housing safety and habitability • Extended the useful life of the existing housing stock • Prevention of displacement of vulnerable households • Increased neighborhood stability
2	<p>Administrative Services</p> <p>Select one:</p> <p><input type="checkbox"/> Employees of the UGLG will administer the program.</p> <p><input checked="" type="checkbox"/> CDBG funds will be used to pay a third-party administrator to assist the UGLG with grant administration. Federal procurement compliance is required. The UGLG must request and receive authorization from MSHDA prior to signing an administration contract or incurring administrative costs.</p> <p><input type="checkbox"/> Non-CDBG funds will be used to pay a third-party administrator to assist the UGLG with grant administration. Name of third party, if known:</p>
3	<p>Procurement of Third-party Administrator</p> <p><input checked="" type="checkbox"/> Applicable <input type="checkbox"/> Not Applicable</p> <p>If applicable, explain the process to be used for procuring the third-party administrator.</p> <p>Lenawee County’s procurement policy can be found here:</p>

<https://www.lenawee.mi.us/DocumentCenter/View/1872/Federal-Awards-Administration>

The following is the Procurement Policy:

Uniform Guidance Compliance Supplement - Procurement, Suspension and Debarment

Source of Governing Requirements – The requirements for procurement are contained in the Uniform Guidance, program legislation, Federal awarding agency regulations, and the terms and conditions of the award.

The requirements for suspension and debarment are contained OMB guidance in 2 CFR part 180, which implements Executive Orders 12549 and 12689, Debarment and Suspension; Federal agency regulations in 2 CFR implementing the OMB guidance; the Uniform Guidance; program legislation; Federal awarding agency regulations; and the terms and conditions of the award.

In order to ensure compliance with these requirements, Lenawee County has implemented the following policies and procedures:

1. Purchasing and procurement related to Federal grants will be subject to the general policies and procedures of the County. (See County Bidding Policy.) Which is attached under the Policy attached.

2. Contract files will document the significant history of procurement, including rationale for the method of procurement, selection of the contract type, contractor selection or rejection, and the basis of contract price. POL 2024-020 Federal Awards Policy Date of Adoption: 12/2006 Reviewed: 01/2018, 11/2024

3. Procurement will provide for full and open competition.

4. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The officers, employees, and agents can neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. If the financial interest is not substantial or the gift is an unsolicited item of nominal value, no further action will be taken. Disciplinary actions will be applied for violations of such standards otherwise.

5. The County will avoid acquisition of unnecessary or duplicative items. Consideration will be given to consolidating or breaking out procurements to obtain a more economical purchase. Where appropriate, an analysis will be made of lease versus purchase alternatives, and any other appropriate analysis to determine the most economical approach. The County will also analyze other means, as described in §200.318 of the Uniform Guidance, in order to ensure appropriate and economic acquisitions.

6. The Government is prohibited from contracting with or making subawards under covered transactions suspended, debarred parties, or whose principals are suspended or debarred. "Covered transactions" include those procurement contracts for goods and services awarded under a non-procurement transaction (i.e., grant or cooperative agreement) expected to equal or exceed \$20,000 or meet certain other specified criteria. All no procurement transactions (i.e., subawards to subrecipients), irrespective of award amount, are considered covered transactions.
7. Lenawee County will include a suspension/debarment clause in all written contracts in which the vendor/contractor will certify it is not suspended or debarred. The contract will also contain language requiring the vendor/contractor to notify the Government immediately upon becoming suspended or debarred. This will serve as adequate documentation as long as the contract remains in effect.
8. The Program Director or designee will be responsible for running a year-to-date transaction report from the County's accounting system. Any vendor with accumulated transactions equaling or exceeding \$20,000 that is not subject to a written contract including a suspension/debarment clause or for which a signed statement or suspension or debarment is not on file will be subject to additional procedures. The Program Director or designee will check the Excluded Parties List System (EPLS) maintained by the General Services Administration (GSA) for the vendor's name. A potential match will be followed-up on immediately. Each vendor searched on EPLS will be initialed on the vendor transaction report and the report will POL 2024-020 Federal Awards Policy Date of Adoption: 12/2006 Reviewed: 01/2018, 11/2024 be signed and dated on the first or last page. The vendor transaction report will be retained as evidence of the control.
9. If a vendor is found to be suspended or debarred, the County will immediately cease to do business with this vendor.
10. Executed contracts and signed quarterly vendor transaction history reports will be retained and filed by the Program Director.

Bidding Policy

Date of Adoption: 7/12/2000
Amendments: 1/09, 7/11, 6/17

Sealed Bids: Competitive bids shall be solicited for all contracts in which the total County obligation is anticipated to be \$50,000 or more. The requirement for competitive bids shall not apply to intergovernmental contracts. All bid proposals shall be reviewed and approved by the Administrator's Office prior to distribution.

Bid and Performance Bonds: The Administrator's Office shall determine the necessity of a bid or performance bond for each bidding process. For construction projects in excess of \$100,000, a performance bond of 100% of the project cost shall be required. The responsible committee is authorized to require performance bonds for projects less than \$100,000 if it is deemed necessary. Performance and bid bond requirements may be waived, as necessary, at the discretion of the responsible committee.

