OAKLAND COUNTY MICHIGAN
NEIGHBORHOOD & HOUSING DEVELOPMENT

2026-2030

CONSOLIDATED PLAN

AND 2026-2027

ANNUAL ACTION PLAN

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OAKLAND COUNTY MICHIGAN
NEIGHBORHOOD & HOUSING DEVELOPMENT

2026-2030

Executive Summary

ES-05 EXECUTIVE SUMMARY - 24 CFR 91.200(C), 91.220(B)

Introduction

Every five years, Oakland County must prepare a strategic plan (known as the Consolidated Plan) which governs the use of federal housing and community development grant funds that it receives from the United States Department of Housing and Urban Development (HUD). When preparing a Consolidated Plan, grantees must assess the needs and issues in their jurisdictions as a part of their preparation of these documents.

The grant funds received from HUD by Oakland County that are covered in the Consolidated Plan include:

- Community Development Block Grant (CDBG) Program
- Home Investment Partnerships (HOME) Program
- Emergency Solutions Grant (ESG) Program

Oakland County serves as the lead agency for the HOME Consortium which is comprised of the Urban County of Oakland, Farmington Hills, Royal Oak, and Southfield; the County additionally serves as the lead agency for administration of the CDBG and ESG programs on behalf of 52 participating communities including: the Cities of Auburn Hills, Berkley, Birmingham, Bloomfield Hills, Clarkston, Clawson, Farmington, Ferndale, Hazel Park, Huntington Woods, Keego Harbor, Lathrup Village, Madison Heights, Northville, Novi, Oak Park, Orchard Lake Village, Pleasant Ridge, Rochester, Rochester Hills, South Lyon, Sylvan Lake, Troy, Walled Lake, Wixom, the Townships of Addison, Bloomfield, Brandon, Commerce, Groveland, Highland, Holly, Independence, Lyon, Milford, Oakland, Orion, Oxford, Rose, Royal Oak, Springfield, West Bloomfield, White Lake and the Villages of Beverly Hills, Franklin, Holly, Lake Orion, Leonard, Milford, Ortonville, Oxford and Wolverine Lake. Note: the City of Pontiac now administers its own funding and is no longer a participating community for Oakland County.

The Consolidated Plan identifies the programmatic goals and activities for the HOME program for the Oakland County HOME Consortium, the CDBG and ESG goals for Oakland County and its participating communities and the CDBG goals for Consortium member communities for the period of July 1, 2026 - June 30, 2030.

Oakland County must also submit to HUD separate Annual Action Plans for each of the five years during the Consolidated Plan period. The Annual Action Plans serve as the County's yearly applications to HUD that are required for the County to receive the annual allocations from the three grant programs. These grants from HUD are known as

Entitlement Grant Programs because communities receive the funds every year if they meet program requirements and criteria associated with each of the three grants.

Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

When preparing a Consolidated Plan, grantees must assess the needs in their jurisdictions as a key part of the process. To inform development of priorities and goals over the next five years, the Consolidated Plan's Needs Assessment discusses housing, community development, and economic development needs in the county. The Needs Assessment relies on data from the US Census, 2019-2023 5-Year American Community Survey (ACS), and a special tabulation of ACS data known as Comprehensive Housing Affordability Strategy (CHAS) data that estimates the number of households with one or more housing needs. Local data regarding homelessness and assisted living is included. Finally, public input gathered through interviews, focus groups, meetings, and the community survey are coupled with data analysis to identify priority needs related to affordable housing, homelessness, assisted housing, community development, and economic development in Oakland County.

Priority Objectives

Priorities identified during the development of Oakland County's 2026-2030 Five-Year Plan include:

- Increase and improve affordable housing options
- Increase and improve homeless service, shelter, and prevention efforts
- Create and sustain a suitable living environment through infrastructure and public facility improvements
- Provide public services to expand economic opportunity, improve safety, enhance food access, and provide other assistance for low- and moderate-income households, seniors, people with disabilities, and other eligible groups
- Administration of funding and projects

Evaluation of past performance

As required by HUD, each year Oakland County prepares a detailed Annual Action Plan and Consolidated Annual Performance and Evaluation Report (CAPER) for its HUD-funded program. The Annual Action Plan and CAPER are submitted to HUD and posted on the City's website after review and approval by HUD. The County's most recent CAPER shows that Oakland County met or exceeded its program goals with the following programs:

- Construction of new affordable rental units: goal – 4 units constructed; actual – 4 units constructed
- Community engagement of low/mod income households: goal – 75 households engaged; actual – 75 households engaged
- Homelessness prevention: goal – 20 persons assisted; actual – 88 persons assisted
- Housing code enforcement and foreclosed property care for the purpose of community engagement: goal – 300 housing units; actual – 360 housing units
- Anti-discrimination services for low/mod income households: goal – 700 households assisted; actual – 983 households assisted
- Public facility or infrastructure activities for low/moderate income housing benefit: goal – 2000 persons assisted; actual – 20,122 persons assisted
- Homeless overnight shelter: goal – 280 persons assisted; actual – 1583 persons assisted

Oakland County did not meet its goals with the following programs:

- Rental unit rehabilitation: goal – 125 units rehabilitated; actual – 0 units rehabilitated (units currently under construction)
- Homeowner housing rehabilitation: goal – 225 units rehabilitated; actual – 161 units rehabilitated
- Public facility/infrastructure activities other than for low/mod income housing benefits: goal – 300,000 persons assisted; actual – 238,113 persons assisted
- Homelessness prevention: goal – 100 persons assisted; actual – 99 persons assisted
- Building demolition: goal – 12 units demolished; actual – 9 units demolished
- Housing code enforcement and foreclosed property care for the purpose of public facilities and services: goal – 36,000 housing units; actual – 9,701 housing units

Summary of citizen participation process and consultation process

An important component of the research process for the Consolidated Plan involved gathering input regarding fair and affordable housing conditions and needs in Oakland County. The County used a variety of public engagement approaches with residents and other stakeholders, including public meetings, focus groups, stakeholder interviews and a community survey.

Public Meetings

Oakland County collaborated with Mosaic Community Planning to host a total of three (3) open community meetings on the evenings of December 9, 10, and 11, 2025. Meetings included a presentation of the Consolidated Plan goals and an overview of the planning process and discussion of housing and community needs. A total of 9 community members attended a meeting.

Pop-up events

Mosaic Community Planning also held four (4) informal pop-up events in Oakland County during the week of December 8-12. These events included engaging passersby on the Consolidated Planning process, brief discussion prompts, and an invitation to complete the survey. A total of 43 community members were engaged at pop-up events.

Focus Groups

Three (3) focus groups were held in December 2025 and January 2026 – one with staff from the Community Housing Network, one with staff from the Oakland County Harm Reduction Office, and one with the Oakland County Citizen Advisory Committee. All groups indicated major homelessness and service needs within the County, which was previously identified by stakeholders as a major area of concern.

Community Insight Interviews

One-on-one community insight interviews were conducted by phone during November and December 2025. Stakeholders and service providers with important perspectives were selected by the County and invited to participate in 30-minute phone interviews about housing and community needs within Oakland County. A total of 15 stakeholders provided input via phone interview.

Technical Consultations

In addition to broad stakeholder interviews, one-on-one technical consultations were also conducted via phone in order to fulfill specific HUD consultation requirements. A total of six (6) technical consultations were completed in the areas of: Public Land and Water, Climate Resiliency, Continuum of Care/PHA, Housing Developers, School District, and Workforce Development. Additionally, the Michigan High Speed Internet Office provided information via email in the areas of Broadband Providers and Organizations Providing Internet/Technology Access. Finally, the Oakland County Office of Emergency Management was invited to participate in a technical consultation but did not respond; however, the department's current Hazard Mitigation Plan was consulted for information in this area.

Community Survey

Oakland County conducted an extensive public housing and community needs survey in summer 2025. Respondents were asked for their feedback on various housing, public facility, and public service, and homelessness needs. Over 1,500 community members provided feedback via this survey.

Summary of public comments

Oakland County held a 30-day comment period and 2 public hearings to receive input from residents and stakeholders on the draft Consolidated Plan prior to approval by the Board of Commissioners and submission to HUD.

Below is a list of feedback received from members of the Board of Commissioners appointed Citizen Advisory Council:

1. Funding Stability: Mr. Gray noted that despite early legislative concerns about the "HOME" program, federal funding remains level for the upcoming cycle.
2. Fiduciary Roles: A distinction was made regarding the City of Southfield; while it manages its own CDBG funds, Oakland County acts as the fiduciary pass-through for Southfield's "HOME" funds.
3. Infrastructure Metrics: Member Henry questioned the high number of residents served (30,000) relative to the budget.
4. Oakland County Consultant, Mr. Gray explained that infrastructure impact is measured by the total population within the census block of a project (e.g., a new sidewalk).
5. Member Henry- questioned if there is flexibility in administrative fees 20%
6. Oakland County Consultant, Mr. Gray advised the administrative fee of 20% is a fixed amount of the allocation
7. Member Henry- Questioned how program income comes back to the county
8. Khadija Walker- Fobbs- Program income comes back to the county by way of Home Improvement Program homes that sell. The amount of the Home Improvement Loan is paid back.

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

All public comments were accepted and taken into consideration in preparing the Consolidated Plan.

Summary

During the development of the Consolidated Plan, a set of priority needs were identified. These priorities include:

- Increase and improve affordable housing options
- Increase and improve homeless service, shelter, and prevention efforts
- Create and sustain a suitable living environment through infrastructure and public facility improvements
- Provide public services to expand economic opportunity, improve safety, enhance food access, and provide other assistance for low- and moderate-income households, seniors, people with disabilities, and other eligible groups
- Administration of funding and projects

The Consolidated Plan also contains goals, measurable objectives, and implementation actions for each of the plan's elements. Priority needs, goals, objectives, and implementation actions were all derived from a combination of public input and data analysis, as described in the following sections.

OAKLAND COUNTY MICHIGAN
NEIGHBORHOOD & HOUSING DEVELOPMENT

2026-2030

The Process

PR-05 LEAD & RESPONSIBLE AGENCIES 24 CFR 91.200(B)

Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

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

TABLE 1 – RESPONSIBLE AGENCIES

Agency Role	Name	Department/Agency
CDBG Administrator	OAKLAND COUNTY	HHS/Neighborhood & Housing Development Division
HOME Administrator	OAKLAND COUNTY	HHS/Neighborhood & Housing Development Division
ESG Administrator	OAKLAND COUNTY	HHS/Neighborhood & Housing Development Division

Narrative

The Oakland County Board of Commissioners (BOC) designated the Department of Health and Human Services Oakland County Neighborhood & Housing Development Division as the lead agency responsible for administering its CDBG, HOME and ESG programs including the development of the Con Plan, Annual Action Plan and the Consolidated Annual Performance and Evaluation Report. The Division serves as the lead agency for administration of the CDBG and ESG programs on behalf of 52 participating communities including: the Cities of Auburn Hills, Berkley, Birmingham, Bloomfield Hills, Clarkston, Clawson, Farmington, Ferndale, Hazel Park, Huntington Woods, Keego Harbor, Lathrup Village, Madison Heights, Northville, Novi, Oak Park, Orchard Lake Village, Pleasant Ridge, Rochester, Rochester Hills, South Lyon, Sylvan Lake, Troy, Walled Lake, Wixom, the Townships of Addison, Bloomfield, Brandon, Commerce, Groveland, Highland, Holly, Independence, Lyon, Milford, Oakland, Orion, Oxford, Rose, Royal Oak, Springfield, West Bloomfield, White Lake and the Villages of Beverly Hills, Franklin, Holly, Lake Orion, Leonard, Milford, Ortonville, Oxford and Wolverine Lake.

The Neighborhood & Housing Development Division has a long and successful history in federal program administration, works with various partners and has the capacity to serve as the lead agency for the Oakland County HOME Consortium. The Consortium member communities include Oakland County, Farmington Hills, Royal Oak, and Southfield. All the municipalities are eligible to receive and administer HUD funds and have established housing and community development programs. All members work in concert and with partners to extend program efficiency, scope and reach. Partnerships include housing developers, public housing commissions, service providers, homeless advocates and for profit and non-profit institutions.

Consolidated Plan Public Contact Information

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PR-10 CONSULTATION – 91.100, 91.110, 91.200(B), 91.300(B), 91.215(I) AND 91.315(I)

Introduction

Oakland County conducted an array of both virtual and in-person public engagement opportunities to inform the Consolidated Plan's goals and priorities. In November and December 2025, the County partnered with Mosaic Community Planning to conduct one-on-one community insight interviews with service providers and stakeholders, as well as technical consultations with specific providers who held relevant insight to specific areas of the Consolidated Plan. In December 2025, Mosaic held three in-person public community meetings and four informal informational pop-up events, engaging a total of 52 community members. Additionally, three virtual focus groups were held in December 2025 and January 2026 with health homeless service providers and with the County's Citizen Advisory Committee to better understand needs in the County. Finally, the County held a public community survey in summer 2025 in order to assess housing and community needs, which received nearly 1,600 responses.

On March 17, 2026, Oakland County along with the Citizen's Advisory Council held a public hearing at 4:00 p.m. to hear public comments on and approve the draft Consolidated Plan prior to approval by the Board of Commissioners and submission to HUD. The comment period ran from March 17 to April 21, 2026. The County received no written comments on the plan.

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

The Alliance for Housing, which serves as Oakland County's Continuum of Care (CoC), plays a crucial role in enhancing coordination between public and private providers and agencies. The Alliance currently maintains a roster of 37 different organizations and service providers who participate in a jurisdiction-wide coordinated services agreement, including public and assisted housing providers and public and private health, mental health, and other service agencies.

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

Two focus groups were held with service providers in Oakland County in order to assess and address the needs of homeless persons – one with Oakland County Harm Reduction staff and one with Community Housing network staff. Additionally, the Continuum of Care (Alliance for Housing) was directly involved and referenced via a one-on-one phone interview with their executive director and the inclusion of their annually published report data in relevant sections of the Consolidated Plan. Other organizations interviewed with important perspectives on homelessness included South Oakland Citizens for the Homeless (Welcome Inn), Lighthouse, Ferncare Free Clinic, and the Affirmations Community Center.

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

Oakland County consulted and directly involved the Continuum of Care, Alliance for Housing, by conducting a one-on-one interview with the Alliance's executive director in order to better understand needs. Additionally, data from the Alliance's annual report is included in relevant sections of this Consolidated Plan.

Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

TABLE 2 – AGENCIES, GROUPS, ORGANIZATIONS WHO PARTICIPATED

Agency/Group/Organization	Agency/Group/ Organization Type	What section of the Plan was addressed by Consultation?	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?
Affirmations Community Center	Services – Health Services – Mental Health Services – Narrowing the Digital Divide	Non-Homeless Special Needs	Phone interview; Oakland County will continue to invite the organization to participate in consultation opportunities.
Alliance for Housing	CoC	Homeless Needs Assessment	Executive director of agency was interviewed via phone; data from agency's annual report is presented below. Oakland County will continue to coordinate with the Alliance for Housing as the jurisdiction's CoC.
Centro Multicultural La	Services – Health	Housing Needs Assessment	Phone interview; Oakland County will continue to invite

Familia	Services – Mental Health Services – Education Services – Victims of Domestic Violence	Non-Homeless Special Needs Anti-Poverty Strategy	the organization to participate in consultation opportunities.
Farmington Hills Planning and Community Development	Other Government - Local	Housing Needs Assessment Market Analysis	Phone interview; Oakland County will continue to invite the City to participate in consultation opportunities.
Gary Bernstein Community Health Clinic	Services – Health	Non-Homeless Special Needs Anti-Poverty Strategy	Phone interview; Oakland County will continue to invite the organization to participate in consultation opportunities.
Lighthouse	Services – Homeless Services - Housing	Homeless Needs Assessment	Phone interview; Oakland County will continue to invite the organization to participate in consultation opportunities.
Micah 6 Community	Services – Children Services – Education	Housing Needs Assessment Non-Homeless Special Needs Anti-Poverty Strategy	Phone interview; Oakland County will continue to invite the organization to participate in consultation opportunities.
Michigan High Speed Internet	Other Government –	Non-Homeless Special Needs	Email consultation; Oakland

Office	State Services – Broadband Services – Narrowing the Digital Divide	Economic Development Anti-Poverty Strategy	County will continue to consult on relevant issues.
Oakland County Citizen Advisory Committee	Services – Employment Services – Education Services – Children Services - Health	Housing Needs Assessment Non-Homeless Special Needs Economic Development Anti-Poverty Strategy	Focus group; Oakland County will continue to invite the organization to participate in consultation opportunities.
Oakland County Emergency Management	Other Government – County Agency – Emergency Management	Non-Homeless Special Needs	Invited to participate in phone interview; Oakland County will continue to invite the organization to participate in consultation opportunities.
Oakland County Land Bank Authority	Other Government – County Agency – Public Land Management	Housing Need Assessment Market Analysis	Phone interview; Oakland County will continue to invite the organization to participate in consultation opportunities.
Oakland County Neighborhood and Housing	Other Government – County	Housing Need Assessment	Lead agency

Development Department		Homeless Needs Assessment Market Analysis Economic Development Anti-Poverty Strategy	
Oakland County Office of Sustainability	Other Government – County Agency – Climate Resiliency	Hazard Mitigation	Phone interview; Oakland County will continue to invite the organization to participate in consultation opportunities.
Oakland County Planning Department	Other Government – County Agency – Planning	Housing Need Assessment Homeless Needs Assessment Market Analysis Economic Development	Phone interview; Oakland County will continue to invite the organization to participate in consultation opportunities.
Oakland County Transit	Other Government – County	Non-Homeless Special Needs Anti-Poverty Strategy	Phone interview; Oakland County will continue to invite the organization to participate in consultation opportunities.
Oakland County Workforce Development	Other Government – County Agency – Workforce Development	Market Analysis Anti-Poverty Strategy Economic Development	Phone interview; Oakland County will continue to invite the organization to participate in consultation opportunities.

Oakland Livingston Human Service Agency (OLHSA)	Services – Employment Services – Education Services – Health Services – Homeless Services - Housing	Housing Need Assessment Homeless Needs Assessment Non-Homeless Special Needs Anti-Poverty Strategy	Phone interview; Oakland County will continue to invite the organization to participate in consultation opportunities.
Oakland Schools	Services – Children Services – Education	Non-Homeless Special Needs Anti-Poverty Strategy	Phone interview; Oakland County will continue to invite the organization to participate in consultation opportunities.
Rochester Housing Solutions	Services – Housing	Housing Need Assessment Non-Homeless Special Needs Anti-Poverty Strategy	Phone interview; Oakland County will continue to invite the organization to participate in consultation opportunities.
South Oakland Citizens for the Homeless (SOCH)	Services - Homeless	Homeless Needs Assessment	Phone interview; Oakland County will continue to invite the organization to participate in consultation opportunities.
We Preserve Michigan	Services - Housing	Housing Need Assessment Market Analysis	Phone interview; Oakland County will continue to invite the organization to participate in consultation opportunities.

Welcome Oakland	Other Government – County	Non-Homeless Special Needs	Phone interview; Oakland County will continue to invite the organization to participate in consultation opportunities.

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

Extensive efforts were made to consult a wide variety of community stakeholders, service providers, and organizations throughout Oakland County. Engagement methods are detailed above. No agency types were excluded from outreach efforts.

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

TABLE 3 – OTHER LOCAL / REGIONAL / FEDERAL PLANNING EFFORTS

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Oakland County Analysis of Impediments to Fair Housing Choice (2020)	Oakland County	Expanding affordable housing access
Oakland County Hazard Mitigation Plan (2023)	Oakland County	Hazard mitigation
Oakland County Citizen Participation Plan	Oakland County	Expanding citizen participation, community engagement, and outreach efforts
Alliance for Housing Annual Report (2025)	Alliance for Housing (CoC)	Homeless needs assessment and service provision

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))

Oakland County serves as the lead agency for both the CDBG participating communities and the HOME consortium. Member communities were invited to participate in the community feedback process and are eligible to apply for project funding via CDBG and HOME grant funding. Implementation of the Consolidated Plan

will primarily happen through projects from these participating communities, as well as countywide projects from Oakland County as a whole.

PR-15 CITIZEN PARTICIPATION – 91.105, 91.115, 91.200(C) AND 91.300(C)

Summary of citizen participation process/Efforts made to broaden citizen participation

An important component of the research process for the Consolidated Plan involved gathering input regarding fair and affordable housing conditions and needs in Oakland County. The County used a variety of public engagement approaches with residents and other stakeholders, including public meetings, focus groups, stakeholder interviews and a community survey. Input from these efforts is incorporated throughout the Consolidated Plan and was used to inform its priorities and goals.

Public Meetings

Oakland County collaborated with Mosaic Community Planning to host a total of three (3) open community meetings on the evenings of December 9, 10, and 11, 2025. Meetings included a presentation of the Consolidated Plan goals and an overview of the planning process and discussion of housing and community needs. A total of 9 community members attended a meeting.

Pop-up events

Mosaic Community Planning also held four (4) informal pop-up events in Oakland County during the week of December 8-12. These events included engaging passersby on the Consolidated Planning process, brief discussion prompts, and an invitation to complete the survey. A total of 43 community members were engaged at pop-up events.

Focus Groups

Three (3) focus groups were held in December 2025 and January 2026 – one with staff from the Community Housing Network, one with staff from the Oakland County Harm Reduction Office, and one with the Oakland County Citizen Advisory Committee. All groups indicated major homelessness and service needs within the County, which was previously identified by stakeholders as a major area of concern.

Community Insight Interviews

One-on-one community insight interviews were conducted by phone during November and December 2025. Stakeholders and service providers with important perspectives were selected by the County and invited to participate in 30-minute phone interviews

about housing and community needs within Oakland County. A total of 15 stakeholders provided input via phone interview.

Technical Consultations

In addition to broad stakeholder interviews, one-on-one technical consultations were also conducted via phone in order to fulfill specific HUD consultation requirements. A total of six (6) technical consultations were completed in the areas of: Public Land and Water, Climate Resiliency, Continuum of Care/PHA, Housing Developers, School District, and Workforce Development. Additionally, the Michigan High Speed Internet Office provided information via email in the areas of Broadband Providers and Organizations Providing Internet/Technology Access. Finally, the Oakland County Office of Emergency Management was invited to participate in a technical consultation but did not respond; however, the department's current Hazard Mitigation Plan was consulted for information in this area.

Community Survey

Oakland County conducted an extensive public housing and community needs survey in summer 2025. Respondents were asked for their feedback on various housing, public facility, and public service, and homelessness needs. Over 1,500 community members provided feedback via this survey.