Quotes and estimates: For goods and services anticipated to cost less than \$20,000, County departments, boards, and committees are authorized to determine the best method of procurement including the bidding process, quotes, and estimates. Evaluation and selection of the appropriate method are to be handled on a case-by-case basis.

Local preference: Local vendors are encouraged to submit proposals on bid requests to provide goods and/or services to Lenawee County government. The increase in economic activity through local jobs, tax revenues, and expenditures, resulting from contracting with local vendors is evaluated in the cost consideration. Other considerations include quality, service, and time constraints. The lowest cost proposal does not necessarily result in the award of the proposal, because of other factors also being evaluated.

Use of another organization's bidding procedures: It will be an acceptable practice for any Lenawee County agency or department to utilize a third party to conduct bidding for goods and/or services upon advanced approval of the County Administrator. Documentation relating to the third party's bidding policy must be submitted with the request for approval. POL#2023-003 Lenawee County Board of Commissioners Page 2 of 2.

Authority to award bids: The Board of Commissioners may assign authority to award a bid to a named county official otherwise the Board reserves to itself the authority to award the bid.

Ability to override: The Board of Commissioners may waive this bidding policy by a 2/3 majority vote if such action is determined to be in the best interests of the County.

PASSED BY ROLL CALL VOTE of the Lenawee County Board of Commissioners at a regular meeting held Wednesday, June 14, 2023, in the Old Courthouse, Adrian, Michigan. James E. Van Doren, Chair; Roxann Holloway, County Clerk

4 **Activity Oversight & Administration**
 Describe how the UGLG will provide oversight across all selected activities, ensuring compliance with program requirements. Use **Form 13-A “Grant Management Plan”** from Chapter 13 of the [MSHDA CDBG Policy Manual](#) as a guide when outlining your response. Include:

- a) The structure for managing program administration and oversight.
- b) Roles and responsibilities of staff, contractors, or agencies in ensuring successful implementation.
- c) How the UGLG will manage key regulatory requirements including Environmental Review.
- d) Strategies for monitoring activities and addressing compliance issues.

a) Lenawee County may contract with experienced consultants or partner agencies to assist with portions of the program), but Lenawee County will retain responsibility for overall oversight and compliance.

b) Roles and Responsibilities

Role/Entity	Responsibilities
CDBG Program Administrator (County Staff Overall project coordination; & Third-Party Administrator	communication with MSHDA;

	<p>Procurement Officer</p> <p>Construction Manager / Housing Rehab Specialist (<i>County staff or third-party consultant</i>)</p> <p>Environmental Review Officer</p> <p>Finance Department</p> <p>Contractors/Subrecipients/Third Party Administrator</p>	<p>compliance tracking; reporting; procurement and file management.</p> <p>Ensures proper bidding, contract execution, and adherence to 2 CFR Part 200 procurement standards.</p> <p>Performs housing inspections; prepares scopes of work; oversees contractor performance; ensures HQS compliance.</p> <p>Coordinates environmental review process for all rehab sites prior to project start.</p> <p>Manages draw requests, financial reporting, and fund reconciliation.</p> <p>Provide construction services; must meet licensing, insurance, and federal labor standards (if triggered).</p>
<p>c) Management of Key Regulatory Requirements</p>		
<ul style="list-style-type: none"> • Environmental Review: Lenawee County will ensure the Environmental Reviews have been completed by our third-party administer while we ensure all required environmental reviews have been completed in accordance with 24 CFR Part 58 prior to the commitment of funds or start of work. A designated Environmental Review Officer will ensure proper categorization, consultation, and documentation of all projects. No construction work will begin until the Authority approves each project. • Procurement: All procurement activities will comply with 2 CFR 200.318–326 and MSHDA guidelines. The County will maintain full procurement records and ensure that all contractors/third-party administrators meet federal requirements. • Labor Standards: Although Davis-Bacon prevailing wage requirements typically do not apply to single-family homeowner rehab, the County along with its third-party administrator will monitor each project for applicable labor standards compliance and verify if thresholds are triggered (e.g., for multifamily or multi-unit projects). • The County will promote fair housing and equal opportunity in all CDBG-funded activities and ensure compliance with Section 3 where applicable. Outreach to Section 3 businesses and workers will be conducted in accordance with MSHDA policy. 		
<p>d) Monitoring and Compliance Strategies</p>		
<p>To ensure successful implementation and prevent compliance issues, Lenawee County will implement the following monitoring strategies:</p>		

	<ul style="list-style-type: none"> • Monthly internal status reviews with the Community Development Coordinator, Finance, and any contracted partners including third-party administrators to assess project progress, budget, and compliance milestones. • Quarterly reporting to MSHDA including beneficiary data, financial tracking, and project status. • On-site monitoring visits by the Community Development Coordinator or third-party inspector to verify project progress and contractor performance. • File reviews and document audits to ensure all required records (e.g., income documentation, environmental clearances, procurement records, invoices) are accurate, complete, and accessible. • Corrective action plans will be implemented immediately if any compliance concerns arise, and issues will be documented and resolved before proceeding further. <p>Lenawee County will also participate in all required training, technical assistance, and monitoring conducted by MSHDA and HUD to maintain high standards of program integrity and grant performance.</p>
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E	BUDGET – Reflect costs to be incurred after application submission only.					
	ACTIVITY	TOTAL # OF UNITS	CDBG FUNDS	LEVERAGE/MATCH FUNDS		TOTAL PROPOSED BUDGET
				UGLG	OTHER SOURCES	
	Homeowner Rehab	75	\$1,230,000	\$	\$	\$ 1,230,000
	Infrastructure (Housing)					
	Reconstruction					
	Unoccupied Rental Rehab					
	Manufactured Housing					
	Administration		\$270,000			\$270,000
	TOTAL		\$ 1,500,000	\$	\$	\$ 1,500,000

F	CAPACITY AND IMPLEMENTATION				
1	<p>Organization and Staff Capacity Describe the organizational capacity, staff composition, and grants management experience of the UGLG and, if applicable, its third-party administrator. If known, attach resumes or job descriptions for key staff.</p> <p>Description: Lenawee County has a positive record of successfully managing federal and state-funded programs, including previous Community Development Block Grant (CDBG) projects. Lenawee County maintains a dedicated internal team responsible for fiscal oversight, compliance monitoring, and coordination with funding agencies.</p> <p>To ensure effective administration and compliance with MSHDA CDBG requirements, Lenawee County will partner with a qualified third-party administrator. This third-party</p>				

	<p>entity will bring extensive experience in federal grants management, CDBG program delivery, and regulatory compliance. Their responsibilities will include day-to-day program administration, file maintenance, financial tracking, reporting, and liaison with MSHDA and other stakeholders.</p> <p>Lenawee County staff will maintain oversight of the program and work in close coordination with the third-party administrator to ensure that all program objectives, timelines, and compliance requirements are met. Lenawee County personnel involved include the Community Director Coordinator or designee, Finance Director or designee and other relevant department staff who will assist with project coordination and local support.</p> <p>Resumes or job descriptions for County staff involved in the program are attached, demonstrating relevant qualifications and capacity to manage the proposed activities.</p> <p><u>County Administrator</u> The County Administrator is the chief administrative officer and the chief financial officer of the county. The County Administrator develops, recommends, implements, and administers policies of the County Board of Commissioners relating to general county administration, including employee relations and labor negotiations, budgeting and financial management, facility and equipment management, and other internal services. Provide general staff assistance to the Board of Commissioners, advising of problems, needs and policy alternatives; act as a liaison between board and various elected officials. Directly supervises appointment county officials and immediate administrative staff.</p> <p><u>Finance Director</u> The Finance Director is a member of the management team and is responsible for planning and directing the financial operations of the County.</p> <p><u>Community Development Coordinator</u> The Community Development Coordinator designs, manages, and oversees community development relationships for Lenawee County Government. This person serves as liaison between community partners, organizations, Administrator Office and the Board of Commissioners. The Community Development Coordinator is responsible for managing relationships with community members, organizations, and relevant stakeholders; providing regular updates, and flagging potential challenges and opportunities within all County district.</p>
2	<p><u>Grant History</u> List all housing and community development grant awards received by the UGLG and/or its third-party administrator in the past five years, including all State awarded grants. Provide the status of each, such as:</p> <ul style="list-style-type: none"> a) Application Pending (include prospective CDBG applications) b) Approved

<ul style="list-style-type: none"> c) Monitoring d) Completed Successfully e) Completed with Findings 				
CDBG Housing Rehabilitation	MSHDA 2012	Single-family home rehabilitation for low-to-moderate income residents	Completed Successfully	Met all performance and compliance benchmarks
Public Amenities	MSHDA 2024	Gerber Park Inclusive Playground Equipment	Completed Successfully	Met all performance and compliance benchmarks
CDBG Housing Rehabilitation	MSHDA 2025	Letter of Intent Submitted and submission of full application by 9/17/2025	Application Pending	

3 Implementation Strategy
Describe what makes the UGLG uniquely positioned for successful implementation of the selected programs. Explain the planned approach to execution.

Lenawee County is uniquely positioned to successfully implement the proposed CDBG-funded housing rehabilitation program due to its prior experience, strong local partnerships, and a proven framework for compliance and project delivery.

Lenawee County has successfully administered multiple CDBG programs in previous years, including a housing rehabilitation program in partnership with Community Action Agency (CAA). These past projects were completed on time, within budget and in compliance with HUD and MSHDA requirements.

The County has staff, financial systems, procurement policies, and reporting procedures in place to manage federal funds effectively.

The County anticipates receiving over 150 applications from low- and moderate-income homeowners during the first outreach phase. From this applicant pool, 75 homes will be

selected for rehabilitation based on the following CDBG-compliant eligibility and prioritization criteria:

- Income Eligibility: All households must be verified as earning at or below 80% of Area Median Income (AMI) using HUD income limits and documentation standards.
- Ownership & Occupancy: Only owner-occupied, single-family residences will be eligible.
- Property Condition: Homes must require repairs that correct health, safety, code, or accessibility deficiencies.
- Environmental Clearance: Properties must pass an environmental review per 24 CFR Part 58 before work can begin.
- Prioritization Criteria (subject to availability of funding):
 - Seniors (62+) and individuals with disabilities
 - Households with children under 18
 - Properties in targeted neighborhoods or areas with high LMI concentration
 - First-time applicants who have not received prior CDBG housing assistance

Applicants who meet the criteria but are not selected in this program round will be added to a waitlist and may be considered if additional funding becomes available or in future grant cycles.