Citizen Participation Outreach

TABLE 4 – CITIZEN PARTICIPATION OUTREACH

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons
1	Public Meetings	Non-targeted/ broad community	9 participants	• Specific housing needs vary significantly throughout the County, but affordability is a major concern throughout • Many residents are unclear on how to access resources and services, especially in rural areas • Transit needs exist throughout the County but are exacerbated in rural areas	None
2	Pop-up Events	Non-targeted/ broad community	43 participants	• Residents are concerned with new initiatives staying true to the existing character of a neighborhood • Housing prices are significantly outpacing wages	None
3	Focus Groups	Other – Service Providers	33 participants	• There is a significant lack of emergency and warming shelters – service providers have experienced clients freezing to death. • Lack of internet and device access is a major barrier for homeless residents trying to access services. • The only available street outreach services target very specific	None

				populations, leaving many people out. • Transportation is a significant issue for residents experiencing homelessness. • The ending of homelessness prevention programs and fundings that were created during COVID is a major issue. • There is a substantial need for all types of anti-displacement initiatives – eviction prevention, aging in place, accessibility modifications, etc.	
4	Community Insight Interviews	Non-English speaking: Spanish Minorities Other – Service Providers	15 participants	• Affordable housing is the County's largest single issue • There is a significant lack of basic resources available in Spanish, creating barriers to home ownership especially • Most resources are located in the southern portion of the County near Pontiac, exacerbating transit issues especially for homeless residents • Some areas of the County are food deserts, which especially impacts people without cars • Significant need for senior home rehab and aging in place initiatives	None
5	Technical Consultations	Other – Technical Experts	7 participants	• The Land Bank is doing important work that needs to be expanded • Climate resiliency is a growing concern in the County; the County is	None

				in the process of developing a climate vulnerability assessment template • A lack of transportation is a major barrier to resource access • There were many more homelessness prevention initiatives in the 2010s, but the funding has dried up • The end of ARPA funding is causing significant issues in homeless services • Housing vouchers are not keeping up with housing costs • Critical emergency repair needs are common for low-income residents who may not know how to get help • There has been a reduction in state/federal workforce funding that is harmful • Oakland County presents very unique needs and concerns due to its very large size, large number of communities, and large amount of rural land	
6	Community Survey	Non-targeted/ broad community	1,576 responses	• There is a large need for additional parks, recreation, and childcare facilities, as well as senior centers and day centers for disabled adults • There is a large need for street, sidewalk, and drain improvement • A lack of affordable housing is a major issue	None

				• Aging in place, homeless services and prevention, and resources for low-income disabled residents are the top three concerns • The top three housing focuses should be homeless services and resources, emergency and essential rehab/repair, and affordable home ownership opportunities • Over one-quarter of respondents did not know about the services and resources offered by the County	
7	Public Comment Period	Non-targeted/ broad community	A public hearing was held on March 17, 2026 (27 individuals present) with a 30 day comment period through April 17, 2026 A second hearing was held on April 21, 2026 (19 individuals present)	• It was noted that federal HOME funding is expected to remain stable for the upcoming program cycle, despite earlier concerns about potential reductions. • A clarification was made regarding fiduciary responsibilities: although one community administers its own CDBG funds, the County serves as the pass through entity for its HOME allocation. • Questions were raised about infrastructure reporting metrics, specifically why the number of residents served appears high relative to project budgets. • It was explained that infrastructure impact is calculated based on the total population within the census block where the improvement	None

				occurs, rather than the number of individuals directly receiving a service. • A question was raised about whether there is flexibility in the 20% administrative cap. It was clarified that the 20% administrative allowance is fixed and cannot be adjusted. • Additional clarification was requested regarding how program income is returned to the County. It was noted that program income is generated primarily through the Home Improvement Program when assisted homes are sold and the loan amount is repaid.	

OAKLAND COUNTY MICHIGAN
NEIGHBORHOOD & HOUSING DEVELOPMENT

2026-2030

Needs Assessment

NA-05 OVERVIEW

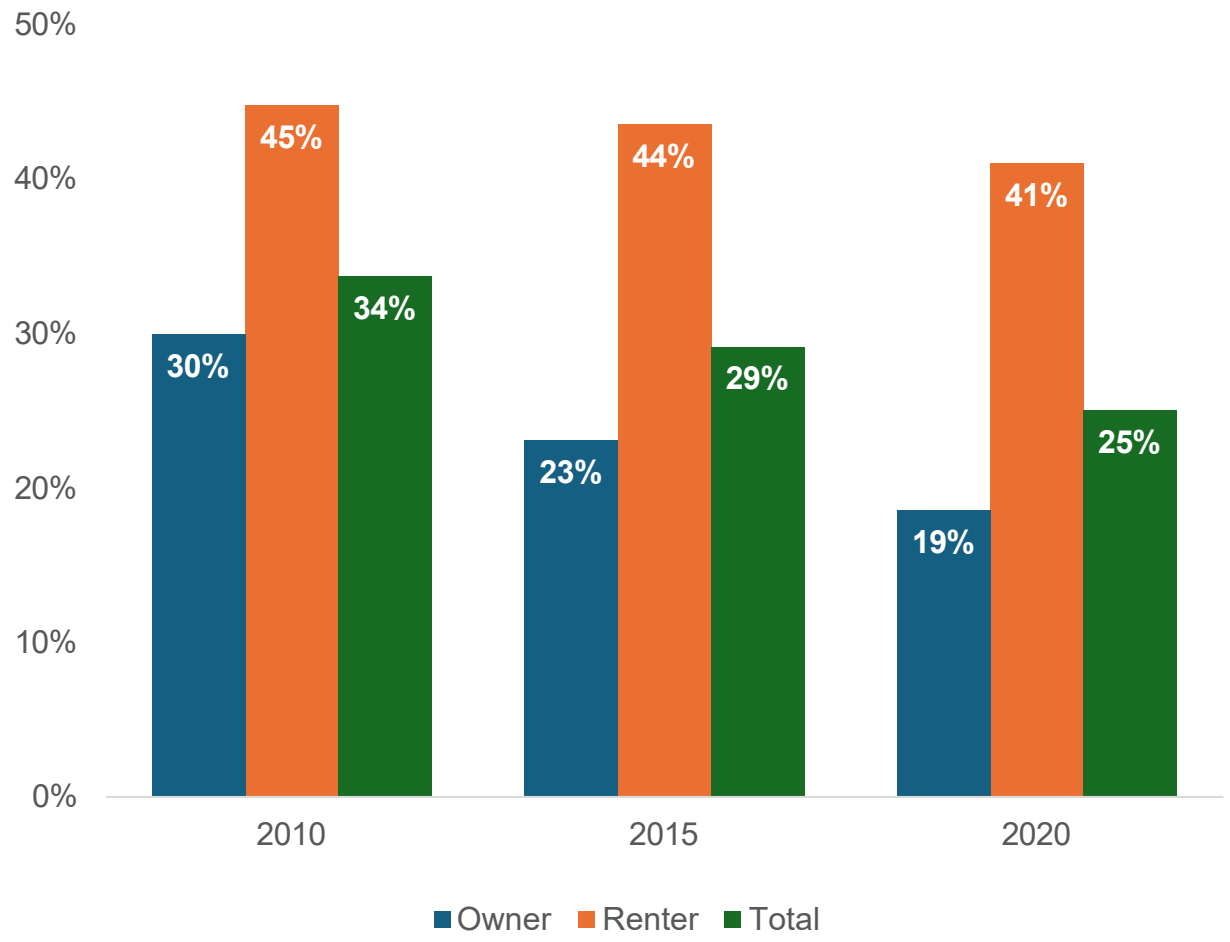
Needs Assessment Overview

To inform development of priorities and goals over the next five years, this section of the Consolidated Plan discusses housing, community development, and economic development needs in Oakland County. It relies on data from the U.S. Census, the 2016-2020 5-Year American Community Survey (ACS), and a special tabulation of ACS data known as Comprehensive Housing Affordability Strategy (CHAS) data that estimates the number of households with one or more housing needs. Local data regarding homelessness and assisted housing is included. Finally, public input gathered through stakeholder interviews, focus groups, meetings, and the community survey are coupled with data analysis to identify priority needs related to affordable housing, homelessness, assisted housing, community development, and economic development in Oakland County.

Key Findings

- Cost burden is the most common housing problem among all Oakland County households
- Renter households are disproportionately impacted by housing problems
- Extremely low income Black households exhibit disproportionately high rates of severe housing problems

FIGURE 1. RATES OF HOUSING PROBLEMS BY TENURE, OAKLAND COUNTY, 2010 TO 2020



NA-10 HOUSING NEEDS ASSESSMENT - 24 CFR 91.205 (A,B,C)

Summary of Housing Needs

According to the 2016-2020 5-Year American Community Survey, the population in the Oakland County entitlement jurisdiction is comprised of 907,575 residents and 358,825 households. Oakland County's population increased by 4% between 2009 and 2020. The number of households also increased by 6% during this period, from 339,290 to 358,825. Median household income in Oakland County increased by 21% between 2009 and 2020 from an estimated $67,465 to $81,587.

Table 6 segments households by income and household type, including small families (2-4 members), large families (5 or more members), households with seniors, and households with young children. As shown, 103,243 households in Oakland County have low or moderate incomes (under 80% of HUD Adjusted Median Family Income (HAMFI)) and together constitute more than a quarter (29%) of all households in the county. Households with seniors aged 62-74 comprise the largest portion (27%) of households with low or moderate incomes followed by small family households (25%) and households with seniors 75 or older (21%). Large family households have the smallest proportion of low- or moderate-income households (4%), followed by those with young children age 6 or under (9%).

For many low- and moderate-income households in Oakland County, finding and maintaining suitable housing at an affordable cost is a challenge. Table 7 through Table 12 identify housing needs by tenure based on Comprehensive Housing Affordability Strategy (CHAS) data. CHAS data is a special tabulation of the U.S. Census Bureau's American Community Survey (ACS) that is largely not available through standard Census products. This special dataset provides counts of the number of households that fit certain combinations of HUD-specified housing needs, HUD-defined income limits (primarily 30, 50, and 80% of HAMFI), and household types of particular interest to planners and policy makers.

To assess affordability and other types of housing needs, HUD defines four housing problems:

- Cost burden: A household has a cost burden if its monthly housing costs (including mortgage payments, property taxes, insurance, and utilities for owners and rent and utilities for renters) exceed 30% of monthly income.
- Overcrowding: A household is overcrowded if there is more than 1 person per room, not including kitchens and bathrooms.

- Lack of complete kitchen facilities: A household lacks complete kitchen facilities if it lacks one or more of the following: cooking facilities, refrigerator, or a sink with piped water.
- Lack of complete plumbing facilities: A household lacks complete plumbing facilities if it lacks one or more of the following: hot and cold piped water, a flush toilet, or a bathtub or shower.

HUD also defines four severe housing problems, including a **severe cost burden** (more than 50% of monthly household income is spent on housing costs), **severe overcrowding** (more than 1.5 people per room, not including kitchens or bathrooms), **lack of complete kitchen facilities** (as described above), and **lack of complete plumbing facilities** (as described above).

Table 7 indicates a total of 71,023 households, approximately 20% of all households in Oakland County, experience one of the listed housing problems. Data for households experiencing severe housing problems provided in Table 8 shows that approximately 10% of all households (34,934 households) experience one or more severe housing problems listed.

Overall, the most common housing problem in Oakland County is cost burden, regardless of tenure type. Nearly two-thirds (64%) of all households with incomes under 80% HAMFI (HUD adjusted median family income) in the county experience cost burdens. Severe cost burdens affect 17,353 owners and 14,664 renters in total, comprising almost half (49%) of all cost burdened households in Oakland County. For the lowest income households (those with incomes under 30% HAMFI), severe cost burdens are most common, impacting 87% of all households at that income level.

While the primary housing issue facing low- and moderate-income residents is related to affordability, there are other housing needs in the county. Less than 2% of all households experience overcrowding (or are doubled up); reside in substandard housing or lack complete plumbing and kitchen facilities; or have zero or negative (no) income.

The remainder of this section characterizes local housing needs in more detail. The Market Analysis component of the Consolidated Plan identifies resources available to respond to these needs (public housing, tax credit and other subsidized properties, housing and services for the homeless, and others).

TABLE 5 - HOUSING NEEDS ASSESSMENT DEMOGRAPHICS

Demographics	Base Year: 2009	Most Recent Year: 2020	% Change
Population	869,135	907,575	4%
Households	339,290	358,825	6%
Median Income	$67,465.00	$81,587.00	21%

DATA SOURCE: 2000 CENSUS (BASE YEAR), 2016-2020 ACS (MOST RECENT YEAR)

Number of Households Table

TABLE 6 - TOTAL HOUSEHOLDS TABLE

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	26,839	28,709	47,695	29,935	225,675
Small Family Households	5,640	7,103	13,450	10,136	119,960
Large Family Households	929	1,101	2,393	1,892	18,290
Household contains at least one person 62-74 years of age	7,231	7,707	13,453	8,076	48,547
Household contains at least one person age 75 or older	5,247	6,829	9,565	3,951	17,161
Households with one or more children 6 years old or younger	1,933	2,466	5,350	3,541	21,485

DATA SOURCE: 2016-2020 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

TABLE 7 – HOUSING PROBLEMS TABLE

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100 % AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100 % AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	273	330	270	85	958	107	14	74	32	227
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	105	50	100	49	304	0	4	49	10	63
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	139	256	242	128	765	42	155	236	164	597
Housing cost burden greater than 50% of income (and none of the above problems)	8,978	4,162	1,330	194	14,664	8,291	4,833	3,251	978	17,353

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100 % AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100 % AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	1,607	5,024	5,798	1,245	13,674	1,841	5,606	8,093	4,338	19,878
Zero/negative Income (and none of the above problems)	1,056	0	0	0	1,056	1,484	0	0	0	1,484

DATA SOURCE: 2016-2020 CHAS

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

TABLE 8 – HOUSING PROBLEMS 2

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100 % AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problem s	9,502	4,797	1,930	452	16,681	8,437	5,013	3,627	1,176	18,253

Having none of four housing problems	4,726	6,713	13,587	8,163	33,189	4,158	12,173	28,540	20,120	64,991
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0

DATA SOURCE: 2016-2020 CHAS

3. Cost Burden > 30%

TABLE 9 – COST BURDEN > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	2,516	2,495	2,123	7,134	2,323	2,659	3,333	8,315
Large Related	368	263	153	784	438	447	606	1,491
Elderly	3,958	3,176	2,213	9,347	5,286	5,500	5,652	16,438
Other	4,151	3,715	2,747	10,613	2,167	1,919	1,854	5,940
Total need by income	10,993	9,649	7,236	27,878	10,214	10,525	11,445	32,184

DATA SOURCE: 2016-2020 CHAS

4. Cost Burden > 50%

TABLE 10 – COST BURDEN > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	0	0	987	987	2,096	1,464	0	3,560
Large Related	0	0	54	54	379	277	213	869
Elderly	2,986	2,021	708	5,715	4,092	2,334	1,670	8,096
Other	0	3,743	1,387	5,130	1,841	0	0	1,841
Total need by income	2,986	5,764	3,136	11,886	8,408	4,075	1,883	14,366

DATA SOURCE: 2016-2020 CHAS

5. Crowding (More than one person per room)

TABLE 11 – CROWDING INFORMATION – 1/2

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	219	292	300	109	920	18	110	217	128	473
Multiple, unrelated family households	25	0	35	37	97	24	45	77	49	195

Other, non-family households	10	14	8	30	62	0	4	0	0	4
Total need by income	254	306	343	176	1,079	42	159	294	177	672

DATA SOURCE: **2016-2020 CHAS**

TABLE 12 – CROWDING INFORMATION – 2/2

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present								

Describe the number and type of single person households in need of housing assistance.

Estimates of the number of non-elderly single person households in need of housing assistance are included in the “other, non-family” category of Table 9 and in Table 10. This category includes multi-person households whose members are unrelated (e.g., roommates, un-married partners, etc.). There are an estimated 16,553 single-person or multi-person unrelated households with low or moderate incomes who spend more than 30% of their income on housing. Single-person or multi-person unrelated households comprise 28% of all households experiencing cost burdens. Renters comprise a majority (64%) of this subgroup while the remaining 36% are owners.

For renter households, over one-third (38%) of single person households experiencing cost burdens have very low incomes (0-30% HAMFI), 35% have low incomes (>30-50% HAMFI), and 26% have moderate incomes (>50-80% AMI). The breakdown is similar for owner households with cost burdens. However, moderate-income owner households with cost burdens (31%) comprise a slightly larger share compared to moderate-income renter households with cost burdens (26%).

Approximately forty-two percent (6,971 households) of single-person, non-family households with cost burdens have housing costs that exceed 50% of their income. Single person, non-family renters and owners with severe housing cost burdens

comprise 43% and 13% of all households with severe housing cost burdens, respectively. Approximately 26% of single person households experiencing severe cost burdens are households with incomes under 30% HAMFI. The proportion increases to 80% when including the number of single person households with incomes under 50% HAMFI.

Table 11 provides data for single-person, non-family households that indicate a total of 66 households experience overcrowding, comprising 4% of all households that experience problems with overcrowding.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

Data gathered from the 2016-2020 ACS estimates 145,790 disabled persons residing in Oakland County, approximately 12% of the county's total population. Using 2016-2020 CHAS data, there are approximately 83,130 households with at least one of the four housing problems that have a member with a disability.

The Michigan State Police publishes statistics on services provided to domestic violence victims by county through the Michigan Incident Crime Reporting (MICR) crime dashboard. During 2024, approximately 5,144 victims were served across Oakland County. 79% of the victims were provided with emergency shelter and 37% of victims were provided with transitional or other housing programs. The survey also identified 62% of unmet requests were related to housing. There is no data to indicate the availability of shelter services for victims of domestic violence specifically in Oakland County, however, HAVEN Oakland assists domestic violence victims in finding housing or shelter.

What are the most common housing problems?

CHAS data indicates the most common housing problems in Oakland County regardless of tenure type are unaffordable housing costs. Nearly one-fifth of all households in Oakland County experience housing cost burdens, of which 92% are low- to moderate-income households. The proportion of low- to moderate-income households increases to 96% among households experiencing severe housing cost burdens. Examining extremely low-income households in particular shows that 64% of all households with incomes under 30% HAMFI experience severe cost burdens.

In addition to CHAS data on housing cost burdens, housing affordability problems in Oakland County are implied by homelessness data published by the regions Continuum of Care (CoC), the Alliance for Housing. According to their Community Dashboard, the Alliance for Housing served 2,553 people during 2025, 932 of which were people experiencing homelessness.

Are any populations/household types more affected than others by these problems?

According to Table 8, renter households are disproportionately affected by severe housing problems than owner households. Approximately one-third (33%) of all renter households in Oakland County experience one or more severe housing problems compared to 22% of owner households. Table 8 also indicates renters with income less than 30% HAMFI comprise more than half (52%) of all households experiencing one or more severe housing problems. The proportion balloons to 78% when including the number of renter households with incomes under 50% HAMFI. Table 7 shows both renter and owner households with incomes less than 30% HAMFI comprise the largest percentage (34%) of households that experience one of the listed housing problems.

The number of renter households (1,069) that experience overcrowding is larger than the number of owner households (660) with the same problem. Ninety percent (90%) of all cost burdened households are comprised of households with very low to moderate income.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

According to the 2016-2020 5-Year ACS data, 7.8% of residents in Oakland County are living at or below the poverty level. Proportionately, Black (14%), unemployed (24%), children under the age of 18 (9%), and people who have not graduated high school (20%) are more likely to live at or below poverty level. Twenty-three percent (23%) of all families that have a female householder with children and no spouse are below poverty level, significantly higher than the proportion of married couple families with children below poverty (3%).

Low wages, rising rental costs, and the scarcity of affordable housing for low- and extremely low-income households place vulnerable households at even greater risk for eviction or homelessness. Individuals and families at imminent risk and those who have experienced homelessness and are receiving rapid re-housing assistance often face a myriad of barriers including prior histories of homelessness or eviction, chronic physical or mental disabilities, poor credit, criminal histories, and limited access to additional education or job skills training. The greatest need of formerly homeless families and

individuals receiving rapid re-housing assistance is the availability of standard housing that is affordable to households at or below 50% AMI.

For formerly homeless families and individuals nearing the termination of assistance, the top needs are for increased, sustainable income (earned and unearned); access to Social Security disability and other mainstream benefits; linkages to health, mental health, and legal services; access to affordable transportation and childcare; access to transitional and supportive housing programs; and ongoing case management and supportive services.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

The Community Housing Network (CHN) provides homelessness prevention services to households at imminent risk of homelessness through short-term financial assistance and housing case management services. According to their 2024 Annual Report, they served 106 individuals through this program between 2023 and 2024. The CHN uses HUD's Category 2 – Imminent Risk of Homelessness definition to determine eligibility for this program, which defines households that will imminently lose their primary nighttime residence, provided that "residence will be lost within 14 days of the date of application for assistance; no subsequent residence has been identified; and the households lacks resources or support networks needed to obtain other permanent housing". Applicants must also be a resident of Oakland County and have an annual gross income below 30% Area Median Income (AMI).

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

The most fundamental risk factor for homelessness is extreme poverty, leading to unaffordable rents or homeowner costs. Renters with incomes under 30% HAMFI and housing cost burdens over 50% are at risk of homelessness, especially if they experience a destabilizing event such as a job loss, reduction in work hours, or medical emergency/condition. Such factors may also put low-income homeowners at risk of foreclosure and subsequent homelessness.

NA-15 DISPROPORTIONATELY GREATER NEED: HOUSING PROBLEMS – 91.205 (B)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

This section assesses the housing needs of racial and ethnic groups at various income levels in comparison to needs at that income level as a whole to identify any disproportionately greater needs. According to HUD, a disproportionately greater need exists when members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. Table 13 through Table 16 identify the number of households experiencing one or more of the four housing problems by householder race, ethnicity, and income level. The four housing problems include: (1) cost burdens (paying more than 30% of income for housing costs); (2) overcrowding (more than 1 person per room); (3) lacking complete kitchen facilities; and (4) lacking complete plumbing facilities.

Income classifications include:

- Extremely low income – up to 30% of area median income (AMI) or $32,150 for a family of four;
- Very low income – 30 to 50% AMI or $32,151 to $50,500 for a family of four;
- Low income – 50 to 80% AMI or $50,501 to $80,800 for a family of four; and
- Moderate income – 80 to 100% AMI or $80,801 to $101,000 for a family of four.

0%-30% of Area Median Income

TABLE 13 - DISPROPORTIONALLY GREATER NEED 0 - 30% AMI

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	20,854	2,667	2,187
White	16,932	2,337	1,658
Black / African American	2,334	119	188
Asian	824	120	209
American Indian, Alaska Native	65	18	0
Pacific Islander	15	0	0
Hispanic	493	70	70

DATA SOURCE: 2016-2020 CHAS

*The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30%-50% of Area Median Income

TABLE 14 - DISPROPORTIONALLY GREATER NEED 30 - 50% AMI

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	19,492	6,666	0
White	16,431	5,886	0
Black / African American	1,408	273	0
Asian	660	95	0
American Indian, Alaska Native	39	59	0
Pacific Islander	65	0	0
Hispanic	739	258	0

DATA SOURCE: 2016-2020 CHAS

*The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

TABLE 15 - DISPROPORTIONALLY GREATER NEED 50 - 80% AMI

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	22,245	22,130	0
White	19,199	19,495	0
Black / African American	1,875	1,355	0
Asian	580	553	0
American Indian, Alaska Native	25	134	0
Pacific Islander	0	0	0
Hispanic	448	310	0

DATA SOURCE: 2016-2020 CHAS

*The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

TABLE 16 - DISPROPORTIONALLY GREATER NEED 80 - 100% AMI

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	10,709	18,306	0
White	9,069	16,198	0
Black / African American	831	1,036	0
Asian	519	572	0
American Indian, Alaska Native	10	0	0
Pacific Islander	0	0	0
Hispanic	167	282	0

DATA SOURCE: 2016-2020 CHAS

*The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

Housing needs are most likely to impact the lowest income households. For households with incomes under 30% AMI, more than four-fifths (81%) of households have a housing problem. Three-fourths (75%) of very low-income households (30 to 50% AMI) have a housing problem, as do half (50%) of low-income households (50 to 80% AMI). Among moderate income households (80 to 100% AMI), about 37% of households have a housing problem. Disproportionate needs impact several racial and ethnic groups, as described below.

Extremely Low Incomes (< 30% AMI)

Overall, 81% of extremely low-income households have a housing problem. Though overall numbers are low, Pacific Islander households have disproportionate need: 100%

of the fifteen (15) Pacific Islander households in this income band have a housing problem.

Very Low Incomes (30-50% AMI)

Overall, 75% of very low-income households have a housing problem. Again, Pacific Islander households have disproportionate need: 100% of the 65 Pacific Islander households in this income band have a housing problem. Very low-income Asian households also exhibit disproportionate need, with 87% having a housing problem. Additionally, very low-income Black and African American households also exhibit high rates of housing problems (84%), just one percentage point difference away from meeting HUD's definition of disproportionate need.