Program Execution Timeline

Phase 1: Start-Up and Outreach (Months 1–3)

- Finalize agreement with third-party administrator
- Develop and distribute application materials
- Host outreach events and accept applications
- Conduct income verifications and environmental reviews

Phase 2: Rehab Implementation (Months 4–24)

- Group homes into manageable batches (3–5 at a time)
- Create work scopes, bid projects, and assign contractors
- Monitor construction progress, ensure compliance with HQS
- Document all project files and report to MSHDA

Phase 3: Ongoing Monitoring and Reporting

- Monthly check in meetings between County and third-party administrators.
- Quarterly progress reports to MSHDA
- Internal audits of files and financials

	<ul style="list-style-type: none"> • End-of-project evaluation to guide future planning <p>The County will ensure a transparent and fair selection process in compliance with HUD's CDBG regulations, including non-discrimination under the Fair Housing Act and Section 504. Outreach materials will be made available in multiple languages as needed, and reasonable accommodations will be provided to persons with disabilities to ensure equitable access to the program.</p> <p>By combining Lenawee County's oversight with the third-party administrator's direct service capacity and trusted community presence, this program ensures a resident-focused, compliance-driven approach to improving housing conditions. Targeting repairs that increase safety and energy efficiency will not only preserve affordable housing but also build stronger, healthier neighborhoods.</p> <p>This structured, phased approach allows Lenawee County to stay on schedule while addressing compliance at every stage. By managing projects in manageable batches, Lenawee County ensures both quality and scalability.</p> <p>The County's deep understanding of local housing needs ensures that the program is responsive, equitable, and targeted. Prioritizing vulnerable populations such as seniors, people with disabilities, and low-income families ensures that CDBG funding will have maximum impact in reducing housing instability and improving quality of life.</p>
4	<p>Check each item and certify below that the UGLG:</p> <p><input checked="" type="checkbox"/> (a) Understands that all activities undertaken must meet the Federal/state/local code, whichever is stricter.</p> <p><input checked="" type="checkbox"/> (b) Understands that required zoning must be approved for Manufactured Housing, Infrastructure (Housing), Reconstruction, and Unoccupied Rental Rehabilitation activities, and specific sites/addresses must be pre-identified prior to UGLG application submission. No specific sites/addresses need to be pre-identified prior to UGLG submission for Homeowner Rehabilitation activities.</p> <p><input checked="" type="checkbox"/> (c) Understands that all activities must be completed, invoiced and all expenditures completed and processed with the MSHDA grants management system by the end of the Grant term. Invoices must be submitted at least quarterly.</p> <p><input checked="" type="checkbox"/> (d) Understands that this CDBG funding is not replacement funding; and can only serve as a matching resource for another state and/or federal Program with MSHDA pre-approval.</p> <p><input checked="" type="checkbox"/> (e) Understands that MSHDA reserves the right to reject any and all submissions, or parts thereof, or to waive any informality or defect in any submission if it is in the best interest of MSHDA and the State of Michigan. All submissions shall become the property of MSHDA. All submissions are considered public information and are subject to discovery under the Freedom of Information Act (FOIA). This submission is not a binding agreement and the notice of selection under this Notification does not guarantee project funding. No project expenses may be incurred, nor contracts signed, for any work that will occur after the application is submitted, unless MSHDA provides formal written authorization. Failure to obtain this approval may jeopardize grant funding.</p>

	<input checked="" type="checkbox"/> (f) Understands that the UGLG is required to be in compliance and good standing with MSHDA and all other State and Federal Agencies. <input checked="" type="checkbox"/> (g) Agrees to adhere to federal, state and local rules and regulations including, but not limited to, HUD, CDBG, MSHDA, MI Neighborhood, CHILL and CDBG Policy Manual, program rules, regulations, policies, procedures, Grant Agreement, reporting requirements, and the completion of closeout public hearing, monitoring, and grant closeout.
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G	COMPLIANCE REQUIREMENTS The following MSHDA CDBG Program Compliance Documents are required to be submitted with the CDBG Application or prior to receiving a Grant Agreement as indicated. Refer to the CDBG Policy Manual for details.
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MUST BE SUBMITTED WITH APPLICATION

1	<input type="checkbox"/> Proof of funding attached for total project costs, including all leverage/match funds. OR <input checked="" type="checkbox"/> Proof of funding not applicable. No leverage/match funds.
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2	<input checked="" type="checkbox"/> Public Hearing Documentation <table border="1" style="width: 100%;"> <tr> <td colspan="2" style="text-align: center;">MUST BE SUBMITTED WITH APPLICATION</td> </tr> <tr> <td style="width: 80%;"> <input type="checkbox"/> Proof of funding attached for total project costs, including all leverage/match funds. OR <input checked="" type="checkbox"/> Proof of funding not applicable. No leverage/match funds. </td> <td style="width: 20%;"></td> </tr> <tr> <td colspan="2"> <input checked="" type="checkbox"/> Public Hearing Documentation Purpose: To ensure public awareness and input regarding proposed CDBG-funded activities. Submission Requirements: <ul style="list-style-type: none"> a) Public Hearing Publication Affidavit and Public Hearing Meeting Minutes must be provided. b) Notice must be published in a local or applicable newspaper at least five calendar days before the hearing. The first day counted is the day after publication. Public Hearing Notice Must Include: <ul style="list-style-type: none"> a) Total available funding for the proposed project. b) Eligible activities and the estimated amount allocated for low- and moderate-income (LMI) households. </td> </tr> </table>	MUST BE SUBMITTED WITH APPLICATION		<input type="checkbox"/> Proof of funding attached for total project costs, including all leverage/match funds. OR <input checked="" type="checkbox"/> Proof of funding not applicable. No leverage/match funds.		<input checked="" type="checkbox"/> Public Hearing Documentation Purpose: To ensure public awareness and input regarding proposed CDBG-funded activities. Submission Requirements: <ul style="list-style-type: none"> a) Public Hearing Publication Affidavit and Public Hearing Meeting Minutes must be provided. b) Notice must be published in a local or applicable newspaper at least five calendar days before the hearing. The first day counted is the day after publication. Public Hearing Notice Must Include: <ul style="list-style-type: none"> a) Total available funding for the proposed project. b) Eligible activities and the estimated amount allocated for low- and moderate-income (LMI) households. 	
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	<p>c) Plans to minimize displacement and provide benefits to displaced persons, if applicable.</p> <p>d) Information on the UGLG’s performance in prior CDBG programs, if applicable.</p> <p>Refer to MSHDA CDBG Policy Manual Chapter 3 – Notice of Public Hearing (Sample 3-A).</p> <p>Proof of Public Notice: Applicants must submit an affidavit or a copy of the full newspaper page showing the publication date and notice details.</p> <p>Public Hearing Purpose:</p> <ul style="list-style-type: none"> a) Inform citizens of project objectives, activities, locations, and funding allocation. b) Provide the opportunity for public review and comments on the application. c) Include the anticipated application submission date and details on where and when the application can be reviewed. <p>Submission Timeline:</p> <ul style="list-style-type: none"> a) Draft meeting minutes may be submitted with the application. b) Once approved, public hearing minutes and an attendance roster must be submitted to MSHDA before grant award.
3	<p><input type="checkbox"/> CDBG Authorizing Resolution</p> <p>Purpose: To designate the authorized official responsible for the CDBG application, grant administration, and NEPA Environmental Review Certifying Officer.</p> <p>Submission Requirements:</p> <ul style="list-style-type: none"> • Authorizing Resolution (Form 2-A from Chapter 2 of the MSHDA CDBG Policy Manual) must be submitted with the application. • The highest elected official is responsible for signing grant documents unless delegated through the resolution. <p>Instructions:</p> <p>Grantees are required to submit an Authorizing Resolution (2-A) designating their authorized official. By default, the highest elected official assumes responsibility of the grant application process, in addition to signing the grant agreement, oversight of grant activities, and signing of grant documents, pay requests, etc. However, these responsibilities may be delegated to another official (elected or hired) through the use of the Authorizing Resolution. The Authorizing Resolution should be completed prior to</p>

	<p>submitting the application or signing grant related documents and is often in tandem with the public hearing for the overview of the proposed project.</p> <p>At time of passing the Authorizing Resolution, the UGLG may also designate the Certifying Officer for the NEPA Environmental Review. Please review instructions in the Environmental Review chapter.</p> <p>An adopted CDBG Authorizing Resolution will, at a minimum, contain the following:</p> <ol style="list-style-type: none"> 1. Identification of the proposed project. 2. Identification of the funding request and the commitment of the UGLG’s matching funds. 3. Statement that the proposed project is consistent with the UGLG’s community development plan as described in the Application. 4. Statement that all activities will be taken for the purpose of providing and/or improving permanent residential structures, which upon completion: <ol style="list-style-type: none"> a. 100% will be occupied by low- or moderate-income households [for projects that include Homeowner Rehabilitation, Reconstruction, and Manufactured Housing activities] AND/OR b. 51% or more will be occupied by low- or moderate- income households [for projects that include Housing Infrastructure and Unoccupied Rental Rehabilitation activities] 5. Statement that no project costs (CDBG and non-CDBG) will be incurred prior to a formal grant award, completion of the environmental review procedures and formal, written authorization to incur costs has been provided by MSHDA. 6. Local authorization to submit the Michigan CDBG Application. 7. Identification, by title, of the UGLGs authorized person to sign the Application and all attachments. 8. Identification, by title, of the UGLGs authorized person to sign the Grant Agreement and all amendments. 9. Identification, by title, of the UGLGs authorized person to sign Payment Requests. 10. Identification, by title, of the UGLGs authorized person as the National Environmental Policy Act (NEPA) Environmental Review Certifying Officer. <p>An Authorizing Resolution template is available in the CDBG Policy Manual Chapter 2 – Application and Award Process (2-A Authorizing Resolution).</p>
4	<p>Procurement of Third-party Administrator</p> <p><input checked="" type="checkbox"/> Applicable <input type="checkbox"/> Not Applicable</p> <p>If applicable, explain the process to be used for procuring the third-party administrator.</p> <p>Lenawee County’s procurement policy can be found here:</p> <p>https://www.lenawee.mi.us/DocumentCenter/View/1872/Federal-Awards-Administration</p>

The following is the Procurement Policy:

Uniform Guidance Compliance Supplement - Procurement, Suspension and Debarment

Source of Governing Requirements – The requirements for procurement are contained in the Uniform Guidance, program legislation, Federal awarding agency regulations, and the terms and conditions of the award.