Low Incomes (50-80% AMI)

Overall, 50% of low-income households have a housing problem. There are no groups with disproportionate need. However, 59% of low-income Hispanic households have a housing problem along with 58% of low-income Black households. These groups are only a 1 and 2 percentage point difference away from meeting HUD's definition of disproportionate need, respectively.

Moderate Incomes (80-100% AMI)

Overall, 37% of moderate-income households have a housing problem. In this income bracket, Asian households exhibit disproportionate need, with 48% having a housing problem. Additionally, 100% of the ten (10) moderate-income American Indian/Alaska Native households have a housing problem, exhibiting disproportionate need. Again, the rate of housing problems among moderate-income Black households is higher (45%), but not considered disproportionate in comparison to the overall income category.

NA-20 DISPROPORTIONATELY GREATER NEED: SEVERE HOUSING PROBLEMS – 91.205 (B)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

This section assesses the severe housing needs of racial and ethnic groups at various income levels in comparison to severe needs at that income level as a whole to identify any disproportionately greater needs. Like the preceding analysis, this section uses HUD's definition of disproportionately greater need, which occurs when one racial or ethnic group at a given income level experiences housing problems at a rate that is at least 10 percentage points greater than the income level as a whole.

Table 17 through Table 20 identify the number of households with one or more of the severe housing needs by householder race and ethnicity. The four severe housing problems include: (1) severe cost burden (paying more than 50% of income for housing and utilities); (2) severe crowding (more than 1.5 people per room); (3) lack of complete kitchen facilities; and (4) lack of complete plumbing facilities.

Income classifications include:

- Extremely low income – up to 30% of area median income (AMI) or $32,150 for a family of four;
- Very low income – 30 to 50% AMI or $32,151 to $50,500 for a family of four;
- Low income – 50 to 80% AMI or $50,501 to $80,800 for a family of four; and
- Moderate income – 80 to 100% AMI or $80,801 to $101,000 for a family of four.

0%-30% of Area Median Income

TABLE 17 – SEVERE HOUSING PROBLEMS 0 - 30% AMI

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	17,664	5,862	2,187
White	14,097	5,158	1,658
Black / African American	2,109	334	188
Asian	774	170	209
American Indian, Alaska Native	61	22	0
Pacific Islander	0	15	0
Hispanic	438	125	70

DATA SOURCE: 2016-2020 CHAS

*The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

TABLE 18 – SEVERE HOUSING PROBLEMS 30 - 50% AMI

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	10,715	15,500	0
White	9,235	13,135	0
Black / African American	602	1,079	0
Asian	379	395	0
American Indian, Alaska Native	8	89	0
Pacific Islander	65	0	0
Hispanic	335	648	0

DATA SOURCE: 2016-2020 CHAS

*The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

TABLE 19 – SEVERE HOUSING PROBLEMS 50 - 80% AMI

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	8,568	35,792	0
White	7,388	31,332	0
Black / African American	644	2,590	0
Asian	270	868	0
American Indian, Alaska Native	15	144	0
Pacific Islander	0	0	0
Hispanic	218	545	0

DATA SOURCE: 2016-2020 CHAS

*The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

TABLE 20 – SEVERE HOUSING PROBLEMS 80 - 100% AMI

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,101	25,876	0
White	2,632	22,625	0
Black / African American	157	1,720	0
Asian	219	878	0
American Indian, Alaska Native	0	10	0
Pacific Islander	0	0	0
Hispanic	80	370	0

DATA SOURCE: 2016-2020 CHAS

*The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

Severe housing needs are most likely to impact the lowest income households. For households with incomes under 30% AMI, about 69% of households have a severe housing problem. Forty-one percent (41%) of very low-income households (30 to 50% AMI) have a severe housing problem, as do 19% of low-income households (50 to 80% AMI). For the moderate income band (80 to 100% AMI), only 11% of households have a severe housing problem. Disproportionate needs impact several racial/ethnic groups at different income levels, as described below.

Extremely Low Incomes (< 30% AMI)

Overall, 69% of extremely low-income households have a severe housing problem. Black and African American households are the only racial/ethnic group to exhibit

disproportionate need at this income level, with 80% experiencing a severe housing problem.

Very Low Incomes (30-50% AMI)

Overall, 41% of very low-income households have a severe housing problem. Pacific Islander households have disproportionate need: 100% of the 65 Pacific Islander households in this income band have a severe housing problem. Additionally, very low-income Black and African American households also exhibit high rates of severe housing problems (49%), just a two percentage point difference away from meeting HUD's definition of disproportionate need.

Low Incomes (50-80% AMI)

Overall, 19% of low-income households have a severe housing problem. There are no groups with disproportionate need. However, 29% of low-income Hispanic households have a severe housing problem, a 1 percentage point difference away from meeting HUD's definition of disproportionate need.

Moderate Incomes (80-100% AMI)

Overall, 11% of moderate-income households have a severe housing problem. There are no groups with disproportionate need. However, 20% of moderate-income Asian households have a severe housing problem, a 1 percentage point difference away from meeting HUD's definition of disproportionate need.

NA-25 DISPROPORTIONATELY GREATER NEED: HOUSING COST BURDENS – 91.205 (B)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

This section assesses the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole. While the preceding sections assessed all housing and severe housing problems, Table 21 focuses only on what share of their income households spend on housing. Data is broken down into groups spending less than 30% of income on housing costs, those paying between 30 and 50% (i.e., with a cost burden), and those paying over 50% (i.e., with a severe cost burden). The final column, “no/negative income,” identifies households without an income, for whom housing as a share of income was not calculated.

Housing Cost Burden

TABLE 21 – GREATER NEED: HOUSING COST BURDENS AMI

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	228,637	58,702	41,444	2,271
White	198,848	49,652	34,984	1,703
Black / African American	10,936	4,352	3,572	188
Asian	12,733	2,838	1,551	249
American Indian, Alaska Native	453	76	65	4
Pacific Islander	10	30	65	0
Hispanic	3,678	1,159	947	70

DATA SOURCE: 2016-2020 CHAS

Discussion:

Table 21 shows that approximately 30% of all households in Oakland County are considered cost burdened or severely cost burdened. American Indian/Alaska Native households are the least likely to spend more than 30% of income on housing costs (24% of white households are cost burdened or severely cost burdened), compared to 42% of Black/African American households and 90% of Pacific Islander households. Both groups have a disproportionate need relative to the jurisdiction as a whole.

Looking at severe cost burdens (i.e., households spending more than 50% of income on housing), 13% of all households in Oakland County are impacted. Pacific Islander households are the only racial/ethnic group to exhibit disproportionate rates of severe cost burden (62%).

NA-30 DISPROPORTIONATELY GREATER NEED: DISCUSSION – 91.205(B)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

There are several income categories in which a racial or ethnic group has a disproportionately greater need than the needs of the income category as a whole, summarized below.

Extremely Low Incomes (Under 30% AMI)

- At extremely low incomes, 81% of all households in the county have a housing problem and 69% have a severe housing problem.
- Pacific Islander households have disproportionate need: 100% of the fifteen (15) Pacific Islander households in this income band have a housing problem.
- Black and African American households have disproportionate rates of severe housing needs at this income level, with 80% experiencing a severe housing problem.

Very Low incomes (30 to 50% AMI)

- At low incomes, 75% of all households have a housing problem and 41% have a severe housing problem.
- Pacific Islander households have disproportionate need: 100% of the 65 Pacific Islander households in this income band have a severe housing problem.

Low Incomes (50 to 80% AMI)

- At low incomes, half (50%) of all households have a housing problem and 19% have a severe housing problem.
- There are no racial or ethnic groups that exhibit disproportionate need in this income category.

Moderate Incomes (80 to 100%)

At moderate incomes, 37% of all households have a housing problem and 11% have a severe housing problem. Asian households exhibit disproportionate need, with 48% having a housing problem.

If they have needs not identified above, what are those needs?

Input collected during the community engagement process identified housing affordability for low- and moderate-income households as the priority housing need in Oakland County. Community members also discussed a need for senior housing, housing rehabilitation/repair programs, and homelessness prevention services in the county.

In addition to housing needs, stakeholders identified the following needs experienced by low- and moderate-income households in Oakland County: high speed internet and computers, affordable childcare, access to transportation options, and mental health services.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

The map in MA-50 shows the population distribution for residents in Oakland County by race and ethnicity. Most of the Black and Asian populations are concentrated in similar clusters the north, east, and west segments of the county.

NA-35 PUBLIC HOUSING – 91.205(B)

Introduction

Public housing within Oakland County is provided through nine different Housing Authorities under the jurisdictions of its various member communities. This data is aggregated by HUD and provided to entitlement communities for use in the Consolidated Planning Process. For Oakland County's 2026-2030 Consolidated Plan, HUD aggregated data from the following Housing Authorities:

- Pontiac Housing Commission
- South Lyon Housing Commission
- Royal Oak Township Housing Commission
- Plymouth Housing Commission
- Ferndale Housing Commission
- Southfield Housing Commission
- Royal Oak Housing Commission
- Madison Heights Housing Commission
- Michigan State Housing Development Authority

Note that there may not be a 1:1 overlap between relevant housing authorities and the Oakland County entitlement area – for example, the City of Pontiac manages its own grant funding, but data from its housing authority was included by HUD as voucher holders live within the greater Oakland County area.

The sum total of units and vouchers in use within Oakland County are depicted below this HUD comprehensive database.

Note: The tables within this section contain data provided by HUD that represents combined statistics for the Ferndale Housing Commission, Madison Heights Housing Commission, Michigan State Housing Development Authority, Plymouth Housing Commission, Pontiac Housing Commission, Royal Oak Housing Commission, Royal Oak Township Housing Commission, South Lyon Housing Commission, and Southfield Housing Commission. Oakland County is presenting the data as provided by HUD; however, the County acknowledges that it may include data on housing and/or residents outside the County's entitlement jurisdiction.

Totals in Use

TABLE 22 - PUBLIC HOUSING BY PROGRAM TYPE

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
							Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	344	803	26,987	898	25,389	318	52	252

DATA SOURCE: PIC (PIH INFORMATION CENTER)

*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Characteristics of Residents

TABLE 23 – CHARACTERISTICS OF PUBLIC HOUSING RESIDENTS BY PROGRAM TYPE

	Program Type							
				Vouchers				
							Special Purpose Voucher	
	Certificate	Mod-Rehab	Public Housing	Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program
# Homeless at admission	0	0	3	113	30	30	53	0
# of Elderly Program Participants (>62)	0	52	210	3,948	168	3,658	29	3
# of Disabled Families	0	209	244	9,191	317	8,571	85	16
# of Families requesting accessibility features	0	344	803	26,987	898	25,389	318	52
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

DATA SOURCE: PIC (PIH INFORMATION CENTER)

*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Race of Residents

TABLE 24 – RACE OF PUBLIC HOUSING RESIDENTS BY PROGRAM TYPE

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	182	224	12,450	444	11,699	91	9	156
Black/African American	0	159	574	14,109	420	13,301	226	42	95
Asian	0	0	2	110	4	106	0	0	0
American Indian/Alaska Native	0	3	0	282	25	252	1	1	1
Pacific Islander	0	0	3	36	5	31	0	0	0
Other	0	0	0	0	0	0	0	0	0

DATA SOURCE: PIC (PIH INFORMATION CENTER)

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Ethnicity of Residents

TABLE 25 – ETHNICITY OF PUBLIC HOUSING RESIDENTS BY PROGRAM TYPE

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	18	11	727	37	677	6	0	1
Not Hispanic	0	326	792	26,260	861	24,712	312	52	251

DATA SOURCE: PIC (PIH INFORMATION CENTER)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

Based on 2019 research conducted by the Joint Center for Housing Studies of Harvard University, the needs for accessible units most often include entrance requirements (ground floor entry or wider entryways) and bathroom accommodations. Composite data on average wait times for units or vouchers of all housing authorities throughout the Oakland County consortium is unavailable; however, APSH data indicates that within Oakland County proper, the average wait time is 19 months (1.6 years) for a Housing Choice Voucher and 88 months (7.3 years) for a Publicly Supported Housing unit.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

Consolidated Plan community engagement efforts highlighted that public housing residents and HCV holders are in immediate need of safe, affordable housing in good condition. For HCV holders, finding property owners that accept tenants on voucher assistance is a common challenge.

Residents receiving housing assistance often need additional supportive services that include mental health services, food, legal services, childcare, and healthcare. General opportunities to attain a level of financial stability and professional skills as well as resources in areas such as job training and employment assistance are also needed. Many of these are provided through supplemental programs throughout the County; however, community feedback indicated that residents are sometimes unaware of what resources exist or how to access them. Because of this, increased communication and collaboration efforts to form a centralized resource hub would be extremely beneficial to publicly supported housing residents as well as the low- to moderate-income population as a whole.

How do these needs compare to the housing needs of the population at large?

The needs of public housing residents and voucher holders are different from those of the County's overall low- and moderate-income population primarily in that these residents are stably housed in housing they can afford. With this need met, residents can work on other needs that low- to moderate-income families typically face in addition to housing insecurity.

Discussion

Comparing the characteristics of publicly supported housing residents in an area to the characteristics of that area's overall population can highlight disparities within disadvantaged groups. Table 25 shows that among Oakland County residents of

publicly supported housing, 53% are Black, 46% are white, 1% are Native American, 0.4% are Asian, and 0.1% are of other races (Hispanic or Latino residents of publicly supported housing were not reported). In contrast, the County's overall population is 69% white, 13% Black, 8% Asian, 0.1% Native American, and 4.8% other or multiple races[1]. This comparison shows that Black and Native American residents are significantly overrepresented in publicly supported housing in comparison to their overall population share, indicating that residents of these races are significantly more likely to need housing assistance than residents of other races. This, in turn, indicates that Black and Native American residents of Oakland County face more barriers in housing access and affordability than residents of other races.

Additionally, Table 23 shows that 34% of publicly supported households in Oakland County have at least one member with a disability. In contrast, only 11.4% of the County's overall population has a disability. This indicates that disabled residents are significantly more likely to need housing assistance than residents without disabilities, which in turn indicates that residents of Oakland County with disabilities face more barriers in housing access and affordability than residents without disabilities.

[1] 2019-2023 American Community Survey, Table DP05

NA-40 HOMELESS NEEDS ASSESSMENT – 91.205(C)

Introduction:

This section provides an assessment of Oakland County's homeless population and its needs. The Alliance for Housing of Oakland County, formerly the Oakland County Taskforce on Homelessness and Affordable Housing (OCTHAH), is the Continuum of Care (CoC) for Oakland County. In the HUD database, the Continuum of Care is known as MI-504: Pontiac, Royal Oak/Oakland County CoC. This section will discuss official Point-In-Time Count data reported to HUD through the MI-504 CoC, as well as additional, more detailed data reported independently through the Alliance for Housing.

As of the date of this publication, the most recently available official data is for the year 2024. Small amounts of unofficial supplemental data may be available in some areas, as noted below.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

The tables below depict homelessness as assessed by the 2024 Point-In-Time count for the MI-504 CoC, which assesses homelessness as persons experiencing homelessness on one given night in January. This data is considered official and is standard to include in the Consolidated Plan; however, service providers interviewed as part of the community engagement process consistently reported that in Oakland County the PIT count is unusually inaccurate in capturing the actual nature extent of homelessness. Because of this, PIT data is included below and followed with additional data provided by the Alliance for Housing, which serves as the CoC for the area.

According to the PIT count there were 357 people experiencing homelessness in the Continuum of Care in 2024, representing a decrease of 7.5% from the previous year and 16% over 5 years. (Unofficial 2026 PIT data from the CoC reflects similar numbers, with 331 sheltered and 36 unsheltered individuals). Of the homeless persons identified in Oakland County, 37, or 9.5%, were considered chronically homeless. HUD defines chronic homelessness in the following way:

- A homeless individual with a disability as defined in section 401(9) of the McKinney-Vento Assistance Act (42 U.S.C. 11360(9)), who:
    - Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter, and
    - Has been homeless and living as described for at least 12 months* or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described, or
- An individual who has been residing in an institutional care facility for less, including jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria of this definition before entering that facility**: or
- A family with an adult head of household (or, if there is no adult in the family, a minor head of household) who meets all of the criteria of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

The count also identified 117 accompanied and 7 unaccompanied children under 18 who were homeless; 22 transitional-aged youth (age 18-24), 17 homeless seniors (aged 65 or older), 35 homeless survivors of domestic violence; 15 homeless veterans; one homeless person with HIV/AIDS; 51 homeless people with a severe mental illness; and 9 people with chronic substance use disorder. (Note that some people may be counted in multiple categories – for example, a person may fall into both the severe mental illness and chronic substance abuse categories). Data on the average number of days people experienced homelessness was not available.

TABLE 26 – 2024 POINT IN TIME COUNT DATA

Sub-Group	Number of people experiencing homelessness on a given night		
	Sheltered	Unsheltered	Total
Households with adults & children	50	0	50
Households with adults only	141	29	170
Households with children only	7	0	7
Total Homeless Households	**198**	**29**	**227**
Chronically Homeless	24	10	34
Substance Use Disorder	4	5	9
Serious Mental Illness	33	18	51
Domestic Violence Survivor	25	10	35
HIV/AIDS	1	0	1
Accompanied minors	117	0	117
Unaccompanied minors	7	0	7
Veterans	14	1	15
Transitional Aged Youth (18-24)	21	1	22
Seniors (65+)	14	3	17
Total Homeless Persons	**327**	**30**	**357**

Nature and Extent of Homelessness

TABLE 27 – HOMELESSNESS BY RACE AND ETHNICITY

Race/ethnicity	# Sheltered	# Unsheltered	% Unsheltered	Total
Black	238	22	8.5%	260
White	118	18	13.2%	136
Hispanic/Latino	1	11	8.3%	12
Asian/Pacific Islander	3	0	0.0%	3
Native American	0	0	0	0
Other/multiple	23	3	11.5%	26

The table above depicts homelessness by race and ethnicity within Oakland County. Black residents make up two-thirds of the homeless population, despite making up only 13% of Oakland County's overall population, meaning that Black residents are drastically more likely to become homeless than residents of other races. However, Black residents who were homeless were less likely to be unsheltered than white residents and residents of other or multiple races, while white residents were most likely to be unsheltered. These discrepancies may indicate that Black residents face more socioeconomic barriers or adversities leading to homelessness than other racial or ethnic groups, while white residents may face more barriers in accessing resources than other groups once homeless.

Sheltered and Unsheltered Homelessness

The 2024 PIT count showed that 30 out of 357 people experiencing homelessness in January 2024, or 8.4%, were unsheltered. However, service providers consistently noted that this is inaccurate and that there is an urgent need in Oakland County for additional emergency shelter and warming options, with some providers reporting that they had personally experienced clients freezing to death due to a lack of shelter beds.

Notably, homeless survivors of domestic violence had an unusually high rate of unsheltered homelessness, with nearly one-third being unsheltered. This may indicate a need for additional resources and shelter options for people fleeing domestic violence in Oakland County.

Other groups who were disproportionately more likely to be unsheltered include people with serious mental illnesses, people with chronic substance use disorders, and people who are chronically homeless.

Veterans and Families with Children

Only 15 homeless veterans were found in the 2024 PIT count, and of these, only one was unsheltered. The 2024 PIT count also recorded 50 homeless households with accompanied children, making up 117 children experiencing homelessness, as well as 7 children who were homeless and did not have a parent or guardian present. No families with children, whether accompanied or unaccompanied, were found to be unsheltered. However, once again, it is relevant to note that service providers in the area consistently reported that the PIT count is inaccurate in its assessment of unsheltered homelessness, and that there is an urgent need for additional emergency shelter beds.

Discussion

In addition to official data reported to HUD by the MI-504 CoC, the Alliance for Housing publishes yearly homelessness reports containing more detailed information on some subsets of the population. While Point-In-Time data provides a snapshot of homelessness as it exists on one night, the Alliance for Housing reports comprehensive homelessness data for the entire year using the HMIS database.

The Alliance for Housing found that in 2024 in Oakland County, 1,289 different people in 878 different households experienced “literal” homelessness, which excludes situations such as doubling up, couch surfing, or moving in with friends and family due to financial hardship. In contrast to the HUD PIT count, which showed a 7.5% decrease in homelessness since the previous year, the AFH report constitutes a 7.9% increase in homelessness in 2024 vs 2023.

Notably, this increase was comprised entirely of children who were homeless – in 2023, 851 adults and 344 children were homeless, while in 2024, 845 adults and 443 children were homeless. This represents a concerning increase of nearly 30% of children experiencing homelessness. The chart below, provided by the Alliance for Homelessness, depicts the number of homeless persons in varying age groups in 2024 vs 2023, showing that the largest age group of homeless children is children aged 5 to 10, followed by children from newborn to age 4. The largest increases in homelessness among all age groups, child or adult, between 2023 and 2024 were seen among children aged 5-14.

Literally Homeless Age Breakdown January 1- December 31	2024	2023
Newborn to 4	125 or 9.70%	120 or 10.04%
5 to 10	151 or 11.71%	105 or 8.79%
11 to 14	100 or 7.76%	60 or 5.02%
15 to 17	67 or 5.20%	59 or 4.94%
18 to 24	100 or 7.76%	109 or 9.12%
25 to 34	199 or 15.44%	190 or 15.90%
35 to 44	190 or 14.74%	197 or 16.49%
45 to 54	156 or 12.10%	148 or 12.38%
55 to 64	138 or 10.71%	152 or 12.72%
65+	62 or 4.81%	55 or 4.60%
Unknown	1 or .08%	0

Source: Alliance for Housing Annual Report 2025, accessed via https://5ca7cb57-9e51-4bb0-9fe5-db52afb1eae4.filesusr.com/ugd/eb1e0d_0da59e1eaa8e4f42b3f2d614e1bb8f51.pdf

The AFH also assesses disability among homeless residents in Oakland County and published the following chart for varying disability rates in 2024 vs 2023:

Literally Homeless Disability Breakdown January 1- December 31	2024	2023
Physical Disability	137 or 10.63%	142 or 11.88%
Developmental Disability	162 or 12.57%	121 or 10.13%
Chronic Health Condition	91 or 7.06%	83 or 6.95%
Mental Health Disorder	239 or 18.54%	225 or 18.83%
Substance Use Disorder	62 or 4.81%	49 or 4.10%
At Least One Disability	410 or 31.81%	367 or 30.71%
No Disability	879 or 68.19%	828 or 69.29%

Source: Alliance for Housing Annual Report 2025, accessed via https://5ca7cb57-9e51-4bb0-9fe5-db52afb1eae4.filesusr.com/ugd/eb1e0d_0da59e1eaa8e4f42b3f2d614e1bb8f51.pdf

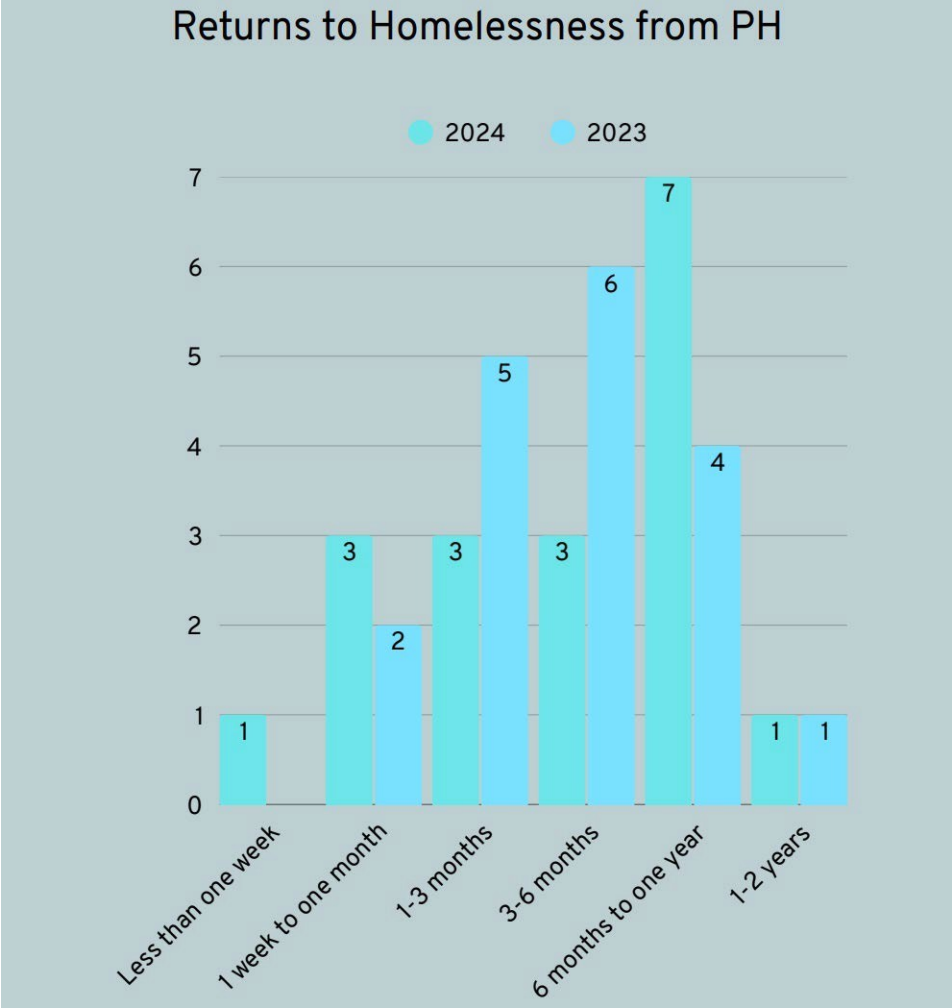
This data shows that in 2024, nearly 32% of Oakland County residents who experienced homelessness had one or more disabilities – nearly three times the overall Oakland County disability rate of 11.4%. The most common disabilities experienced by homeless residents were mental health disorders, developmental disabilities, and physical disabilities. This disproportionate presence of disability among Oakland County's homeless population indicates a substantial need for increased resources, services, and affordable, accessible housing for the County's disabled populations in order to prevent homelessness.

In 2024, 330 people, or 25.6% of those who experienced homelessness, reported to the AFH that they had experienced domestic violence. This is a substantially higher rate than found in the 2024 PIT count, which reported only 7% of the homeless population having experienced domestic violence. In combination with PIT count data which shows an unusually high rate of unsheltered homelessness among domestic violence survivors, the AFH data on very high rates of domestic violence survivors among the

homeless population indicates an extremely pressing need for increased services for survivors of domestic violence within Oakland County.

The AFH also collects and reports data on chronic homelessness, and found that in 2024, 230 of the 1,289 people who experienced homelessness in Oakland County were chronically homeless. Of these, nearly half had entered and exited homelessness four or more times in 2024, and 71% had been homeless for more than 12 months. In contrast, among the entire homeless population in 2024, only 15% had been homeless four or more times and only 4% had been homeless for longer than 12 months. This shows that chronically homeless residents of Oakland County are returning to homelessness at high rates after initially accessing housing, which indicates a significant need for expanded wraparound and supportive services to support these individuals once they are housed. This conclusion was echoed by homeless service providers consulted for the Consolidated Planning process, who reported that they see clients return to homelessness at high rates due to a lack of long-term supportive wraparound services. Service providers also noted that a key factor in chronically homeless clients returning to homelessness was a felt lack of community – such clients were often separated from the communities they had formed while experiencing homelessness and housed in developments where other residents had never experienced homelessness, leading the clients to feel unwelcome and unsupported.

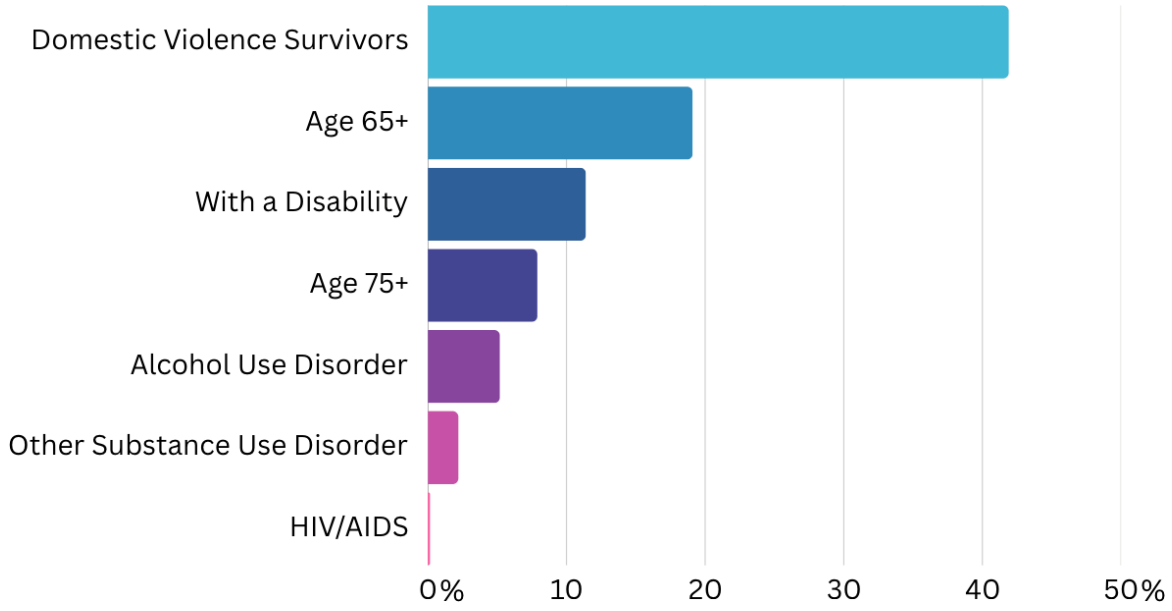
The charts below show that in 2024 36 residents who had been housed in permanent housing returned to homelessness, and 110 residents who had been housed in emergency housing returned to homelessness. In total, 889 clients exited homelessness in Oakland County in 2024, for a rate of 16% of people returning to homelessness. Clients who were housed in permanent housing most often returned to homelessness between three and twelve months after being housed, while clients who exited emergency housing most often returned to homelessness less than one month after exiting. Clients who were able to remain housed for one year showed the lowest rates of returning to homelessness, underlining the importance of long-term or permanent wraparound supportive services.


Returns to Homelessness from PH
2024
2023
7
6
5
4
3
2
1
0
1
3
2
3
5
3
6
7
4
1
1
Less than one week
1 week to one month
1-3 months
3-6 months
6 months to one year
1-2 years

NA-45 NON-HOMELESS SPECIAL NEEDS ASSESSMENT - 91.205 (B,D)

Introduction:

This section discusses the characteristics and needs of people in various subpopulations in Oakland County who may require supportive services, including people with HIV/AIDS, seniors, people with disabilities (mental, physical, or developmental), people with alcohol or drug addiction, and survivors of domestic violence. The chart below depicts the approximate percentage of Oakland County residents in each subpopulation.



Describe the characteristics of special needs populations in your community:

ALICE (asset-limited, income-constrained, yet employed)

In order to better understand the needs of low- to moderate-income residents, Oakland County designates a population known as Asset-Limited, Income-Constrained, yet Employed, or ALICE, to designate a population who may be above the poverty line and yet still unable to meet their basic needs. The current ALICE threshold for Oakland County is an annual household income of $47,800 per year or less, and the Oakland-

Livingston Human Service Agency (OLSHA) reports that approximately 125,247 households, or 24% of all households, fall into this category[2].

Elderly and frail elderly

According to 2019-2023 American Community Survey estimates, about 19.1% of Oakland County's population is elderly (age 65 and over) and about 7.9% of the population is considered frail elderly (age 75 and over). About 19.7% of Oakland County residents aged 65-74 and over and 45.0% of residents aged 75 and over have one or more disabilities.

People with disabilities

An estimated 11.4% of Oakland County residents had at least one disability as of 2023. People with disabilities may require specialized housing with accessibility modifications such as wheelchair ramps, visual rather than auditory fire alarms, and more.

People with HIV/AIDS and their families

According to AIDSVu, an interactive mapping tool from Emory University's Rollins School of Public Health, an estimated 210 out of every 100,000 people in Michigan were living with HIV as of 2023[3], and 8 out of every 100,000 people were diagnosed with HIV in 2023. When considering Oakland County's population, this equates to about 2,160 people living with HIV and 102 people newly diagnosed with HIV per year.

Persons with alcohol or drug addiction

The region of Michigan including Oakland County had an estimated 4.2% rate of alcohol use disorder in the past year for individuals ages 12 and older, according to 2016-2018 data from the U.S. Substance Abuse & Mental Health Data Archive (SAMHDA)[4]. About 1.9% of the region's population was estimated to have used cocaine and 0.2% to have used heroin in the past year, per the 2016-2018 data. Accounting for 2023 population estimates, this equates to approximately 57,250 people with alcohol use disorder, 24,175 people using cocaine, and 2,545 people using heroin within Oakland County.

Survivors of domestic violence

The Michigan State Police Department maintains data on domestic violence reporting and shows that in 2024, 17,830 women, 7,703 men, and 11 people of unreported genders experienced domestic violence, for a total of 25,544 people (roughly 70%

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[2] https://www.olhsa.org/Portals/0/files/OLHSA_CNA_Final%20(2).pdf

[3] https://map.aidsvu.org/profiles/county/orange-county-ca-california/overview

[4] https://datatools.samhsa.gov/saes/substate

women and 30% men)[5]. This means that in 2024, roughly 2% of Oakland County's population (2.8% of women and 1.2% of men) experienced a domestic violence event that they reported to the police. However, this data only includes incidents that were reported to the police – Emory University reports that as few as 20% of domestic violence incidents are reported, and that only 1 in 5 people who are injured by domestic violence seek medical attention.

The National Intimate Partner and Sexual Violence Survey 2016-2017 report, conducted and published by the CDC, states that 39.5% of women and 44.3% of men in Michigan will experience physical violence by an intimate partner in their lifetimes[6]. When applied to the population of Oakland County, this means that more than 255,000 women and 280,000 men have or will experience intimate partner violence.

What are the housing and supportive service needs of these populations and how are these needs determined?

The primary housing and supportive service needs of these subpopulations (the elderly, persons with disabilities, persons with HIV/AIDS and their families, persons with alcohol or drug addiction, survivors of domestic violence, and reentry populations) were determined by input from housing and service providers and the public through public meetings and stakeholder interviews, as well as through a review of research on housing and service needs of specific populations.

Housing that is affordable, accessible, safe, and low-barrier

Residents with special needs often live at or below the federal poverty level. High housing costs make it difficult for these populations to afford housing. Low incomes force many residents to live in congregate care, have roommates, or live with family. The OLHSA 2024-2027 Needs Assessment reports a widespread need for affordable rental housing, especially for seniors, disabled residents, and low-income families.

There is a need to increase the availability of affordable housing for populations with special needs. This could include options such as smaller housing units; multifamily 'missing middle' housing, including duplexes, triplexes, quadraplexes, and other small housing types that support increased levels of affordability.

Housing may be inaccessible to populations with special needs for a variety of reasons. Persons with disabilities may find that their housing options are not ADA compliant or are outside the service range for public transportation. As discussed in previous sections, Oakland County residents with disabilities are disproportionately more likely to be homeless or residents of publicly supported housing than residents without

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[5] https://www.michigan.gov/msp/divisions/cjic/dashboard-portal/crime-dashboard
[6] https://www.cdc.gov/nisvs/documentation/NISVS-2016-2017-State-Report-508.pdf

disabilities, indicating that significant barriers to affordable, accessible housing exist for this group.

People living with HIV/AIDS, immigrants and refugees, people with criminal histories, and other populations with special needs are often discriminated against in housing application processes. People living with HIV/AIDS have a particular need for low-barrier housing that is free from requirements surrounding drug testing, sobriety, criminal background, and medical appointments. For these reasons, there is a need to ensure that accessible, low-barrier housing is available and to take actions to reduce discrimination, such as providing fair housing services.

The elderly, people with disabilities, and others who may not have access to vehicles often need housing that is disability-accessible and near to transportation, recreation, and employment. In general, special needs populations require housing options that are intentionally integrated into the community to provide access to needed services and to reduce social isolation. Like other populations with special needs, people living with HIV/AIDS also need housing that provides easy access to health services, resources, and employment.

Finally, housing that is safe and clean is of special concern for people with special needs. Units that are not clean or have other unhealthy conditions can worsen health issues for people who are already vulnerable. The OLHSA 2024-2027 Needs Assessment Report notes needs related to requirements for landlords to better maintain properties and needs for repairs on aging units, particularly among low-income homeowners.

Transportation

Access to transportation is an important concern for people with special needs. Seniors and people with disabilities and others who may not have access to vehicles need housing close to transportation services to access employment, health services, and recreation opportunities – the OLHSA 2024-2027 Needs Assessment found that a lack of transportation access prevented many residents from being able to work or access appointments or supportive services, as well as preventing them from being able to carry out basic daily tasks. Youth, seniors, and residents in rural areas were noted as groups of special concern.

Specialized housing and services

Specialized housing addresses the needs of specific populations. People with physical, intellectual, or developmental disabilities; people living with HIV/AIDS; and people with alcohol or drug addiction have specific housing needs that may be addressed through housing with wraparound services, such as case management, life skills programming, and health services. The Housing First model, which is recommended by HUD,

emphasizes that supportive services should not be required for people to access housing.

The OLHSA 2024-2027 Needs Assessment found a specific need for easily accessible mental health services as well as for increased coordination between public service providers, noting that a current lack or organization surrounding service coordination and outreach makes it difficult for residents to navigate the various available resources.

Workforce development and employment services

Special needs populations may also need workforce development and employment services. These programs may include employment navigation, job training, education, transportation services, and case management focused on employment, among others. The OLA 2024-2027 Needs Assessment noted a specific need for financial literacy and credit improvement education in order to help residents achieve upward mobility.

Physical and mental healthcare access

Access to healthcare is a need for special needs populations, as they are more likely to experience barriers such as economic disadvantage; medical issues and disability; language and literacy age; and cultural, geographic, or social isolation. To increase access to healthcare, it is important for local governments and stakeholders to take steps to define, locate, and reach at-risk populations. This need overlaps significantly with the need for transportation, as the OLSHA report noted that a lack of transportation frequently causes elderly, youth, and rural residents to miss or be unable to schedule appointments.

Technology access

The OLSHA 2024-2027 Needs Assessment noted that a lack internet access and digital literacy were frequently cited as barriers that prevented residents from accessing existing services. Service providers who were consulted during the Consolidated Planning Process also reported this barrier, noting that residents experiencing homelessness especially faced significant barriers in accessing and remaining in supportive services due to a lack of consistent internet or electronic device access.

Education and combating stigmas

Combating stigmas is an important concern for people with special needs. For adults with criminal histories and people living with HIV/AIDS, discrimination may make accessing adequate housing difficult. Additionally, a lack of understanding regarding the transmission of HIV may cause people to lose housing or employment, thus increasing the risk of homelessness.

Outreach

Outreach to special needs populations to ensure they are aware of available services is another need. Clarity in marketing and in public buildings about what services are available is important in supporting awareness of available services among vulnerable populations. Outreach also includes the development of relationships and trust so that people feel comfortable seeking out needed services. The OLSHA report noted a specific need for increased outreach collaboration among service providers in order to bring services to more residents.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

Data for HIV/AIDS cases specific to Oakland County is unavailable. Because of this, it may be useful to examine State level data. According to AIDSVu, an interactive mapping tool from Emory University's Rollins School of Public Health, an estimated 210 out of every 100,000 people in Michigan were living with HIV as of 2023[7], and 8 out of every 100,000 people were diagnosed with HIV in 2023. When considering Oakland County's population, this equates to about 2,160 people living with HIV and 102 people newly diagnosed with HIV per year.

If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))

N/A

[7] https://map.aidsvu.org/profiles/county/orange-county-ca-california/overview

NA-50 NON-HOUSING COMMUNITY DEVELOPMENT NEEDS – 91.215 (F)

Describe the jurisdiction's need for Public Facilities:

Buildings open to the general public or for use by target special needs populations, whether owned by the government or by nonprofit organizations, may be considered public facilities under the CDBG program. Community survey participants were asked to rank the need for public facilities within Oakland County on a scale from no need to critical need, and the following public facilities were identified as the top three with the highest level of need: (1) **parks and recreational facilities**; (2) **childcare or disabled adult care centers**; and (3) **senior or community centers**.

Input from community meetings, focus groups, and interview participants supported survey findings. One common theme described by stakeholders consulted was that parks and recreation facilities with Oakland County are unequally distributed and kept, and that some are unsafe to use.

How were these needs determined?

These public facility needs were determined based on input from stakeholders gathered through research, interviews, focus groups, public meetings, and a community survey. Needs were also determined through a review of other local plans and studies. For a list of stakeholders and organizations that participated in this Consolidated Plan process, see Table 2.

Describe the jurisdiction's need for Public Improvements:

Community survey participants were asked to rank the need for public infrastructure improvements within Oakland County on a scale from no need to critical need, and the following improvements were identified as the top three with the highest level of need: (1) **street improvements**; (2) **flood or drain improvements;** and (3) **sidewalk improvements.**

Input from community meetings, focus groups, and interview participants supported survey findings. One common theme described by stakeholders consulted was that infrastructure investments seem unequally distributed in some areas of the County.

How were these needs determined?

These public improvement needs were determined based on input from stakeholders gathered through research, interviews, focus groups, public meetings, and a community survey. Needs were also determined through a review of other local plans and studies.

For a list of stakeholders and organizations that participated in this Consolidated Plan process, see Table 2.

Describe the jurisdiction's need for Public Services:

Community survey participants were asked to rank public services by importance, and the following services were identified as the top three with the highest level of importance: (1) **homeless services**; (2) **home repair or improvement assistance**; and (3) **homebuyer assistance.**

Input from community meetings, focus groups, and interview participants supported survey findings. Common needs identified by stakeholders included:

- There is a substantial need both for more emergency home repair resources for low-income residents and for better advertising of existing resources.
- There is substantial need for increased wraparound and other supportive services for people experiencing homelessness in Oakland County.
- Low-income homebuyers and homebuyers who do not speak English fluently frequently face high barriers in the homebuying process, and there is a significant need for more homebuyer assistance programs.

How were these needs determined?

These public service needs were determined based on input from stakeholders gathered through research, interviews, focus groups, public meetings, and a community survey. Needs were also determined through a review of other local plans and studies. For a list of stakeholders and organizations that participated in this Consolidated Plan process, see Table 2.

OAKLAND COUNTY MICHIGAN
NEIGHBORHOOD & HOUSING DEVELOPMENT

2026-2030

Housing Market Analysis

MA-05 OVERVIEW

Housing Market Analysis Overview:

While housing choices can be fundamentally limited by household income and purchasing power, the lack of affordable housing can be a significant hardship for low- and moderate-income households, preventing them from meeting other basic needs. Stakeholders and residents reported that affordable housing for families and individuals is a severe issue in Oakland County, with housing prices increasing significantly over the last several years.

In addition to reviewing the current housing market conditions, this section analyzes the availability of assisted and public housing and facilities to serve homeless individuals and families. It also analyzes local economic conditions and summarizes existing economic development resources and programs that may be used to address community and economic development needs identified in the Needs Assessment.

Key Findings

- A large percentage of housing units in the county were built prior to 1980, indicating an aging housing stock that may be in need of repair and rehabilitation
- Renter-occupied housing units are more likely than owner-occupied units to exhibit two or more housing problems, indicating greater need among renters

MA-10 NUMBER OF HOUSING UNITS – 91.210(A)&(B)(2)

Introduction

An estimated 379,151 housing units are located in Oakland County, according to the 2016-2020 five-year American Community Survey (see Table 28). The largest share of units are single-family detached structures (72%), followed by units in small multifamily buildings of 5 to 19 units (9%). About 15% of the county's units are in large multifamily buildings (20 or more units); duplexes, triplexes, and fourplexes; and single-unit attached units. Mobile homes, RVs, and vans make up 4% of residences in the county.

An estimated 76% of the county's units are owner-occupied, and 24% are renter-occupied (see Table 29). Almost all owner-occupied housing in the county has at least two bedrooms: 14% of units have two bedrooms, and 85% have three or more bedrooms. Rental units tend to be smaller: 3% of units are studios, and 26% are one-bedroom units. The most common rental unit contains two bedrooms (44%), while slightly more than one-quarter (27%) of renters live in units with three or more bedrooms.

All residential properties by number of units

TABLE 28 – RESIDENTIAL PROPERTIES BY UNIT NUMBER

Property Type	Number	%
1-unit detached structure	272,165	72%
1-unit, attached structure	24,738	7%
2-4 units	14,424	4%
5-19 units	34,417	9%
20 or more units	19,109	5%
Mobile Home, boat, RV, van, etc	14,298	4%
Total	379,151	100%

DATA SOURCE: 2016-2020 ACS

Unit Size by Tenure

TABLE 29 – UNIT SIZE BY TENURE

	Owners		Renters	
	Number	%	Number	%
No bedroom	311	0%	2,665	3%
1 bedroom	2,401	1%	22,530	26%
2 bedrooms	37,420	14%	37,068	44%
3 or more bedrooms	233,464	85%	22,960	27%
Total	273,596	100%	85,223	100%

DATA SOURCE: 2016-2020 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

The Ferndale Housing Commission serves low-income individuals and families through its Housing Choice Voucher program, which distributes an estimated 984 vouchers in the county. Additional HCVs are also distributed through the Michigan State Housing Development Authority (MSHDA).

The HUD LIHTC database also indicates that there are approximately 4,417 LIHTC units in the county's entitlement jurisdiction, 3,950 of which are set aside for low-income households.

Public Housing

The Ferndale Housing Commission owns and manages two properties that provide public housing for low- and moderate-income households: Autumn House and Withington West.

Autumn House is a 55-unit multifamily development located at 500 East Nine Mile Road that is primarily comprised of one-bedroom units. There are five (5) two-bedroom units. The development was constructed in 1974.

Withington West is a 68-unit multifamily development located at 415 Withington St constructed in 1982. All of its units are one-bedroom units. This development houses the Ferndale Housing Commission's main business office.

Low Income Housing Tax Credit Properties

Additional assisted housing in Oakland County includes several Low Income Housing Tax Credit (LIHTC) properties. According to HUD's LIHTC database, there are a total of 29 properties providing 4,417 housing units within the county, typically targeting households with incomes of 50 to 60% AMI or below, adjusted by family size. LIHTC developments include a mix of family and senior projects, and may include additional funding sources, such as Project-Based Section 8 subsidies.

Housing Choice Vouchers

According to HUD's A Picture of Subsidized Households (APSH) data, there are about 4,072 voucher holders in use in Oakland County. Housing Choice Vouchers are targeted to households with incomes at or below 50% AMI, adjusted by family size, with an emphasis on serving households within incomes under 30% AMI. They are distributed statewide by MSHDA, along with several local public housing agencies that serve cities or townships.

Oakland County Home Improvement Program

The County has a Housing Improvement Program that is available to anyone with income limits at or below 80 percent of the AMI. The Water Resources Commissioner office also offers a Hardship Assistance Program for residents who may need assistance paying water or sewer bills or needed plumbing repairs.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

Several trends exist that, absent policies focused on preserving the county's existing affordable housing stock and developing diverse new housing options, indicate that Oakland County will continue to experience a loss of affordable housing inventory. Trends include high levels of demand for housing due to population growth in the county; increasing home values and median rents over the past 10 years; a shortage in the supply of rental and homeowner housing units affordable to households with incomes below 50% HAMFI; and aging housing stock in need of rehabilitation. MSHDA and local public housing authorities will continue to administer Housing Choice Vouchers in Oakland County.