The requirements for suspension and debarment are contained OMB guidance in 2 CFR part 180, which implements Executive Orders 12549 and 12689, Debarment and Suspension; Federal agency regulations in 2 CFR implementing the OMB guidance; the Uniform Guidance; program legislation; Federal awarding agency regulations; and the terms and conditions of the award.

In order to ensure compliance with these requirements, Lenawee County has implemented the following policies and procedures:

1. Purchasing and procurement related to Federal grants will be subject to the general policies and procedures of the County. (See County Bidding Policy.) Which is attached under the Policy attached.

2. Contract files will document the significant history of procurement, including rationale for the method of procurement, selection of the contract type, contractor selection or rejection, and the basis of contract price. POL 2024-020 Federal Awards Policy Date of Adoption: 12/2006 Reviewed: 01/2018, 11/2024

3. Procurement will provide for full and open competition.

4. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The officers, employees, and agents can neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. If the financial interest is not substantial or the gift is an unsolicited item of nominal value, no further action will be taken. Disciplinary actions will be applied for violations of such standards otherwise.

5. The County will avoid acquisition of unnecessary or duplicative items. Consideration will be given to consolidating or breaking out procurements to obtain a more economical purchase. Where appropriate, an analysis will be made of lease versus purchase alternatives, and any other appropriate analysis to determine the most economical approach. The County will also analyze other means, as described in §200.318 of the Uniform Guidance, in order to ensure appropriate and economic acquisitions.

6. The Government is prohibited from contracting with or making subawards under covered transactions suspended, debarred parties, or whose principals are suspended or debarred. “Covered transactions” include those procurement contracts for goods and services awarded under a non-procurement transaction (i.e., grant or cooperative

agreement) expected to equal or exceed \$20,000 or meet certain other specified criteria. All no procurement transactions (i.e., subawards to subrecipients), irrespective of award amount, are considered covered transactions.

7. Lenawee County will include a suspension/debarment clause in all written contracts in which the vendor/contractor will certify it is not suspended or debarred. The contract will also contain language requiring the vendor/contractor to notify the Government immediately upon becoming suspended or debarred. This will serve as adequate documentation as long as the contract remains in effect.

8. The Program Director or designee will be responsible for running a year-to-date transaction report from the County's accounting system. Any vendor with accumulated transactions equaling or exceeding \$20,000 that is not subject to a written contract including a suspension/debarment clause or for which a signed statement or suspension or debarment is not on file will be subject to additional procedures. The Program Director or designee will check the Excluded Parties List System (EPLS) maintained by the General Services Administration (GSA) for the vendor's name. A potential match will be followed-up on immediately. Each vendor searched on EPLS will be initialed on the vendor transaction report and the report will POL 2024-020 Federal Awards Policy Date of Adoption: 12/2006 Reviewed: 01/2018, 11/2024 be signed and dated on the first or last page. The vendor transaction report will be retained as evidence of the control.

9. If a vendor is found to be suspended or debarred, the County will immediately cease to do business with this vendor.

10. Executed contracts and signed quarterly vendor transaction history reports will be retained and filed by the Program Director.

Bidding Policy

Date of Adoption: 7/12/2000

Amendments: 1/09, 7/11, 6/17

Sealed Bids: Competitive bids shall be solicited for all contracts in which the total County obligation is anticipated to be \$50,000 or more. The requirement for competitive bids shall not apply to intergovernmental contracts. All bid proposals shall be reviewed and approved by the Administrator's Office prior to distribution.

Bid and Performance Bonds: The Administrator's Office shall determine the necessity of a bid or performance bond for each bidding process. For construction projects in excess of \$100,000, a performance bond of 100% of the project cost shall be required. The responsible committee is authorized to require performance bonds for projects less than \$100,000 if it is deemed necessary. Performance and bid bond requirements may be waived, as necessary, at the discretion of the responsible committee.

Quotes and estimates: For goods and services anticipated to cost less than \$20,000, County departments, boards, and committees are authorized to determine the best method of procurement including the bidding process, quotes, and estimates. Evaluation and selection of the appropriate method are to be handled on a case-by-case basis.