Federal law requires any LIHTC properties awarded credits after 1989 to maintain affordability for 30 years, although after the first 15 years, owners can leave the program through a relief process. After 30 years (or 15 years if owners are granted regulatory relief), properties can be converted to market-rate units. During the 2026-2030 Five-Year Consolidated Plan, four (4) LIHTC properties in Oakland County are expected to age out of the 30-year affordability period: Pebble Creek Place, Meadows

of Auburn Hills, Pine Lake Apartments, and American House Troy. Together, these properties offer 528 units of low-income housing. As LIHTC units age past their required 30-year affordability period, the County and its partners may want to consider potential approaches to retain these properties as income-restricted housing.

Additionally, fourteen (14) properties with Section 8 project-based vouchers will face the end of their 20-year contract during the 2026 to 2030 period but are eligible for renewal by HUD. These developments include: Independent Supportive Housing Oakland I-III, Pontiac Plains Apartments, Detroit Baptist Manor, Springhill II and III, Pontiac Village Estates, Village of Holly Woodlands II, Meadow Creek Village, McDonald Senior Apartments, Devon Square, and Highland Meadowview I. Together, these properties offer a total of 661 units of affordable housing.

Does the availability of housing units meet the needs of the population?

Cost burden data shows that housing affordability needs are particularly severe for renters with incomes under 80% of HUD Area Median Family Income (HAMFI), and in particular for those with incomes under 30% HAMFI. An estimated 27,878 renter households with incomes below 80% HAMFI are housing cost burdened, spending more than 30% of income on housing (see Table 9). Renters with incomes of 50% HAMFI and below make up 74% of these cost-burdened renter households.

On the ownership side, income and home value data indicate that starter home prices in the county are out of reach for many moderate- and middle- income households. Based on American Community Survey 5-Year Estimates for 2019-2023, the median home value of owner-occupied units in Oakland County is $320,400, up 27% from the 2016-2020 median of $252,800, and up 49% from the 2005-2009 median of $214,600. Affordability data in the Needs Assessment also shows affordability challenges, with cost burdens impacting households with incomes up to 100% HAMFI. Stakeholders interviewed during this planning process also described an increasingly tight housing market due to high demand for housing and insufficient new housing under development, noting the need to increase the supply of housing for both rental and homeownership units to support housing affordability in the county. In addition to the need to increase housing supply, stakeholders noted the need to assist property owners in making needed repairs to housing units to support housing affordability and quality.

Describe the need for specific types of housing:

Data discussed in the Housing Need Assessment and in this section indicate a particular need for rental and for-sale housing that is affordable to low- and moderate-income households. Housing types that allow for increased affordability of both rental and homeownership units might include options such as smaller housing units; multifamily ‘missing middle housing, including duplexes, triplexes, quadruplexes, and

other small multifamily units; accessory dwelling units; cohousing with shared services; or tiny homes. Rehabbing units that are aging, dilapidated, or that have poor energy efficiency can also increase the number of high-quality affordable units.

MA-15 HOUSING MARKET ANALYSIS: COST OF HOUSING - 91.210(A)

Introduction

This section reviews housing costs and affordability in Oakland County. The median home value in the county was estimated at $252,800 as of the 2016-2020 American Community Survey 5-year estimates (see Table 30), representing a 41% increase over the 2009 median value of $178,900. More recent 2019-2023 ACS 5-Year estimates show that the median value of owner-occupied units in the county stands at $320,400, a 27% increase from 2016-2020 estimates. This data indicates steep increases in home prices in recent years and barriers to homeownership for lower-income residents. As home values and interest rates have increased, renting is generally more accessible to low-to-moderate income families in Oakland County than homeownership.

The median contract rent in the county was $951 at the time of the 2016-2020 ACS estimates, a 20% increase since 2009. As of the 2019-2023 ACS, the median contract rent was $1,157, indicating a 22% increase since the 2016-2020 ACS. This data indicates that rents have increased dramatically within the past few years as well, creating additional housing barriers for lower-income residents.

The need for the preservation of existing affordable housing and the development of new affordable units was one of the most commonly identified housing issues in the county, with data and local perceptions both indicating affordability issues, particularly for households with incomes below 80% of the area median income. Data from Table 6 and Table 9 indicates that more than half of all Oakland County households earning 80% or below the area median income experience cost burdens (60,062 out of 103,243 total households, or 58%). Ability to afford housing is tied to other needs identified in the county, including homelessness, housing and services for people with disabilities, senior housing, and availability of housing for people re-entering the community from long-term care facilities or other institutions.

Cost of Housing

TABLE 30 – COST OF HOUSING

	Base Year: 2009	Most Recent Year: 2020	% Change
Median Home Value	178,900	252,800	41%
Median Contract Rent	795	951	20%

DATA SOURCE: 2000 CENSUS (BASE YEAR), 2016-2020 ACS (MOST RECENT YEAR)

TABLE 31 - RENT PAID

Rent Paid	Number	%
Less than $500	8,657	10.2%
$500-999	36,439	42.8%
$1,000-1,499	25,871	30.4%
$1,500-1,999	7,903	9.3%
$2,000 or more	6,304	7.4%
Total	85,174	100.0%

DATA SOURCE: 2016-2020 ACS

Housing Affordability

TABLE 32 – HOUSING AFFORDABILITY

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	3,931	No Data
50% HAMFI	12,981	11,756
80% HAMFI	37,485	41,082
100% HAMFI	No Data	64,396
Total	**54,397**	**117,234**

DATA SOURCE: 2016-2020 CHAS

Monthly Rent

TABLE 33 – MONTHLY RENT

Monthly Rent ($)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	$639	$764	$977	$1,266	$1,376
High HOME Rent	$639	$764	$977	$1,266	$1,376
Low HOME Rent	$639	$736	$883	$1,020	$1,138

DATA SOURCE: 2020 HUD FMR AND HOME RENTS

Is there sufficient housing for households at all income levels?

Table 32 estimates the number of units in the county that are affordable to renters and owners at a variety of income levels, which can be compared to the number of households at each income level, as provided in Table 8 of the Needs Assessment.

According to CHAS estimates, there are 14,228 renters with incomes under 30% HAMFI, but only 3,931 rental units affordable at that income level are reported in Table 32. Thus, there is insufficient rental housing for households with extremely low incomes. At other income levels, there appears to be a sufficient number of renter units affordable to renter households at that income level. However, these figures do not take into account unit condition or size; nor do they reflect the possibility that a unit that would be

affordable to a low- or moderate-income household may be unavailable to them because it is occupied by a higher income household. Community engagement indicated a need for additional affordable rental housing units at a variety of price points, especially those affordable to extremely low-income households, low- and moderate-income households. Input from young professionals with incomes above 80% AMI indicating a lack of affordable housing, even at income levels beyond those addressed through HUD grant funds.

Turning to owners, there are an estimated 17,186 owner households with incomes at or below 50% HAMFI in the county, but Table 32 reports only 11,756 owner-occupied housing units affordable at that income level. This leaves a deficit of 5,430 affordable owner-occupied units. At the next income levels there appear to be adequate affordable units. As with rental housing, these figures do not take into account housing size or condition, or the possibility that higher or lower income households are occupying units within this cost range.

The National Low Income Housing Coalition's Out of Reach data examines rental housing rates relative to income levels for counties and metro areas throughout the U.S. To afford a two-bedroom rental unit at the Oakland County Fair Market Rent (FMR) of $1,378 without being cost burdened would require an annual wage of $55,120. This amount translates to a 40-hour work week at an hourly wage of $26.50 or 2.1 full-time minimum wage jobs. At the county's average renter wage of $22.78, one would need to work about 47 hours a week to afford a two-bedroom apartment at Fair Market Rent.

How is affordability of housing likely to change considering changes to home values and/or rents?

Data from the American Community Survey and stakeholder input both indicate that housing values and rents have increased sharply in recent years. Affordability has, in turn, decreased for both renters and owners. High demand for housing, development of new housing that has not kept up with high demand, and a lack of rental and for-sale housing affordable to residents with incomes less than 30% to 50% AMI all indicate that housing affordability is likely to continue as a pressing issue in Oakland County.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

Table 33 shows HUD's Fair Market Rents and HOME rents for Oakland County. The county's median contract rent of $951 falls below the FMR and high HOME rents for two-, three-, and four-bedroom units.

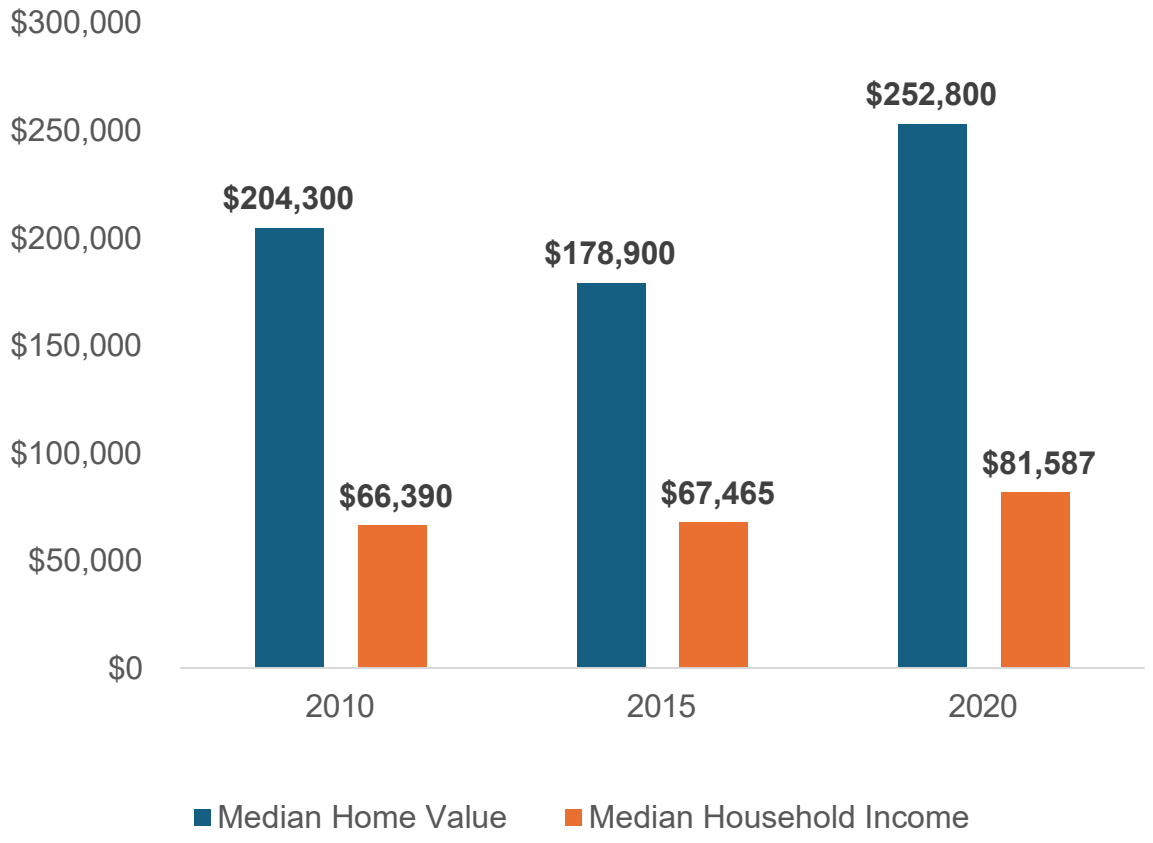
As of the 2016-2020 ACS data, about 53% of rental units in Oakland County have rents under $1,000, which falls under the FMR and HOME rents for units with two bedrooms

or less. As noted in the previous section, about 70% of rental units have 2 bedrooms or more. Combined, these figures suggest that housing choice voucher holders would be able to access a variety of units, given the share of housing renting for less than FMRs.

Note that this data does not reflect housing conditions, which are an important consideration. While the rent may be affordable, substandard housing conditions may make a unit unsafe or lead to exceptionally high utility costs, negating any savings in rent as compared to a more expensive unit. Additionally, housing choice voucher holders may have difficulty finding units that will accept vouchers or difficulty qualifying for leases due to past evictions or credit history.

Discussion

FIGURE 2. MEDIAN HOME VALUE AND MEDIAN HOUSEHOLD INCOME IN OAKLAND COUNTY, 2010 TO 2020



MA-20 HOUSING MARKET ANALYSIS: CONDITION OF HOUSING – 91.210(A)

Introduction

This section examines the condition of housing in Oakland County, including the presence of selected housing conditions: 1) lack of complete plumbing facilities, (2) lack of complete kitchen facilities, (3) more than one person per room, and (4) cost burden greater than 30%. This section also examines the age of housing stock, vacancy rate and suitability of vacant housing for rehabilitation, and the risk of lead-based paint hazards.

Renters in Oakland County are more likely than owners to experience one or more of the selected housing conditions. About 38% of renter-occupied units and 18% of owner-occupied units have at least one of the conditions described above (see Table 34). CHAS data discussed in the Needs Assessment indicates that cost burdens are by far the most common housing condition. About 18% of owner-occupied units in the county have one selected condition (48,550 units), and about 0.1% have two or more selected conditions (433 units). In contrast, 38% of renter-occupied units have one selected condition (32,020 units), and 1.5% have two or more selected conditions (1294 units). These figures indicate that rental units are more likely to be physically substandard (i.e., lack a complete kitchen or plumbing).

Age of housing reflects periods of development in Oakland County. The area contains a significant supply of housing built prior to 1980, of which 151,206 units are owner-occupied (55% of owner-occupied units) and 47,920 are rental units (56% of rental units) (see Table 35). Owner-occupied units are more likely than rental units to have been built in 2000 or later (16% and 13%, respectively), while renters are more likely than owners to occupy housing built from 1950 to 1979. While some older units may be well-maintained, the considerable share of housing built prior to 1980 indicates potential need for rehabilitation assistance.

Describe the jurisdiction's definition of "standard condition" and "substandard condition but suitable for rehabilitation":

For the purpose of this Consolidated Plan, Oakland County defines units to be in “standard condition” if they meet HUD Section 8 housing quality standards. A unit is defined as “substandard” if it lacks complete plumbing, a complete kitchen, or heating fuel (or uses heating fuel that is wood, kerosene, or coal). A unit is “substandard but suitable for rehabilitation” if it lacks complete plumbing, a complete kitchen or a reliable

and safe heating system but has some limited infrastructure that can be improved upon. These units are likely to have deferred maintenance and may have some structural damage such as leaking roofs, deteriorated interior surfaces, and inadequate insulation. They may not be part of public water or sewer systems but will have sufficient systems to allow for clean water and adequate waste disposal.

There are an estimated 12,898 housing units in Oakland County (2.4% of all units) that are vacant for reasons other than being for rent; rented but not occupied; for sale; sold but not occupied; for seasonal, recreational, or occasional use; or for migrant workers, according to 2016-2020 ACS data. The county does not have counts of units that are substandard, substandard but suitable for rehabilitation, abandoned, or real estate owned (REO properties), as this would require evaluating units on a house-by-house basis. In general, however, units with more than one substandard condition and older units are more difficult to rehabilitate. A rough assessment of conditions can be made by considering housing age and absence of basic amenities.

Condition of Units

TABLE 34 - CONDITION OF UNITS

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	48,550	18%	32,020	38%
With two selected Conditions	384	0%	1,189	1%
With three selected Conditions	45	0%	105	0%
With four selected Conditions	4	0%	0	0%
No selected Conditions	224,660	82%	51,909	61%
Total	**273,643**	**100%**	**85,223**	**100%**

DATA SOURCE: 2016-2020 ACS

Year Unit Built

TABLE 35 – YEAR UNIT BUILT

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	42,582	16%	11,125	13%
1980-1999	79,856	29%	26,190	31%
1950-1979	116,507	43%	39,904	47%
Before 1950	34,699	13%	8,016	9%
Total	273,644	101%	85,235	100%

DATA SOURCE: 2016-2020 CHAS

Risk of Lead-Based Paint Hazard

TABLE 36 – RISK OF LEAD-BASED PAINT

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	151,206	55%	47,920	56%
Housing Units build before 1980 with children present	22,624	8%	17,862	21%

DATA SOURCE: 2016-2020 ACS (TOTAL UNITS) 2016-2020 CHAS (UNITS WITH CHILDREN PRESENT)

Vacant Units

TABLE 37 - VACANT UNITS

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units			
Abandoned Vacant Units			
REO Properties			
Abandoned REO Properties			

TABLE 38 - VACANT UNITS (ALTERNATE)

	Number	Percent of Total Housing Units
For rent	8,664	1.6%
Rented, not occupied	1,315	0.2%
For sale only	3,328	0.6%
Sold, not occupied	1,969	0.4%
For seasonal, recreational, or occasional use	4,331	0.8%
For migrant workers	0	0.0%
Other vacant	12,898	2.4%
Total Vacant Units	32,505	6.0%

DATA SOURCE: 2016-2020 ACS

Need for Owner and Rental Rehabilitation

An assessment of the region's housing conditions can provide a basis for developing policies and programs to maintain and preserve the quality of the housing stock. The age of housing can have a substantial impact on housing conditions and costs. As

housing ages, maintenance costs rise, which can present significant affordability issues for low- and moderate-income homeowners. Aging rental stock can lead to rental rate increases to address physical issues or deteriorating conditions if building owners defer or ignore maintenance needs. Deteriorating housing can also depress neighboring property values, discourage reinvestment, and eventually impact the quality of life in a neighborhood. Homes built prior to 1950 have a high likelihood of containing lead-based paint. However, the use of lead-based paint did not end until 1978 and may affect an even larger number of households.

Development of new market-rate and subsidized housing units can support housing affordability and reduce displacement of lower-income residents. In contrast, areas with growing populations in which few new housing units are built tend to experience housing shortages and reduced affordability. Subsidized units, such as those built with low-income housing tax credits and other federal and state subsidies, have been found to be particularly protective in reducing displacement.

Data on age of housing in Oakland County points to a large share of older housing stock and a decline in construction of new units since 2000 (Table 35). An estimated 55% of units in the county are in structures built prior to 1980. The older housing stock in the county may pose both economic and public health challenges, particularly for individuals and families living in older housing units.

Data regarding housing conditions indicates that 433 owner-occupied units (less than 1% of total owner-occupied units) in the county have at least two housing conditions, which are likely to include cost burdens and one other condition (overcrowding, lack of complete kitchen, or lack of complete plumbing). Additionally, 34,699 owner-occupied housing units (13% of total owner-occupied units) in the county were built before 1950, indicating the highest risk for deferred maintenance and rehabilitation need. A total of 116,507 units of owner-occupied housing (43% of total owner-occupied units) in the county were built between 1950 and 1980, and as this housing ages, maintenance needs will continue to grow.

Owners are less likely to lack complete kitchens or plumbing and therefore are less likely to live in substandard housing. However, housing age indicates that some owner-occupied units are at risk of deferred maintenance and may currently or in the near future be in need of some rehabilitation, given that 151,206 units (55% of total owner-occupied units) were built prior to 1980. Additionally, seniors living on Social Security or retirement income who have paid off their mortgages may now be unable to afford necessary repairs and maintenance as their homes age.

A total of 8,016 rental housing units in the county (9% of total rental units) were built before 1950, and 39,904 units were built between 1950 and 1980 (47% of total rental units). Further, a greater number of rental units (1,294) than owner units (433) have at least two housing conditions, likely including cost burdens and at least one other

housing condition. Combined, these factors indicate that while there is a high level of need for rehabilitation of both renter- and owner-occupied housing, renters in Oakland County experience the highest levels of need.

Estimated Number of Housing Units Occupied by Low- or Moderate-Income Families with LBP Hazards

Exposure to lead-based paint represents one of the most significant environmental threats from a housing perspective. Housing conditions can significantly affect public health, and exposure to lead may cause a range of health problems for adults and children. The major source of lead exposure comes from lead-contaminated dust found in deteriorating buildings, including residential properties built before 1978 that contain lead-based paint.

Unfortunately, measuring the exact number of housing units with lead-based paint hazards is difficult. However, risk factors for exposure to lead include housing old enough to have been initially painted with lead-based paint (i.e., pre-1978), households that include young children, and households in poverty. Table 36 identifies the total number of housing units in Oakland County built before 1980 and the total number of renter and owner units built before 1980 that house children under age 6. This includes 22,624 owner-occupied units (8% of all owner-occupied housing units) and 17,862 renter-occupied units (21% of total renter-occupied housing units) with at least two risk factors for exposure to lead-based paint (built before 1980 and housing young children).

MA-25 PUBLIC AND ASSISTED HOUSING – 91.210(B)

Introduction

Public housing within the Oakland County consortium is provided through nine different Housing Commissions under the jurisdictions of its various member communities. The sum total of units and vouchers available within Oakland County are depicted below via HUD's comprehensive database.

Note: The tables within this section contain data provided by HUD that represents combined statistics for the Ferndale Housing Commission, Madison Heights Housing Commission, Michigan State Housing Development Authority, Plymouth Housing Commission, Pontiac Housing Commission, Royal Oak Housing Commission, Royal Oak Township Housing Commission, South Lyon Housing Commission, and Southfield Housing Commission. Oakland County is presenting the data as provided by HUD; however, the County acknowledges that it may include data on housing and/or residents outside the County's entitlement jurisdiction.

Totals Number of Units

TABLE 39 – TOTAL NUMBER OF UNITS BY PROGRAM TYPE

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	333	861	28,371	847	24,532	2,313	1,190	2,397
# of accessible units									

DATA SOURCE: PIC (PIH INFORMATION CENTER)

*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Describe the supply of public housing developments:

Oakland County does not administer a Public Housing Authority; however, several communities within the County operate participating PHAs. As shown above there are a total of 861 public housing units available throughout the jurisdiction, in addition to approximately 28,371 voucher-based units and 333 mod-rehab units.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

HUD's Real Estate Assessment Center (REAC) conducts physical property inspections of properties that are owned, insured, or subsidized by HUD, including public housing and multifamily assisted housing. About 20,000 such inspections are conducted each year to ensure that assisted families have housing that is decent, safe, sanitary, and in good repair. Inspections are scored using a scale of 1 to 100. A passing score for a REAC Physical Inspection is 60 or above.

There are three letters (A-C) that may follow the score, as well as an asterisk (*). Their meaning is as follows:

· A: No health and safety deficiencies noted

· B: Non-life-threatening health and safety deficiencies noted

· C: At least one life-threatening health and safety deficiency noted

* At least one inoperable smoke detector noted

Although data provided by HUD depicts a total of 861 public housing units available within Oakland County, HUD REAC scores indicate only two public housing developments inspected within Oakland County. The names and inspection scores of these units are depicted below:

Public Housing Condition

TABLE 40 - PUBLIC HOUSING CONDITION

Public Housing Development	Inspection Score	Inspection date
Autumn House	72	10/5/2022
Unnamed Development (10149 Pasadena Ave)	59	9/13/2023

No letter scores were provided in the REAC report. Scores indicate that Autumn House, run by the Ferndale Housing Commission, received a passing score while and unnamed development, run by the Royal Oak Township Housing Commission, received a failing score.

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

An unnamed development located at 10149 Pasadena Avenue in Ferndale received a failing inspection score in 2023; however, no reason or additional information was given on deficiencies present in the development.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

Oakland County's participating housing authorities will continue to seek funding from a variety of sources in order to improve the living environment of public housing residents, increase assisted housing choices, and expand housing opportunities.

MA-30 HOMELESS FACILITIES AND SERVICES – 91.210(C)

Introduction

A range of facilities provide housing and services to support people experiencing homelessness in Oakland County, including emergency, transitional, and permanent supportive housing. This section provides an overview of shelter facilities, housing, and mainstream and other services that aim to meet the needs of people experiencing homelessness in Oakland County based on HUD Housing Inventory Count data for the Pontiac, Royal Oak/Oakland County CoC, supplemental data available from the Alliance for Housing, service provider input, stakeholder feedback, and other data when available.

Note: The Alliance for Housing functions as the Continuum of Care for Oakland County; however, for the purpose of annual Point-in-Time (PIT) and Housing Inventory Count (HIC) reports, the Oakland County Continuum of Care is known as MI-504: the Pontiac, Royal Oak/Oakland County CoC. Annual Housing Inventory Count data presented in the table below comes from this group.

Facilities and Housing Targeted to Homeless Households

TABLE 41 - FACILITIES AND HOUSING TARGETED TO HOMELESS HOUSEHOLDS

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year-Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	155	N/A	61	704	N/A
Households with Only Adults	87	42	12	440	N/A
Chronically Homeless Households	N/A	N/A	N/A	212	N/A
Veterans	N/A	N/A	N/A	111	N/A
Unaccompanied Youth	7	N/A	19	0	N/A
TOTAL	**249**	**42**	**78**	**1,144**	**N/A**

Source: HUD 2024 Continuum of Care Homeless Assistance Programs Housing Inventory Count Report, MI-504

Describe mainstream services, such as health, mental health, and employment services to the extent those services are use to complement services targeted to homeless persons

Oakland County has a variety of mainstream services that are used to complement targeted services for people experiencing homelessness. The Continuum of Care focuses on supporting coordination and collaboration among these systems so that people experiencing homelessness can access mainstream resources to assist them in transitioning to and remaining stable in permanent housing. In 2023, McLaren Physician Partners compiled a comprehensive list of mainstream services available in the County in the following categories:

- Abuse & Protective Services
- Adult Aging Services
- Disability & Special Needs Resources
- Emergency & Disaster Services
- Financial Assistance
- Food Pantries, Clothing & Household
- Healthcare Services
- Housing Assistance
- Legal Assistance
- Libraries
- Parenting & Pregnancy Resources
- Prescription Assistance
- Support Groups
- Transportation
- Tribal Services
- Veterans Affairs

The comprehensive resource guide with information for each category may be viewed here:
https://www.mclaren.org/Uploads/Public/Documents/MPHO/documents/community-linkage/2023/2023%20Oakland%20County%20Community%20Resource.pdf

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

The Alliance for Housing provides the following information about emergency shelter facilities within Oakland County:

- **Lighthouse Sanctuary** - Safe, 24-hour emergency shelter for runaway, human trafficked, or at-risk youth between the ages of 10 -17 for up to 3 weeks. Youth receive round the clock supervision, intensive individual and family case management/counseling, group counseling, life skills, and access to peer support. The focus of support services at the shelter is aimed toward Family Reunification.
- **Lighthouse Shelter** - Has 18 units (1-bedroom, 2- bedroom and some units that can be turned into a 3-bedroom if available) for individuals with child(ren) or families with child(ren) for up to 90 days. The program provides case management to work towards stable housing, referrals, budgeting, and increase of income.
- **HAVEN** - Residential program is Oakland County's only 24-hour emergency shelter exclusively for domestic violence and sexual assault survivors and their children.
- **HOPE Shelters** - The shelter is a 62-bed co-ed facility, offering showers, meals and service navigation.
- **HOPE Recuperative Shelter**-a 15-bed facility offering medical oversight, meals, and service navigation to guests with acute physical and mental health conditions who have been discharged from area hospitals.
- **South Oakland Citizens for the Homeless (SOCH)/Welcome Inn** - The only day warming center in the county. Additionally, there is a low-barrier overnight rotating shelter made up of 6 churches 37 beds for singles for a maximum stay of up to 90 days, which operates from December-March.

In addition, Oakland County newly maintains both a website and a mobile phone app known as Shelter Oakland, through which anyone seeking services may search for emergency, transitional, or permanent housing openings. The website depicts the locations of facilities on a map and provides a current list of bed openings and may be viewed at the following link: https://shelteroakland.com/

The Oakland County Emergency Management Department maintains a visual map and list of warming and cooling centers. Residents can click on a center's icon on the map to find out more information on each facility. This website may be viewed at the following link:https://www.oakgov.com/community/emergency-management/need-to-know/safety/warming-and-cooling-centers

In addition to these facilities and services, the following were mentioned by stakeholders and service providers who were interviewed during the community engagement process:

- The Baldwin Center: offers laundry facilities, shower and hygiene products, a family soup kitchen, food donations, winter hats and gloves, and a program called Wellness Wednesdays which features a weekly rotation of services such as housing resources, career and employment support, community navigation, legal aid, Secretary of State services, and medical care.
- Julie's List: a comprehensive searchable online database maintained by St. Joseph's Helpers which lists education, employment, financial, food, goods, health, housing, legal, transportation, and other supportive resources nationwide, including Oakland County.
- Welcome Inn Day Center: a low-barrier day center offering resources such as food, clothing, and hygiene items, as well as limited night shelter in the winter months.
- PantryNet: a searchable online database of food pantries and soup kitchens nationwide, including Oakland County.

MA-35 SPECIAL NEEDS FACILITIES AND SERVICES – 91.210(D)

Introduction

This section discusses the characteristics and needs of people in various subpopulation in Oakland County who may require supportive services, including people with HIV/AIDS, seniors, people with disabilities (mental, physical, or developmental), people with alcohol or drug addiction, and survivors of domestic violence. For a more complete description of these populations, see NA-45.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Housing

The OLHSA 2024-2027 Needs Assessment found a specific need for easily accessible mental health services as well as for increased coordination between public service providers, noting that a current lack or organization surrounding service coordination and outreach makes it difficult for residents to navigate the various available resources.

Workforce development and employment services

Special needs populations may also need workforce development and employment services. These programs may include employment navigation, job training, education, transportation services, and case management focused on employment, among others. The OLA 2024-2027 Needs Assessment noted a specific need for financial literacy and credit improvement education in order to help residents achieve upward mobility.

Physical and mental healthcare access

Access to healthcare is a need for special needs populations, as they are more likely to experience barriers such as economic disadvantage; medical issues and disability; language and literacy age; and cultural, geographic, or social isolation. To increase access to healthcare, it is important for local governments and stakeholders to take steps to define, locate, and reach at-risk populations. This need overlaps significantly with the need for transportation, as the OLSHA report noted that a lack of transportation frequently causes elderly, youth, and rural residents to miss or be unable to schedule appointments.

Technology access

The OLSHA 2024-2027 Needs Assessment noted that a lack internet access and digital literacy were frequently cited as barriers that prevented residents from accessing existing services. Service providers who were consulted during the Consolidated Planning Process also reported this barrier, noting that residents experiencing homelessness especially faced significant barriers in accessing and remaining in supportive services due to a lack of consistent internet or electronic device access.

Education and combating stigmas

Combating stigmas is an important concern for people with special needs. For adults with criminal histories and people living with HIV/AIDS, discrimination may make accessing adequate housing difficult. Additionally, a lack of understanding regarding the transmission of HIV may cause people to lose housing or employment, thus increasing the risk of homelessness.

Outreach

Outreach to special needs populations to ensure they are aware of available services is another need. Clarity in marketing and in public buildings about what services are available is important in supporting awareness of available services among vulnerable populations. Outreach also includes the development of relationships and trust so that people feel comfortable seeking out needed services. The OLSHA report noted a specific need for increased outreach collaboration among service providers in order to bring services to more residents.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Hope Recuperative Shelter, located in Pontiac, provides a “discharge to home” option for patients being discharged from a hospital into homelessness. This center is staffed by nurses who provide patient monitoring and education and provides patients with case management services in order to ensure that they have housing, legal resources, and vital documents such as an ID or birth certificate.

Service providers consulted during the Consolidated Planning process noted that Hope Recuperative Shelter has intake criteria including independence in daily living activities, but that the majority of hospital referrals received are for patients who do not meet these criteria. Providers noted that only 11 out of the last 60 referrals received by Hope Recuperative Shelter were for appropriate patients and that the shelter has experienced instances of nursing homes attempting to dump patients. Providers also noted that stigma against nursing homes constitutes a significant barrier to care – many individuals require more intensive care than Hope Shelter can provide and should be discharged into a nursing home, but are unwilling to go.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

During the upcoming 2026 program year, Oakland County will continue expanding its housing and supportive service to meet the needs of residents who are not homeless, but who have other special needs. Beginning with the competition of Shepherd House, a 53-unit permanent supportive housing development in Ferndale funded in part with HOME resources. This project provides long term, service-enriched housing for individuals with disabilities and other special needs who require ongoing support to maintain stability.

In addition, the County has an additional 166 units of affordable housing currently under construction, with anticipated completion in PY2026 or early the following program year.

These developments include:

- Two communities in Pontiac, serving low income households, seniors, and persons with disabilities
- One community in Southfield, designed to expand accessible and service linked housing options

Link One Year Goal: These efforts support our one-year goal 1 to increase the supply of affordable and supportive housing by advancing construction on 166 units and fully leasing Shepherd House to eligible special needs households.

Through a Cross-County effort in conjunction with NHD, Oakland Connects, a free program that helps guide residents through services in the county. A team of certified Community Health Workers are committed to connecting Oakland County residents to programs that support health in all ways including Non-Housing Community Development that expand economic opportunity, improve safety, enhance food access, employment opportunities and provide other assistance.

Oakland Connects is available to anyone who lives or works in Oakland County will provide

- Navigation assistance for residents with disabilities, chronic illnesses, or age-related needs
- Referrals to rental assistance, utility support, transportation, and health services
- Case management to help residents maintain stable housing and avoid entering the homelessness system

One Year Goal Link: NHD in partnership with Oakland Connects supports Non-Housing Community Development efforts by providing coordinated service navigation to at least 1000 special needs households.

In December of 2024 NHD and the Oakland County Health & Human Services (HHS) launched Wellness Wednesdays to further our shared mission of connecting community and health care organizations to coordinate resources for people experiencing homelessness or in need of assistance. Wellness Wednesdays occurs every Wednesday from 10:30 a.m. to 12:30 p.m. in partnership with the Baldwin Center located at 212 Baldwin Ave in Pontiac alongside several community organizations. Oakland County residents in need of health, housing, employment and community resources are invited to enjoy a meal while connecting with services.

Since the program's inception on April 2025, Oakland County has provided 2,759 individuals with comprehensive wrap around services through Wellness Wednesdays. These services include 596 guests accessing shower facilities with 538 loads of laundry completed, helping individuals maintain dignity and personal wellbeing. Through on-site partnerships, 141 guests received medical support from Honor Health, while 173 residents were connected to resources through Oakland Connects. Housing stability efforts remain central to the program, with 228 individuals receiving housing counseling and 69 guests assisted by Community Housing Network. Additionally, 40 residents received targeted support from Lighthouse. Collectively, these services demonstrate the County's commitment to providing coordinated, person-centered assistance that addresses the diverse needs of residents and strengthens pathways to long term stability. These programs help stabilize residents who may be at risk of homelessness.

In January of 2026 the County expanded these efforts with the addition of Friendship Fridays, an extension of Wellenses Wednesdays increasing support service access to Southern Oakland County residents in Royal Oak, Michigan. To date we have provided 90 clients with wrap around services through Friendship Fridays.

One Year Goal Link: NHD in partnership with Oakland Connects & the HHS supports Goal 2 by improving Homeless Services and Preventions efforts. These activities also support Goal 4 by delivering basic needs, public & supportive services to at least 1,000 residents.

Oakland County will work closely with community partners to prevent housing instability among residents with special needs, including older adults, persons with disabilities, individuals with chronic health conditions, and survivors of domestic violence. The County's efforts will focus on early identification, targeted intervention, and coordinated service delivery.

Action to address this include:

- Identifying residents at risk of losing housing due to disability, aging, health needs, or economic hardship
- Connecting individuals to housing/rental counseling, legal aid, and emergency financial assistance to stabilize their housing situation
- Ensuring residents are aligned with assistance programs
- Strengthening partnerships with disability service agencies, senior service organizations, behavioral health providers, domestic violence service providers, and faith based and nonprofit organizations
- Improving cross agency communication and referrals to ensure residents receive comprehensive, wrap around support tailored to their needs

One-Year Goal Link: Prevent housing loss and increase prevention efforts through Goal 2.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

During the next program year, the 52 participating communities within the Oakland County HOME Consortium will undertake a broad array of projects and services to support residents who are not homeless but who have other special needs. These include seniors, persons with disabilities, survivors of domestic violence, youth, and low-income households requiring assistance to maintain safe, stable housing and access essential services.

Activities include, but are not limited to; Minor / Mobile Home Repair Programs, Parks & Recreation upgrades, Removal of Architectural Barriers (ADA ramps, bathroom modifications, accessibility retrofits), Code Enforcement to maintain safe, healthy living environments, Senior Centers, Domestic Violence and Crisis Intervention Services, Fire Station Equipment and Public Services such as Senior Services, Transportation Services, Yard Services to support safety and accessibility around the home, Youth Assistance Programs, Emergency Services & Meals on Wheels.

MA-40 BARRIERS TO AFFORDABLE HOUSING – 91.210(E)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Oakland County's 2020 Analysis of Impediments to Fair Housing Choice (AI) identifies several challenges related to housing affordability and access as county's barriers to fair housing choice. The AI also includes a review of the county's existing zoning code and identifies policies that may limit the development of affordable housing in the region.

Housing problems and limited access to homeownership disproportionately impact protected classes

Analysis of 2008-2017 homeownership data from the Housing Mortgage Disclosure Act (HMDA) showed that the mortgage denial rate in Oakland County is disproportionately among Black and African American households, who had an average denial rate of 29%. This denial rate was significantly higher than the county's overall average of 15%. Comparatively, White households had the county's lowest average denial rate at 13%.

Additionally, Comprehensive Housing Affordability Strategy (CHAS) data analysis on housing needs performed in this Consolidated Plan revealed that Black households exhibited disproportionately high rates of housing problems compared to the county as a whole.

Disparate patterns in lending, moderate to high levels of segregation, insufficient affordable housing in a range of unit sizes, racial minority households with disproportionate rates of housing problems, insufficient accessible affordable housing, and discrimination on the basis of disability were all identified as high priority contributing factors that impacted fair housing choice in the county's latest AI.

Zoning, Affordability, and Housing Choice

Although zoning ordinances and land use codes play an important role in regulating the health and safety of the built environment, overly restrictive codes can negatively impact housing affordability and fair housing choice within a jurisdiction. A Land Use Planner Survey of jurisdictions' zoning codes and land use regulations was conducted to identify any barriers that might impede access to housing. This survey found that most jurisdictions define the word "family" as related by blood, marriage, or adoption or "related" in any other traditional sense, which may limit access to housing choice. In addition, few jurisdictions actively encourage affordable housing development or inclusionary policies.

Barriers to housing access in the private market

In addition to these public-sector barriers, the private market can also create barriers. Some landlords may refuse to rent units to households receiving other forms of housing assistance. This practice, known as source of income discrimination, reduces the affordability of existing units in the private housing stock and creates barriers to

obtaining affordable housing. While source of income discrimination is illegal in the state of Michigan, many residents still struggle to find landlords willing to accept Section 8 or Housing Choice Vouchers for reasons ranging from stigma and discrimination to landlord concern about the potential for added cost. Housing Choice Vouchers make up a significant portion of publicly supported housing within Oakland County and are a key element in providing affordable housing to the county's most vulnerable populations. Because of this, landlord reluctance presents a significant barrier to affordable housing.

MA-45 NON-HOUSING COMMUNITY DEVELOPMENT ASSETS – 91.215 (F)

Introduction

This section outlines employment, labor force, and educational attainment data that informs the Consolidated Plan's priorities and goals.

Economic Development Market Analysis

Business Activity

TABLE 42 - BUSINESS ACTIVITY

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	782	954	0	0	0
Arts, Entertainment, Accommodations	40,470	53,645	10	11	1
Construction	15,025	19,713	4	4	0
Education and Health Care Services	71,647	73,171	17	15	-2
Finance, Insurance, and Real Estate	29,270	31,814	7	7	-1
Information	8,651	7,935	2	2	0
Manufacturing	49,839	56,536	12	12	0

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Other Services	13,476	15,851	3	3	0
Professional, Scientific, Management Services	73,419	86,925	18	18	0
Public Administration	0	0	0	0	0
Retail Trade	45,273	62,536	11	13	2
Transportation and Warehousing	9,614	8,019	2	2	-1
Wholesale Trade	22,734	33,021	6	7	1
Total	380,200	450,120	--	--	--

DATA SOURCE: 2016-2020 ACS (WORKERS), 2020 LONGITUDINAL EMPLOYER-HOUSEHOLD DYNAMICS (JOBS)

TABLE 43 - BUSINESS ACTIVITY (ALTERNATE DATA)

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	1,742	911	0	0	0
Arts, Entertainment, Accommodations	51,257	38,027	8	7	-1

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Construction	29,043	18,742	4	4	0
Education and Health Care Services	137,277	125,541	21	25	4
Finance, Insurance, and Real Estate	50,355	41,919	8	8	0
Information	11,183	11,327	2	2	0
Manufacturing	128,219	60,064	20	12	-8
Other Services	27,179	14,484	4	3	-1
Professional, Scientific, Management Services	94,915	93,999	15	18	3
Public Administration	17,471	11,983	3	2	-1
Retail Trade	62,926	53,224	10	10	0
Transportation and Warehousing	19,643	13,513	3	3	0
Wholesale Trade	15,497	27,023	2	5	3
Total	646,707	450,120	--	--	--

DATA SOURCE: 2016-2020 ACS (WORKERS), 2020 LONGITUDINAL EMPLOYER-HOUSEHOLD DYNAMICS (JOBS)

Labor Force

TABLE 44 - LABOR FORCE

Total Population in the Civilian Labor Force	489,218
Civilian Employed Population 16 years and over	468,480
Unemployment Rate	4.23
Unemployment Rate for Ages 16-24	13.95
Unemployment Rate for Ages 25-65	2.62

DATA SOURCE: 2016-2020 ACS

TABLE 45 – OCCUPATIONS BY SECTOR

Occupations by Sector	Number of People
Management, business and financial	177,984
Farming, fisheries and forestry occupations	12,186
Service	35,894
Sales and office	96,519
Construction, extraction, maintenance and repair	22,209
Production, transportation and material moving	17,048

DATA SOURCE: 2016-2020 ACS

Travel Time

TABLE 46 - TRAVEL TIME

Travel Time	Number	Percentage
< 30 Minutes	240,084	57%
30-59 Minutes	149,208	35%
60 or More Minutes	31,218	7%
Total	420,510	100%

DATA SOURCE: 2016-2020 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

TABLE 47 - EDUCATIONAL ATTAINMENT BY EMPLOYMENT STATUS

Educational Attainment	In Labor Force		
	Civilian Employed	Unemployed	Not in Labor Force
Less than high school graduate	9,628	777	7,287
High school graduate (includes equivalency)	49,950	2,778	19,959
Some college or Associate's degree	102,440	4,026	25,924
Bachelor's degree or higher	223,300	5,226	37,820

DATA SOURCE: 2016-2020 ACS

Educational Attainment by Age

TABLE 48 - EDUCATIONAL ATTAINMENT BY AGE

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	482	974	1,172	3,045	5,409
9th to 12th grade, no diploma	6,522	2,328	3,343	6,868	6,657
High school graduate, GED, or alternative	20,664	14,371	13,564	44,770	37,541
Some college, no degree	27,119	22,145	19,049	49,379	31,010
Associate's degree	2,993	8,654	9,274	23,946	11,352
Bachelor's degree	11,940	39,318	37,400	77,009	30,132
Graduate or professional degree	873	22,717	32,157	57,949	29,242

DATA SOURCE: 2016-2020 ACS

Educational Attainment – Median Earnings in the Past 12 Months

TABLE 49 – MEDIAN EARNINGS IN THE PAST 12 MONTHS

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	1,021,880
High school graduate (includes equivalency)	1,776,862
Some college or Associate's degree	2,171,375
Bachelor's degree	3,591,465
Graduate or professional degree	4,498,802

DATA SOURCE: 2016-2020 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The employment sectors in Oakland County with the largest numbers of jobs are professional, scientific, and management services (86,925 jobs or 18% of all jobs); education and health care services (73,171 jobs or 15%); and retail trade (62,536 jobs or 13%). The largest shares of Oakland County residents are employed in professional, scientific, and management services (73,419 workers or 18% of all workers); education and health care services (71,647 workers or 17%); and manufacturing (49,839 workers or 12%). The jobs in which the most county residents are employed reflect the major employment sectors with the exception of manufacturing, where numbers suggest a notable number of Oakland County residents travel outside the county for their work in this sector.

Describe the workforce and infrastructure needs of the business community:

Oakland County is a part of the seven counties that make up the Southeast Michigan Council of Governments (SEMCOG), which is currently in the process of its five year update to its current 2021 Comprehensive Economic Development Strategy (CEDS), *Increasing Shared Prosperity for a Resilient Economy: Comprehensive Economic Development Strategy for Southeast Michigan*. According to this plan's SWOT analysis of the region's strengths, weaknesses, opportunities, and threats (SWOT), the business community's most pressing needs include a need for infrastructure updates to the region's roads, bridges, and streets, transit network, and broadband internet. Additionally, there is a growing deficiency between the skills of the workforce and those needed by employers, further exacerbated by mass retirements of an aging baby boomer population and a lack of career pathways for in-demand occupations due to the growing costs and barriers associated with higher education.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

Several factors shape economic development in Oakland County and the region. The SEMCOG's CEDS details six (6) economic development strategies and policies that will help the region meet its current and future needs:

- Creating and marketing quality places

- Anticipating demands for land use
- Investing in critical infrastructure
- Fostering a competitive business climate
- Advancing technology, innovation, and entrepreneurship
- Preparing and connecting talent with jobs

Investments in workforce development, education, and entrepreneurship are already occurring in Oakland County through organizations such as Oakland County Michigan Works!, which provides workforce development services for job seekers, employers, and youth across the county. With six (6) offices throughout the county in Novi, Oak Park, Pontiac, Southfield, Troy, and Waterford, Oakland County residents can get connected with business apprenticeships, paid internships, professional development workshops, certification classes, and more.

Additionally, Oakland County has several economic development programs meant to support non-profit organizations, businesses, corporations, and investors. These include the Apprenticeships Funding Program, Property Assessed Clean Energy (PACE) Financing, SBA 504 Loan Program, CEED Lending, and the Oakland County Economic Development Corporation (EDC).

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

About 24% of the county's population aged 18 and over have a high school education or less, while 48% have a bachelor's degree or higher, according to American Community Survey data for 2016-2020 (Table 48).

The SEMCOG's latest 2021 CEDS noted a growing deficiency between the skills of the workforce and those needed by employers, further exacerbated by mass retirements of an aging baby boomer population and a lack of career pathways for in-demand occupations due to the growing costs and barriers associated with higher education. As more desirable, high paying jobs require levels of education above a high school diploma, there is a need to continue to focus on connecting residents with opportunities to pursue higher education.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

Workforce development programs in Oakland County focus on training workers in high-demand, well-paying industries and connecting job seekers with regional employers in these sectors.

Organizations such as Oakland County Michigan Works! provides a variety of employment and workforce training opportunities through partnerships with local businesses and schools. Oakland Community College's Department of Economic and Workforce Development also offers a wide range of programs and training opportunities for students, residents, and businesses, including employee training courses, apprenticeships, certifications, and online personal development courses.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)? If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

Yes, Oakland County participated in the development of *Increasing Shared Prosperity for a Resilient Economy: Comprehensive Economic Development Strategy for Southeast Michigan (2021)* prepared by Southeast Michigan Council of Governments (SEMCOG). The strategy serves as the Comprehensive Economic Development Strategy (CEDS) in accordance with the U.S. Economic Development Administration's requirements, and as a guide for policies, programs, and investments to support economic development in the region.