Local preference: Local vendors are encouraged to submit proposals on bid requests to provide goods and/or services to Lenawee County government. The increase in economic activity through local jobs, tax revenues, and expenditures, resulting from contracting with local vendors is evaluated in the cost consideration. Other

	<p>considerations include quality, service, and time constraints. The lowest cost proposal does not necessarily result in the award of the proposal, because of other factors also being evaluated.</p> <p><u>Use of another organization's bidding procedures:</u> It will be an acceptable practice for any Lenawee County agency or department to utilize a third party to conduct bidding for goods and/or services upon advanced approval of the County Administrator. Documentation relating to the third party's bidding policy must be submitted with the request for approval. POL#2023-003 Lenawee County Board of Commissioners Page 2 of 2.</p> <p><u>Authority to award bids:</u> The Board of Commissioners may assign authority to award a bid to a named county official otherwise the Board reserves to itself the authority to award the bid.</p> <p><u>Ability to override:</u> The Board of Commissioners may waive this bidding policy by a 2/3 majority vote if such action is determined to be in the best interests of the County.</p> <p>PASSED BY ROLL CALL VOTE of the Lenawee County Board of Commissioners at a regular meeting held Wednesday, June 14, 2023, in the Old Courthouse, Adrian, Michigan. James E. Van Doren, Chair; Roxann Holloway, County Clerk</p>
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NOTE: THE FOLLOWING ITEMS ARE SUBMITTED AFTER APPLICATION APPROVAL

MUST BE SUBMITTED PRIOR TO GRANT AGREEMENT EXECUTION

5	<p>Annual Profile Review. IGX Grant Management System instructions will be provided upon award. Complete and return 2-E Authorized Signature Designation Review CDBG Policy Manual Chapter 2 – Application and Award Process</p>
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MUST BE SUBMITTED PRIOR TO INCURRING ANY PROJECT COSTS (CDBG or non-CDBG)

6	<p>NEPA Environmental Review. Review CDBG Policy Manual Chapter 7 – Environmental Review</p>
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MUST BE SUBMITTED WITHIN 60 DAYS OF GRANT AGREEMENT EXECUTION

7	<p>Local Program Guidelines. Complete the Program Guidelines TEMPLATE Review CDBG Policy Manual Chapter 2 – Application and Award Process (2-C Program Guidelines)</p>
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H	CERTIFICATION BY THE UGLG	<input checked="" type="checkbox"/> I have read and certify Section H below.
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	<p>The UGLG states that the person identified in the Authorizing Resolution certifies the following:</p> <ol style="list-style-type: none"> 1. Possesses legal authority to submit a grant application.
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2. Shall comply with 570.486(a) Citizen Participation Requirements of a Unit of General Local Government, including:
- a. Provide for and encourage citizen participation, particularly by low- and moderate-income persons who reside in slum or blighted areas and areas in which CDBG funds are proposed to be used;
 - b. Ensure that citizens will be given reasonable and timely access to local meetings, information, and records relating to the unit of local government's proposed and actual use of CDBG funds;
 - c. Furnish citizens information, including but not limited to:
 - i. The amount of CDBG funds expected to be made available for the current fiscal year (including the grant and anticipated program income).
 - ii. The range of activities that may be undertaken with the CDBG funds.
 - iii. The estimated amount of the CDBG funds proposed to be used for activities that will meet the national objective of benefit to low- and moderate-income persons; and
 - iv. The proposed CDBG activities likely to result in displacement and the unit of general local government's anti-displacement and relocation plans required under §570.488.
 - d. Provide technical assistance to groups representative of persons of low and moderate income that request assistance in developing proposals in accordance with the procedures developed by the state. Such assistance need not include providing funds to such groups.
 - e. Provide for a minimum of two public hearings, each at a different stage of the program, for the purpose of obtaining citizens' views and responding to proposals and questions. Together the hearings must cover community development and housing needs, development of proposed activities and a review of program performance. The public hearings to cover community development and housing needs must be held before submission of an application to the state. There must be reasonable notice of the hearings and they must be held at times and locations convenient to potential or actual beneficiaries, with accommodations for the handicapped. Public hearings shall be conducted in a manner to meet the needs of non-English speaking residents where a significant number of non-English speaking residents can reasonably be expected to participate.
 - f. Provide citizens with reasonable advance notice of, and opportunity to comment on, proposed activities in an application to the state and, for grants already made, activities which are proposed to be added, deleted or substantially changed from the unit of general local government's application

to the state. Substantially changed means changes made in terms of purpose, scope, location or beneficiaries as defined by criteria established by the state.

- g. Provide citizens the address, phone number, and times for submitting complaints and grievances, and provide timely written answers to written complaints and grievances, within 15 working days where practicable.

3. Has in a timely manner:

- a. Furnished its citizens information concerning the amount of funds available and being applied for, and the proposed community development and housing activities to be undertaken, including the estimated amount proposed to be used for activities that will benefit persons of low and moderate income and the plans for minimizing displacement of persons due to proposed activities and for assisting persons displaced.
- b. Published public notice in such manner to afford citizens an opportunity to examine and submit comments on the proposed application and community development and housing activities.
- c. Held one or more public hearings to obtain the views of citizens on the proposed application and community development and housing needs; and
- d. Made the proposed application available to the public.

4. Will conduct and administer the grant in conformity with Public Law 88-352 and Public Law 90-284 and will affirmatively further fair housing.

5. Has developed the proposed application so as to give maximum feasible priority to activities which will benefit low- and moderate-income families or aid to the prevention or elimination of slum or blight; or to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to health or welfare of the community where other financial resources are not available to meet such needs.