Activities that the County anticipates undertaking over the next five years will support several of the strategies listed in the CEDS, including investment in workforce and economic development, public facilities, and infrastructure improvements. In particular, one of the goals of the CEDS is to support the region's human capital development by accessing resources for a well-prepared, skilled professional and technical workforce. The County will continue to invest in human capital and workforce development through programs such as Oakland County Michigan Works!, which supports residents in gaining training and certifications in industries that provide living-wage jobs. Oakland County will also continue to work with local and regional stakeholders, such as SEMCOG and the Oakland County Economic Development Department to continue planning for and investing in critical workforce and economic development programs.

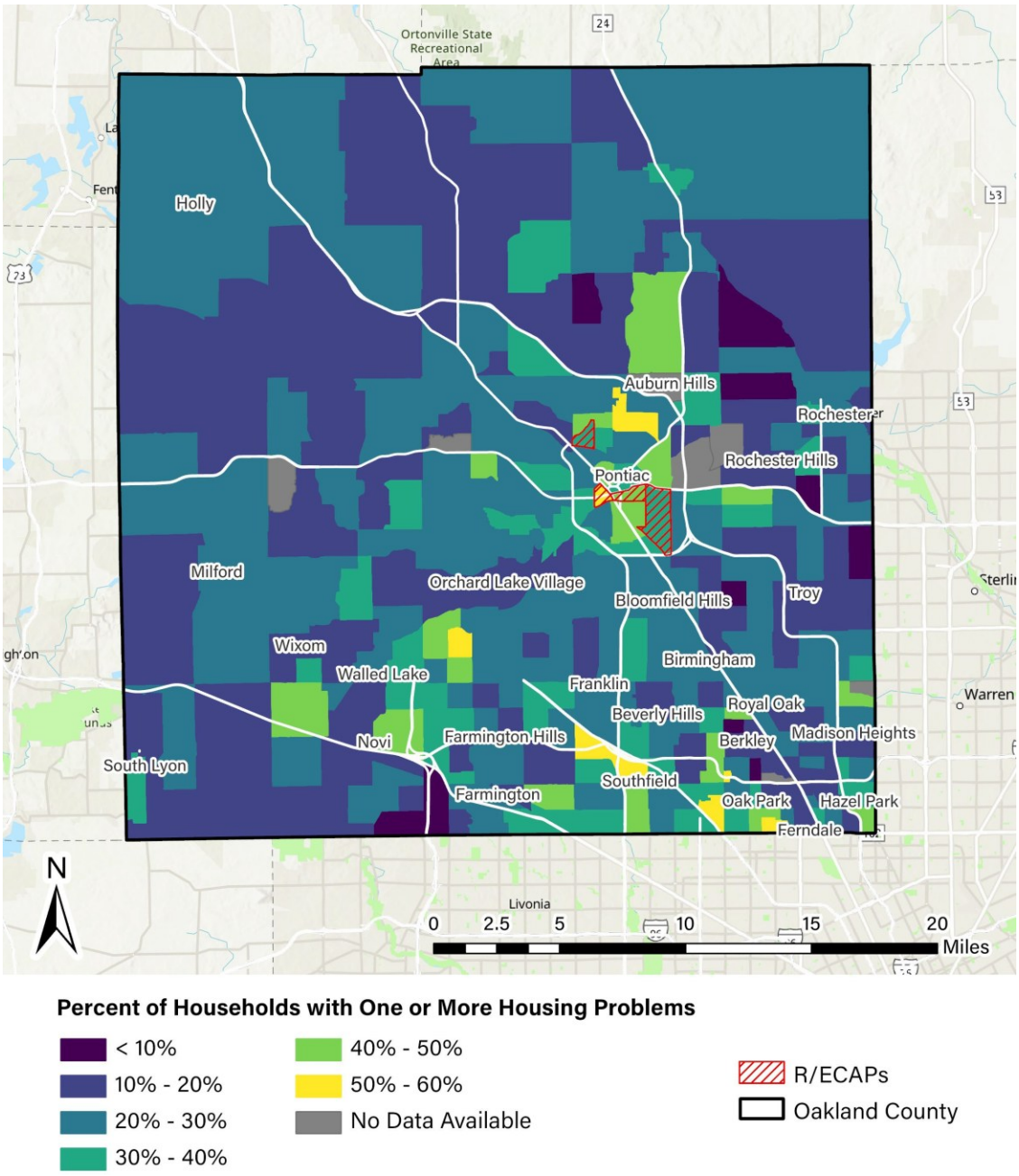
MA-50 NEEDS AND MARKET ANALYSIS DISCUSSION

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

HUD defines four types of housing problems: (1) cost burden of more than 30%, (2) more than 1 person per room, (3) lack of complete kitchen facilities, and (4) lack of complete plumbing facilities. The map below of housing needs in Oakland County shows the share of households within each census tract that have least one of these housing problems.

A concentration of households with housing needs is defined as a census tract where more than 40% of households have at least one housing need. Using this definition, there are thirty three (33) census tracts within the county that have a concentration of housing problems. Ten (10) of these tracts have rates of housing problems that are 50% or more. They are located in Oak Park, Southfield, and Pontiac, indicated by yellow in Figure 3 below. Census tracts where more than 40% of households have a housing need are generally located in areas of the county that are populated predominantly by Black/African American residents.

FIGURE 3. PERCENT OF HOUSEHOLDS WITH HOUSING PROBLEMS



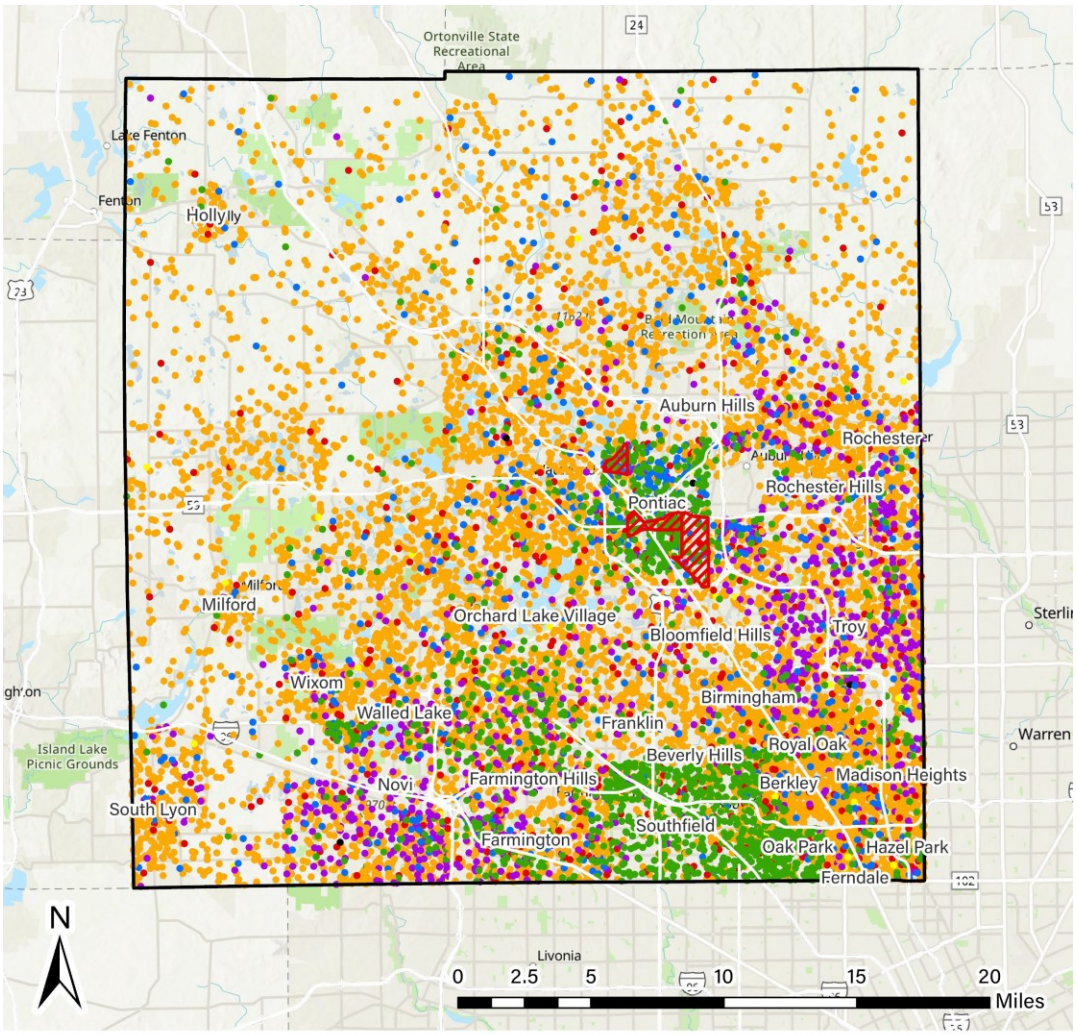
Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

According to the latest ACS data, White and Black/African American residents comprise the two largest racial and ethnic population groups in Oakland County, making up 69% and 13% of the county's population, respectively. There is some clustering of Black residents in the city of Pontiac and southern Oakland County, including the cities of Southfield and Oak Park (see Figure 4). There is also some clustering of Asian/Pacific Islander residents around the cities of Novi and Troy.

One census tract in the county, tract 9813, has a poverty rate of 100%, though the total population of 11 is quite low. This tract encompasses Oakland University, located in Auburn Hills and Rochester, and may explain the unusually high tract poverty rate. Disregarding this tract, there are four (4) other census tracts in the county with poverty rates above 40%, all located in the city of Pontiac (see Figure 5). They are tracts 1412, 1421, 1422, and 1423, with poverty rates ranging from 46.9% to 55.3%.

In its fair housing planning guidance, HUD defines racially or ethnically concentrated areas of poverty (R/ECAPs) as areas where more than one-half of the population is not White, and the individual poverty rate is over 40% or more than three times the poverty rate of the MSA, whichever threshold is lower. Based on the most recent 2019-2023 ACS data, the four census tracts mentioned above are all considered R/ECAPs.

FIGURE 4. RACE AND ETHNICITY IN OAKLAND COUNTY



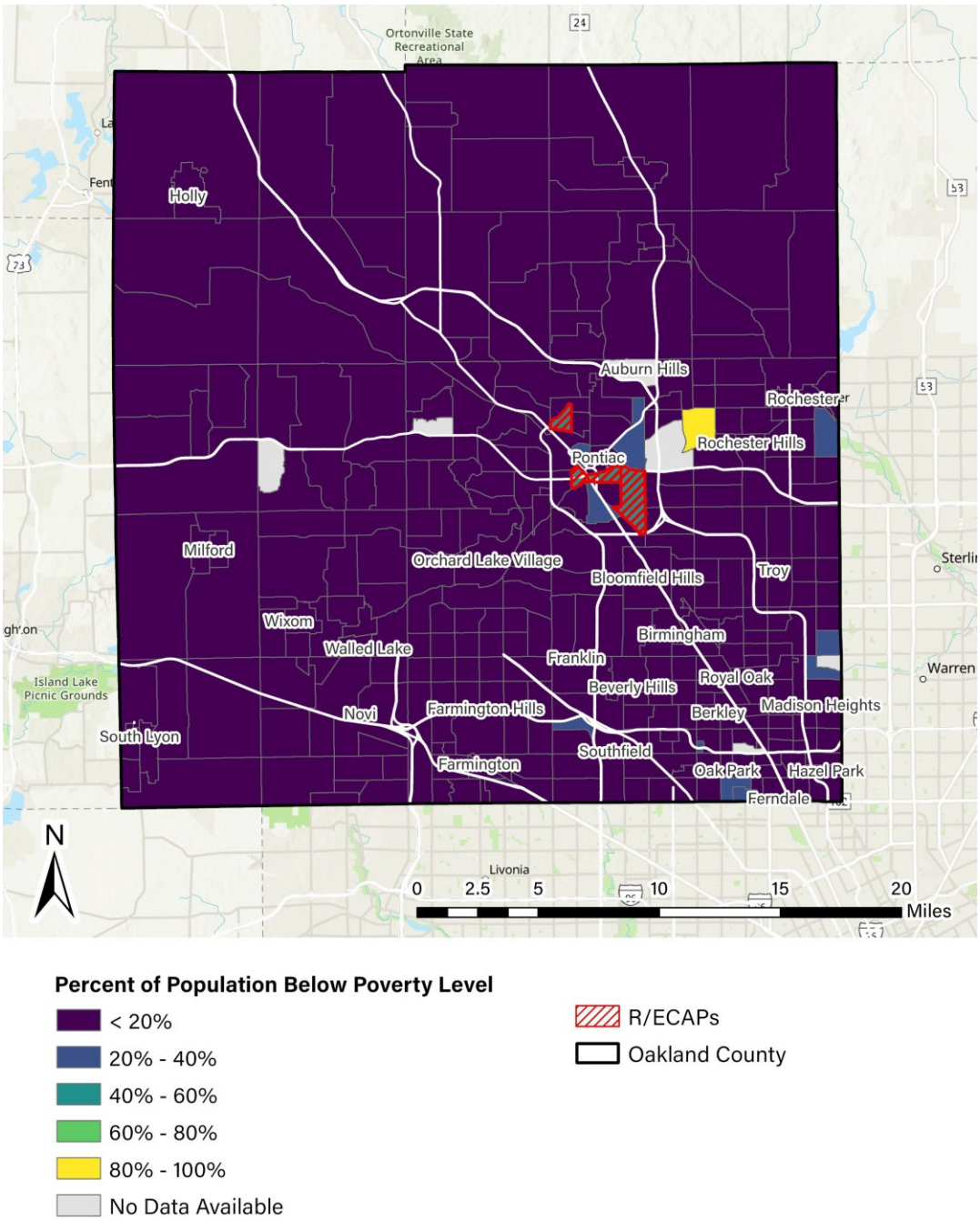
Race and/or Ethnicity

1 Dot = 100 People

- White
- Black or African American
- Hispanic or Latino
- Native American
- Asian or Pacific Islander
- Some Other Race
- Two or More Races

- R/ECAPs
- Oakland County

FIGURE 5. POVERTY RATES IN OAKLAND COUNTY



Percent of Population Below Poverty Level

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- 80% - 100%
- No Data Available

- R/ECAPs
- Oakland County

What are the characteristics of the market in these areas/neighborhoods?

Single-family homes are the predominant housing type in tracts 1412, 1421, and 1423 (comprising 23%, 43%, and 34% of all housing units in each tract, respectively). Large multifamily apartment complexes of 50 units or more are the predominant housing type in tract 1422, comprising 37% of the tract's housing stock, compared to single-family homes, which make up 32%. Households living in these census tracts are also more likely to be renters than owners.

Households in these census tracts have significantly lower median household income ($22,114) and homeownership rate (22%) relative to the county as a whole. Despite these challenges, the area is home to several community resources and is located next to many of the county's civic, cultural, and educational resources.

Are there any community assets in these areas/neighborhoods?

The county's R/ECAPs are located in close proximity to several community assets, including downtown Pontiac, which is home to many schools, an office of the Michigan Department of Health and Human Services (MDHHS), the social services organization Lighthouse, the Pontiac Creative Arts Center, the Pontiac School District Office, and the City of Pontiac's city hall.

Are there other strategic opportunities in any of these areas?

Though the city of Pontiac is not part of Oakland County's CDBG entitlement jurisdiction, it is home to many social services organizations and institutional offices that connect county residents with the resources, programs, and services needed to thrive. The downtown region of Pontiac is supported by the non-profit economic development group Main Street Pontiac, which is focused on reinvestment in the area, establishing a diverse, resilient local economy, and preserving the area's historic character. The city of Pontiac is also classified as a Qualified Opportunity Zone and a Historically Underutilized Business Zones (HUBZone), which offers benefits to businesses and investors.

MA-60 BROADBAND NEEDS OF HOUSING OCCUPIED BY LOW- AND MODERATE-INCOME HOUSEHOLDS - 91.210(A)(4), 91.310(A)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

Broadband connectivity is a vital community resource that offers citizens access to employment, education, and other personal enrichment opportunities found through the internet. In 2015, the FCC defined broadband as internet access with download speeds of 25 Megabits per second (Mbps) and upload speeds of 3 Mbps (otherwise noted as 25/3). With broadband access, internet users can partake in file downloading, video streaming, email, and other critical features necessary for online communication.

Disparities in broadband access – particularly for low-to-moderate households – can create a "digital divide" that limits users' personal and professional opportunities. The FCC reports that "Internet adoption appears to have an even stronger correlation to health outcomes, even after controlling statistically for other potentially confounding factors, such as education, income, and rurality"[8], meaning that a lack of internet access disproportionately impacts health and possibly even lifespan of low- and moderate-income communities. In addition, a lack of internet access can intensify other barriers to upward mobility, such as education, employment, and general access to information and resources.

A 2024 study from the Pew Research Center found that only 57% of very low-income households and 76% of low- to moderate-income households reported having high-speed internet access at home, in comparison to 95% of households in the highest income bracket[9]. This is especially troubling in a post COVID era – A 2021 report from the Pew Research Center noted that 90% of American adults viewed internet access as important or essential in completing daily tasks post COVID[10], while another 2021 Pew report found that as many as 30% of US students and 10% of teachers lacked adequate internet access to transfer to online learning during the COVID-19 pandemic[11]. Finally, a 2024 report from the National Bureau of Economic Research found that increased high-speed internet access resulted in a reduction in mental and physical health

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[8] https://www.fcc.gov/health/sdoh/studies-and-data-analytics

[9] https://www.pewresearch.org/internet/2024/01/31/americans-use-of-mobile-technology-and-home-broadband/

[10] https://www.pewresearch.org/internet/2021/09/01/the-internet-and-the-pandemic/

[11] https://www.edweek.org/technology/acting-fcc-chair-the-homework-gap-is-an-especially-cruel-reality-during-the-pandemic/2021/03

conditions as well as a reduction in deaths from suicide by increasing economic conditions as “zip codes that gain access to broadband internet see increases in the numbers of employees and establishments “[12].

In Michigan, the State High-Speed Internet Office found the following[13]:

- Students with high-speed, home internet access have an **overall grade point average of 3.18**. This is significantly higher than the average 2.81 GPA for students with no home access and 2.75 average for student with only cell phone access.
- Increased access to the internet can help **address issues of isolation among older adults**. Studies have shown that isolation is associated with worse health outcomes and even premature death among adults age 50 and over.
- Effective use of telemedicine can **reduce hospitalizations of nursing home patients** and reduce health care costs.
- Small businesses that have websites **have higher annual revenues** and are more likely to have recently hired one or more employees than similar businesses that aren't online. Those that use social media weekly are three times more likely to have hired recently than those that don't.
- A study of manufacturers found that **40% said they were able to add new customers and 57% said they saved money** because of their high-speed internet connection.
- Farmers who gain high-speed internet access **experience an average 6% increase in farm revenue**.
- Having a home broadband connection gives households an **estimated economic impact of $1,850 per year**.

With these facts in mind, broadband access is an important factor in building and promoting equity and accessibility among low- and moderate-income residents.

There are three considerations to be taken into account in assessing internet access: (1) need for broadband wiring and for connections to broadband service; (2) competitive pricing and service resulting from having more than one internet service provider within an area; and (3) affordability of broadband service for low- and moderate-income households. In order to meet growing broadband needs, the State of Michigan established the Michigan Broadband Internet Office in June 2021. This office is tasked to pursue the following goals:

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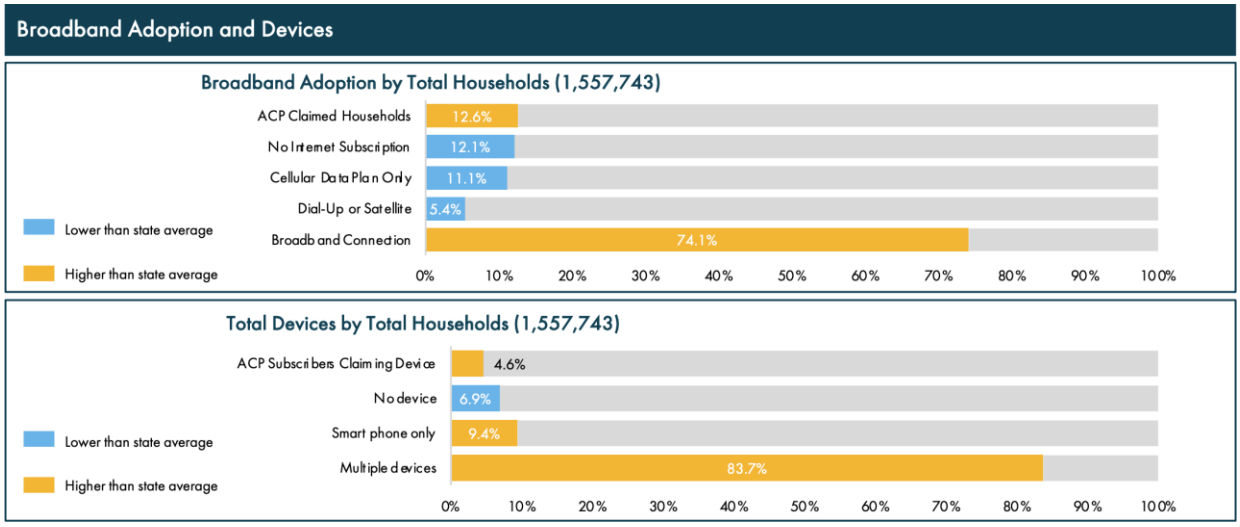
[12] https://www.nber.org/papers/w32517

[13] https://www.michigan.gov/leo/bureaus-agencies/mihi

- Ensure that high-speed internet access is available to every home, business, institution, and community
- Ensure that 95% of Michigan households adopt a permanent home internet connection

In order to meet these goals, the MBIO implemented the Broadband Equity, Access, and Deployment (BEAD) Program through a 5-year Action Plan. This plan reports that within the Detroit Metro area, defined within the plan as Macomb, Oakland, and Wayne Counties, approximately 12% of households have no internet connection and another 11% of households have internet connection only through a cellular data plan. Additionally, nearly 7% of households in this area have no electronic devices with which to access the internet.