6. Has developed a community development plan or community development narrative that identifies community development and housing needs and specifies both short- and long-term community development objectives that have been developed in accordance with the primary objective and requirements of the Title I Housing and Community Development Act of 1974, as amended;

7. Will not attempt to recover any capital costs of public improvements assisted in whole or in part with Title I 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, unless (A) Title I funds are used to pay the proportion of such fee or assessment that related to capital costs of such public improvement that are financed from revenue

	<p>sources other than Title I funds; or (B) for purposes of assessing any amounts against properties owned and occupied by persons of low and moderate income who are not persons of very low income, and (name of local unit) certifies that it lacks sufficient Title I funds to comply with the requirements of clause (A);</p> <p>8. Will adopt a policy of prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such nonviolent civil rights demonstrations within its jurisdictions.</p> <p>9. No federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned 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 entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any federal contract, grant or cooperative agreement;</p> <p>10. 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 a federal contract, grant, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions;</p> <p>11. The undersigned shall require that the language of this certification be included in the award documents for all sub-awards at all tiers (including subcontracts, sub-grants, and contracts under grants and cooperative agreements) and that all sub-recipients shall certify and disclose accordingly.</p> <p>12. Will comply with other provisions of Title I of the Housing and Community Development Act of 1987, as amended, and with other applicable laws.</p>
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I	<p>STATEMENT OF ASSURANCES <input checked="" type="checkbox"/> I have read Section I and assure the following:</p>
	<p>The UGLG states that the person identified in the Authorizing Resolution assures the following:</p> <ol style="list-style-type: none"> 1. Compliance with financial management and audit requirements in 2 CFR Part 200; Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; Final Rule. 2. Compliance with Civil Rights and Equal Opportunity statutes as set forth in Title I of the Civil Rights Act of 1964 (Public Law 88-352), Title VIII of the Civil Rights Act of

	<p>1968 (Public Law 90-284), the Michigan Civil Rights Act 453 of 1976, the Michigan Fair Employment Practices Act (MCL 423, 301-423, 311), related statutes and implementing rules and regulations.</p> <ol style="list-style-type: none"> 3. Compliance with Labor Standards statutes as set forth in the Davis-Bacon Fair Labor Standards Act (40 U.S.C. 276a-276a-5), related statutes and implementing rules and regulations. 4. Compliance with Lead Based Paint Poisoning Prevention Act (42 U.S.C. 4831). 5. Compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 U.S.C. 4630) and implementing regulations. 6. Compliance with Section 504 of the Rehabilitation Act of 1973, as amended, and implementing rules and regulations 24 CFR Part 8. 7. Compliance with the Citizen Participation Plan (24 CFR Part 570.486 (A)) and implementing regulations. 8. Authorized state officials and representatives will have access to all books, accounts, records, reports, files, and other papers, things, or property pertaining to the project to make audits, examinations, excerpts, and transcripts; each contract or subcontract also shall provide for such success to relevant data and records pertaining to the development and implementation of the project. <p>The UGLG agrees to assume all the responsibilities for environmental review, decision making, and action as specified and required under the National Environmental Policy Act of 1969 (42 U.S.C. 4321) and Section 104 (f) of Title I of the Housing and Community Development Act and implementing regulations 24 CFR Part 58.</p>
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J	<p>CHOICE LIMITING ACTION ACKNOWLEDGEMENT</p> <p><input checked="" type="checkbox"/> I acknowledge that engaging in choice-limiting activities prior to submitting the Request for Release of Funds (RROF) and Certification and receiving authorization, may jeopardize this project’s eligibility for funding. Such actions may result in disqualification from CDBG funding and/or require repayment of CDBG funds already expended.</p>
	<p>In accordance with 24 CFR Part 58, neither the recipient nor any participant in the project—including public or private nonprofit organizations, for-profit entities, or their contractors—may commit or expend federal or non-federal project funds prior to approval of the Environmental Review Request for Release of Funds (RROF) and Certification, and subsequent authorization from MSHDA, unless explicitly allowed under 24 CFR Part 58. Examples of prohibited choice-limiting actions include, but are not limited to:</p>

	<ul style="list-style-type: none"> • Acquisition of land or property • Demolition activities • Closing on loans • Signing contracts • Beginning construction or rehabilitation work
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K	CERTIFICATION BY AUTHORIZED SIGNATORY	
	<p>The individual signing below is either the highest elected official or has been duly authorized through an Authorized Resolution. By signing, they certify that:</p> <ol style="list-style-type: none"> 1. All required fields in this application have been completed and reviewed. 2. The Certifications and Assurances included herein have been reviewed and acknowledged. 3. No project costs (CDBG and non-CDBG) will be incurred prior to a formal grant award, and written authorization to incur costs has been provided by MSHDA. 4. To the best of their knowledge, the information provided in this application is accurate and current. 5. The UGLG agrees to comply with all applicable HUD, CDBG, and MSHDA rules, regulations, policies, procedures, and reporting requirements. 6. All entities involved in the implementation of the proposed project will also comply with these rules and regulations throughout the grant administration process. 	
	SIGNATURE	
1	NAME	
2	TITLE	
3	PHONE	
4	DATE	