Source: https://www.michigan.gov/leo/-/media/Project/Websites/leo/Documents/MIHI/BEAD/MIHI-BEAD-Five-Year-Plan.pdf?rev=e917202c68cb4bbf8b2437c524d53345&hash=ED2C11D76DE816FB1D7839BEE194CCA7

Marginalized and/or minority households are generally disproportionately represented among low-to-moderate income households and therefore may be disproportionately impacted by a lack of internet access. The website BroadbandNow, which exists to help people discover internet options in their area, conducts research into broadband availability and user demographics by state and provides data on Michigan households without internet access. This data shows that 34% of extremely low-income households and 16% of low-to-moderate income households in Michigan are without internet; that Black, Native American, and Hispanic residents are substantially more likely than residents of other races to be without internet access; and that seniors are more likely than other residents to be without internet access:

TABLE 50 – HOUSEHOLD BROADBAND ACCESS

Percent of Residents without Internet Access by Age	
Under 18	5%
18-64	6%
65+	8%
Percent of Homes without Internet Access by Income	
Under $20,000	34%
$20,000-$74,999	16%
$75,000+	4%
Percent of Residents without Internet Access by Race/Ethnicity	
Black	10%
White	5%
Hispanic/Latino	7%
Asian/Pacific Islander	3%
Native American	8%
Mixed Race	5%

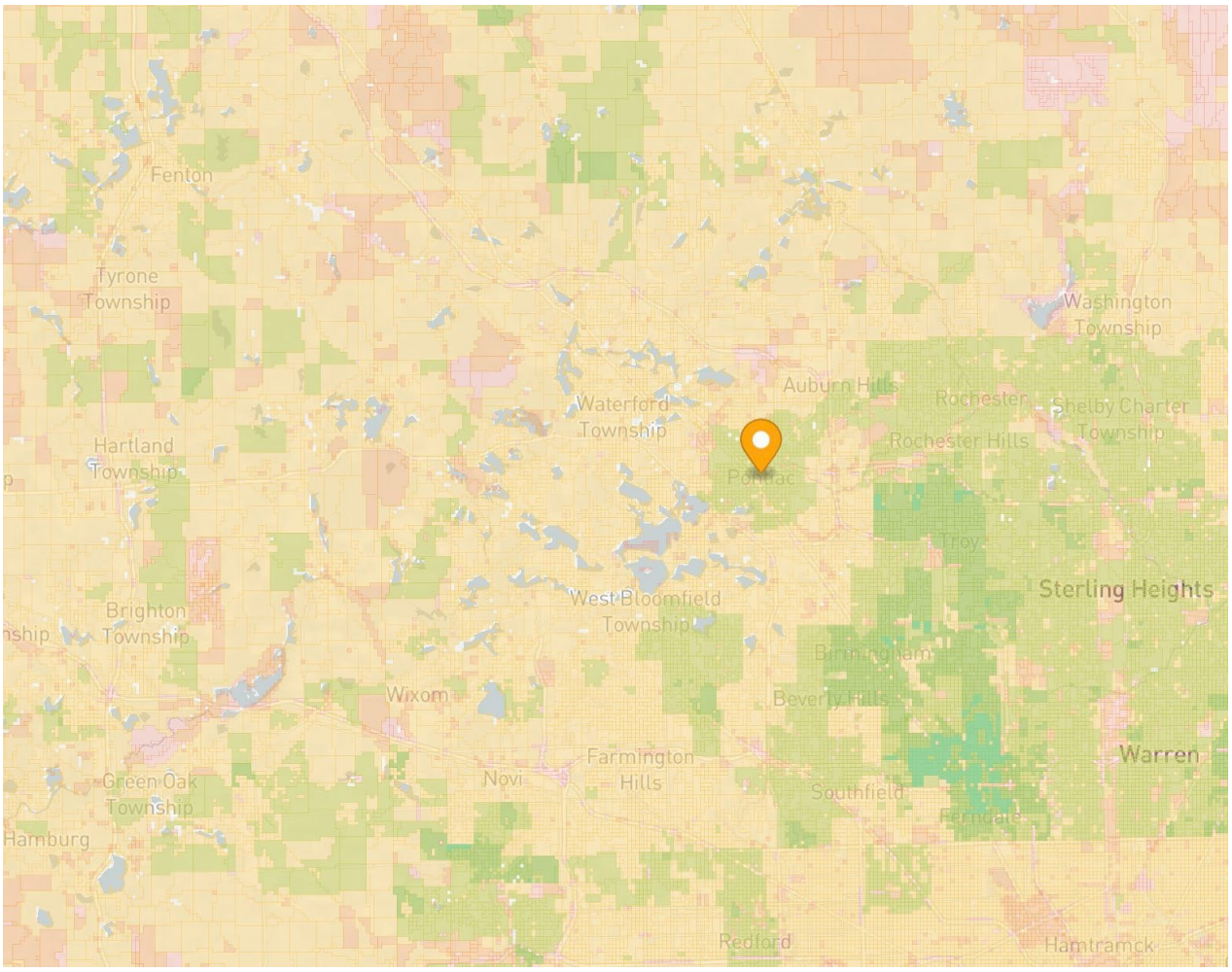
Source: https://broadbandnow.com/Michigan

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

Competition generated through having more than one broadband internet service provider serves to ensure that providers keep pricing and service quality competitive, which is especially important for low- and moderate-income residents. A lack of competition among providers may result in higher prices and unserved areas. Despite new initiatives through the Michigan Broadband Internet Office, the 2019-2023 American Community Survey reports that 6.3% of Oakland County residents do not have any type of internet service subscription at home. For very low-income residents earning $20,000 or less per year this number jumps to 21.5%. 10.2% of residents

earning $20,000-$75,000 per year have no internet access, while just 2.1% of residents earning over $75,000 per year are without internet access, highlighting the significance of affordability in internet access[14].

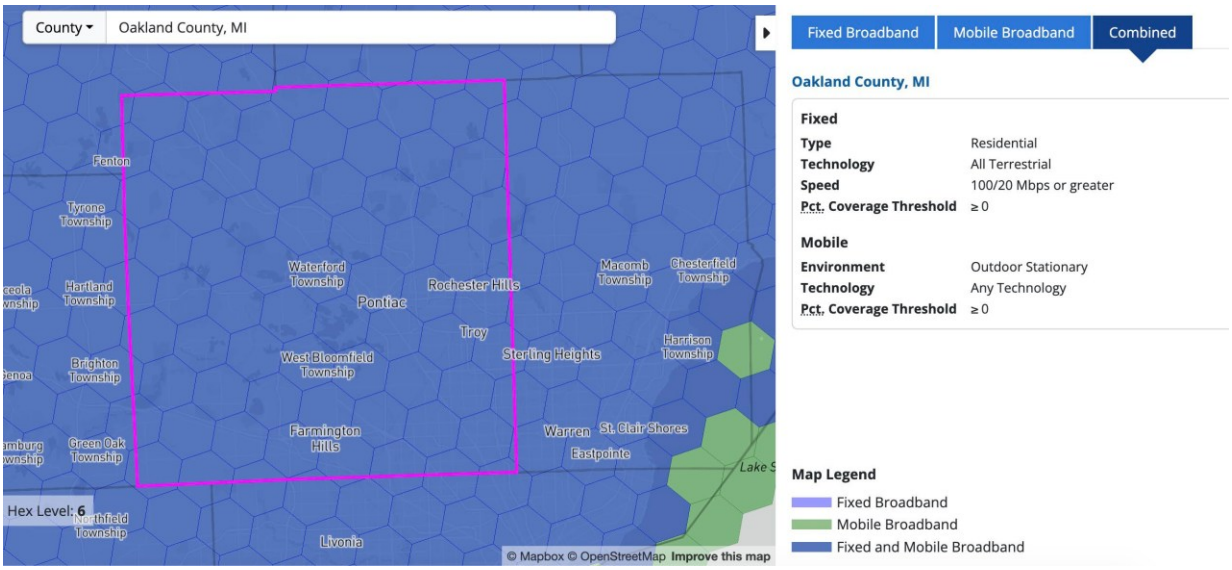
One source of data on broadband access comes from the website BroadbandNow, which exists to help people discover broadband options in every area. The map below depicts internet affordability in the area: green indicates lower minimum prices, while red indicates higher minimum prices. Number of providers follows a similar pattern, with areas with lower minimum prices reporting more providers and areas with higher minimum prices reporting fewer providers.



Source: https://broadbandnow.com/research/national-broadband-map

[14] 2019-2023 American Community Survey, table S2801

Another source of coverage data is the FCC's National Broadband Map, which shows that the entirety of Oakland County has access to both fixed and mobile broadband services:



Source: https://broadbandmap.fcc.gov/area-summary/combined?version=dec2024&geoid=26125&type=county&zoom=8.84&vlon=-83.386415&vlat=42.660334&fixed_br=r&fixed_speed=100_20&fixed_tech=1_2_3_6_7&fixed_pct_cvg=0&mobile_tech=tech_all&mobile_env=0&mobile_pct_cvg=0

Taken together, these two maps indicate that there is broadband service widely available throughout the County; however, data on low levels of internet access among low-income groups indicates that affordability of internet services is a major concern within the County. Initiatives such as increasing competition among providers, investigating opportunities for broadband offered as a City or County utility, or creating broadband assistance funds for low- to moderate-income residents may help to narrow the digital divide in Oakland County.

MA-65 HAZARD MITIGATION - 91.210(A)(5), 91.310(A)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

Oakland County's most recent Hazard Mitigation Plan was updated in 2023 and uses a rubric to calculate the risk of an event occurring by weighted factors including the probability of occurrence, the impact of occurrence, and the increased impact of climate change. The plan notes that according to University Corporation for Atmospheric Research (UCAR):

- Climate change is causing more extreme weather events, including severe drought
- Places prone to drought are expected to become even drier over the following century
- Higher temperatures, increasing variation in precipitation patterns, and changes in lake levels are likely to increase the vulnerability of cities in Oakland County to extreme events (including flooding, drought, heat waves, and more intense urban heat island effects), compounding already existing stressors

The plan also discusses the following climate change projections for Oakland County:

- Oakland County is expected to experience a 164% increase in extremely hot days within 25 years
- By 2048, Oakland County is expected to experience 7 more days that reach above 95°F (from 4 days to 11 days per year)
- Oakland County is projected to experience more rainfall per year but fewer rainy days per year over the course of the 21st century, meaning that more precipitation is anticipated per storm, increasing the risk of flooding

After analyzing these and other factors, the Hazard Mitigation Plan identified the following natural hazards as being of moderate to high risk in Oakland County:

- Flash flooding
- Winter storms or blizzards
- High or severe winds
- River flooding
- Tornadoes
- Ice or sleet storms

- Extreme cold
- Hail
- Lightning

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

In its September 2021 report "Climate Change and Social Vulnerability in the United States," the US EPA identifies low-income earners, minorities, elderly adults, and persons with less than a high school diploma as "socially vulnerable." Socially vulnerable persons are described as having a reduced capacity to "cope with and recover from climate change impacts," and socially vulnerable groups are described as more likely to live in poorer neighborhoods with lower elevations and poorly maintained infrastructure. The 2019-2023 ACS estimated that nearly 97,000 people in Oakland County are living below the poverty line. Additionally, mobile home residents, who are more likely to be low-income, are especially vulnerable to climate related hazards. The 2019-2023 ACS estimates that there are over 15,000 households living in mobile homes or other similar types of homes in Oakland County.

The 2023 Oakland County Hazard Mitigation Plan also notes 21 disadvantaged communities within the County as being at higher risk of climate hazards, describing the following:

According to the U.S. Council on Environmental Quality (ACEQ), a community is identified as "disadvantaged" if it is located in a census tract that is at or above the threshold for one or more environmental, climate, or other burdens, and at or above the threshold for associated socioeconomic burdens, including poverty and language barriers (U.S. Council on Environmental Quality, 2022). The total population of these 21 census tracts is 112,641 which is 22% of the total Oakland County population. Each census tract is further identified in Appendix F, illustrating specific socioeconomic burdens to each census tract. This information was used as part of the hazard risk ranking process and to determine potential inequities and disparities regarding potential impacts from natural hazards.

The plan also assesses specific vulnerabilities and concerns faced by these disadvantaged communities for each type of natural disaster.

OAKLAND COUNTY MICHIGAN
NEIGHBORHOOD & HOUSING DEVELOPMENT

2026-2030

Strategic Plan

SP-05 OVERVIEW

Strategic Plan Overview

The Strategic Plan will guide the allocation of Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grant (ESG) funding during the 2026-2030 planning period. Oakland County's goals for the 2026-2030 period focus on a number of high priority needs identified through data analysis, community member input, consultation with County staff and other public agencies, and review of recently completed plans and studies. Available resources will be targeted toward specific goals designed to address those priority needs. These goals include:

- Increase and improve affordable housing options
- Increase and improve homeless service, shelter, and prevention efforts
- Create and sustain a suitable living environment through infrastructure and public facility improvements
- Provide public services to expand economic opportunity, improve safety, enhance food access, and provide other assistance for low- and moderate-income households, seniors, people with disabilities, and other eligible groups
- Administration of funding and projects

The above-listed goals will be used to guide funding decisions for each program year and to prepare the Annual Action Plans. Each program year, the County will allocate funding to subrecipients through a competitive application process. Each year over the five-year planning timeframe, Oakland County anticipates receiving an estimated $3,767,803 in CDBG funds, $1,877,222.90 in HOME funds, and $328,280 in ESG funds. Actual funding levels will vary each year. While some funding investments will be made throughout the County, others will be geographically focused in specific target areas. The County will target these countywide, with emphasis on areas of low- and moderate-income census tracts.

SP-10 GEOGRAPHIC PRIORITIES – 91.215 (A)(1)

Geographic Area

Target Area	Percentage of Funds
Countywide	67%
HOME Consortium area	33%

TABLE 51 - GEOGRAPHIC PRIORITY AREAS

Area Name:	Oakland County
Area Type:	Urban County
Other Target Area Description:	N/A
HUD Approval Date:	N/A
% of Low/ Mod:	N/A
Revital Type:	N/A
Other Revital Description:	N/A
Identify the neighborhood boundaries for this target area.	All participating CDBG/ESG communities
Include specific housing and commercial characteristics of this target area.	N/A
How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	N/A
Identify the needs in this target area.	N/A

What are the opportunities for improvement in this target area?	N/A
Are there barriers to improvement in this target area?	N/A

Area Name:	**Oakland County HOME Consortium**
Area Type:	Consortium
Other Target Area Description:	N/A
HUD Approval Date:	N/A
% of Low/ Mod:	N/A
Revital Type:	N/A
Other Revital Description:	N/A
Identify the neighborhood boundaries for this target area.	All participating HOME communities
Include specific housing and commercial characteristics of this target area.	N/A
How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	N/A
Identify the needs in this target area.	N/A
What are the opportunities for improvement in this target area?	N/A
Are there barriers to improvement in this target area?	N/A

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

Oakland County does not allocate investments geographically and does not plan to identify any specific Neighborhood Revitalization Strategy Areas (NRSA). Activities selected will be eligible for funding based on their ability to meet Oakland County goals, which currently prioritize housing and other similarly transformative projects.

The following 52 (85%) of Oakland County communities participate in the County's "Urban County" CDBG housing and community development programs: Cities - Auburn Hills, Berkley, Birmingham, Bloomfield Hills, Clarkston, Clawson, Farmington, Ferndale, Hazel Park, Huntington Woods, Keego Harbor, Lathrup Village, Madison Heights, Northville, Novi, Oak Park, Orchard Lake Village, Pleasant Ridge, Rochester, Rochester Hills, South Lyon, Sylvan Lake, Troy, Walled Lake, Wixom Townships - Addison, Bloomfield, Brandon, Commerce, Groveland, Highland, Holly, Independence, Lyon, Milford, Oakland, Orion, Oxford, Rose, Royal Oak, Springfield, West Bloomfield, White Lake Villages - Beverly Hills, Franklin, Holly, Lake Orion, Leonard, Milford, Ortonville, Oxford and Wolverine Lake. Farmington Hills, Royal Oak, Southfield, Pontiac, and Waterford Township are HUD entitlement communities. These communities with over 50,000 residents are "entitled" to receive HUD funds and have chosen to administer their own CDBG programs. The City of Lake Angelus, Novi Township, Southfield Township and the Village of Bingham Farms do not receive HUD funds.

Oakland County’s Recapture and Reallocation Policy allows the County to take back CDBG funds from participating communities if they remain unobligated for two years, ensuring compliance with federal timeliness rules. The County then redistributes these recaptured dollars to communities or projects that can spend them quickly and effectively, helping maintain HUD’s required expenditure pace and directing resources to activities that benefit low- and moderate-income residents.

Oakland County HOME Consortium - Oakland County serves as the lead entity for the Oakland County HOME Consortium (OCHC), which is comprised of the Urban County of Oakland, Farmington Hills, Royal Oak, and Southfield. The HOME program funds HIP, Rental Development/Preservation gap financing and CHDO activities throughout Consortium communities.

SP-25 PRIORITY NEEDS - 91.215(A)(2)

Priority Needs

During the development of the Consolidated Plan, seven priority needs were identified. Each of the needs is described in the table that follows along with a basis for its priority designation and the populations to be served.

TABLE 52 – PRIORITY NEEDS SUMMARY

	Priority Need	Increase and Improve Affordable Housing Options
	Priority Level	High
	Population	Extremely low income Low income Moderate income Large family Families with children Elderly/frail elderly Public housing residents People with disabilities People experiencing homelessness
1	**Geographic Areas Affected**	Countywide
	Associated Goals	Increase and Improve Affordable Housing Options
	Description	Activities furthering access to and availability of affordable housing options including but not limited to: rental and homeowner rehabilitation efforts; increased marketing of available services and funding throughout the County, especially in northern and rural areas; aging in place initiatives; home ownership assistance and education; increased availability of programs and materials in non-English languages, especially Spanish; code enforcement efforts; and other relevant initiatives.
	Basis for Relative Priority	The primary housing need identified by residents, stakeholders, and service providers in Oakland County through the community participation process was a significant need for increased access to and inventory of affordable housing for all low- and moderate-income groups. Additional needs included emergency rehab and

		repair for both renters and owners and a significant need for better advertisement of available programs and services, especially in northern and/or rural parts of the County – residents in these areas reported a pressing need for programs such as emergency rehab and repair which already exist, indicating that there is a need for better marketing and collaboration with rural parts of the County.
2	**Priority Need**	**Increase Homeless Shelter, Service, and Prevention Efforts**
	Priority Level	High
	Population	Extremely low income Low income Moderate income Large family Families with children Elderly/frail elderly Public housing residents People with disabilities People experiencing homelessness
	Geographic Areas Affected	Countywide
	Associated Goals	Increase Homeless Shelter, Service, and Prevention Efforts
	Description	Activities furthering access to and availability of homeless shelter, service, and prevention efforts, including but not limited to: additional overnight and warming center beds; eviction prevention; expanded street outreach efforts; initiatives to narrow the digital divide among the homeless population, including expansion of the existing informational kiosk program; increased shelter and service options for survivors of domestic violence; increased shelter and service options in northern and/or rural areas of the County; and other relevant initiatives.
	Basis for Relative Priority	Service providers and residents who provided feedback during the community engagement process overwhelmingly reported that homelessness is a growing issue within Oakland County – an observation that is backed by data from the Alliance for Housing, which serves as the CoC for the County. In particular, service providers noted an urgent need for additional emergency night shelter and warming center space, with some reporting that they had experienced clients freezing to death due to a lack of access to beds or warming centers. Other urgent needs consistently reported

		included access to the internet and electronic devices, which is required to participate in case management and access resources and services; access to transportation; broad/non targeted street outreach efforts; and increased homelessness and eviction prevention efforts – service providers especially noted that in the 2010s and during COVID there was a significantly larger amount of prevention funding available, and that the loss of this funding has led to significant issues and an increase in homelessness.
3	**Priority Need**	**Create And Sustain a Suitable Living Environment through Infrastructure and Public Facility Improvements**
	Priority Level	High
	Population	Extremely low income Low income Moderate income Large family Families with children Elderly/frail elderly Public housing residents People with disabilities People experiencing homelessness
	Geographic Areas Affected	Countywide
	Associated Goals	Create and sustain a suitable living environment through infrastructure and public facility improvements
	Description	Activities furthering creating and sustaining a suitable living environment through infrastructure and public facility improvements, including but not limited to: park, playground, community center, and other recreation facility expansion, repair, and maintenance; street, sidewalk, street light, and drain expansion, repair, and maintenance; ADA accessibility improvements; infrastructure improvements in rural areas of the County; and other relevant initiatives.
	Basis for Relative Priority	Community members and stakeholders engaged in the community feedback process most often noted a need for improvements of parks and recreation facilities, roads, sidewalks, streetlights, and community centers. Additionally, a lack of infrastructure suitable to support development in rural areas of the County was noted as a barrier to expanding affordable housing access.

4	**Priority Need**	**Provide public services to expand economic opportunity, improve safety, enhance food access, and provide other assistance for low- and moderate-income households, seniors, people with disabilities, and other eligible groups**
	Priority Level	High
	Population	Extremely low income Low income Moderate income Large family Families with children Elderly/frail elderly Public housing residents People with disabilities People experiencing homelessness
	Geographic Areas Affected	Countywide
	Associated Goals	Provide public services to expand economic opportunity, improve safety, enhance food access, and provide other assistance for low- and moderate-income households, seniors, people with disabilities, and other eligible groups
	Description	Activities furthering public service availability and access, including but not limited to: increased service availability in northern and rural parts of the County; increased access to free or affordable transit services; increased access to free or affordable childcare services; increased access to programs and services available in Spanish; increased housing-related services including housing counseling, homebuyer education, and financial literacy; formation and/or advertisement of a centralized phone-based resource hub for residents who do not have access or the ability to use a computer; and other relevant initiatives.
	Basis for Relative Priority	Community members and stakeholders engaged in the community feedback process noted significant needs related to childcare and transit options, especially for low-income groups, noting that a lack of transit and/or childcare frequently prevents eligible residents from accessing existing resources. Other needs noted were programs and information available in Spanish, especially housing information and services; homebuyer education programs and services; and better organized information on how to access services in northern and rural parts of the County. Residents in these areas of the

		County reported people “making phone calls all day and still not knowing how to get help”; however, comprehensive resource guides are easy to find with a web search, indicating that this issue may most affect those who cannot or do not know how to access information via web.
5	**Priority Need**	**Administration of Funding and Projects**
	Priority Level	High
	Population	Extremely low income Low income Moderate income Large family Families with children Elderly/frail elderly Public housing residents People with disabilities People experiencing homelessness
	Geographic Areas Affected	Countywide
	Associated Goals	Administration of Funding and Projects
	Description	Costs and activities related to and/or supporting the administration of funding and projects, including marketing of available initiatives and services
	Basis for Relative Priority	Program administration costs associated with the coordination and delivery of services to Oakland County residents.

SP-30 INFLUENCE OF MARKET CONDITIONS – 91.215 (B)

Influence of Market Conditions

TABLE 53 – INFLUENCE OF MARKET CONDITIONS

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	High level of cost burdens among low-income households; waiting lists for assisted housing units; and need for short-term rental assistance for homeless individuals and families transitioning to permanent housing. Currently, TBRA is provided through HUD's Section 8 Housing Choice Voucher program administered through local housing authorities.
TBRA for Non-Homeless Special Needs	High level of cost burdens among low-income households, including non-homeless special needs populations; waiting lists for assisted housing units for seniors and people with disabilities.
New Unit Production	Age and condition of housing; waiting lists at existing assisted housing developments; high occupancy rates and rental rates; sales prices unaffordable to low/moderate income households.
Rehabilitation	Age and condition of housing; issues related to substandard housing, especially for low-income renters; need for home repairs for seniors and other homeowners, including lead-based paint remediation.
Acquisition, including preservation	Subsidized housing developments anticipated to age out of their affordability period; age, condition, and availability of multifamily properties suitable for acquisition/rehabilitation; vacant/hazardous buildings identified through code enforcement.

SP-35 ANTICIPATED RESOURCES - 91.215(A)(4), 91.220(C)(1,2)

Introduction

Oakland County is eligible to receive funding from three CPD formula grants (CDBG, HOME, and ESG). Combined, the County will receive an anticipated $5,973,305.90 in HUD grant funds for the 2026 program year. The table below outlines anticipated funding levels by program.

Anticipated Resources

TABLE 54 - ANTICIPATED RESOURCES

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan	Narrative Description
			Annual Allocation	Program Income	Prior Year Resources	Total		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	$3,767,803.00	$1,481,204.14	$0.00	$5,249,007.14	$19,471,212.00	Public facilities, neighborhood and housing improvements, multi-family rehab, and public services benefiting low-income persons throughout Oakland County Urban County participating communities.

HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership Tenant Based Rental Assistance (TBRA)	$1,877,222.90	$1,600,000.00	$0.00	$3,477,222.90	$13,908,891.60	Acquisition, rehabilitation, new construction of affordable housing including rental development and homebuyer assistance throughout Oakland County HOME Consortium participating communities.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid rehousing (rental assistance) Rental Assistance Services Transitional housing	$328,280.00	$0.00	$0.00	$328,280.00	$1,313,120.00	Emergency Shelter, Homeless Prevention and Rapid Re-Housing, HMIS and Administration throughout Oakland County Urban County participating communities.

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

CDBG - No Match Requirement

- In-kind County level administrative functions: human resources, marketing, fiscal services, purchasing, auditing, corporation counsel, record retention and mail room support services
- Infrastructure and public facility projects supported with funds from participating
- Revolving Loan Fund (RLF) generated from paybacks on CDBG funded housing rehabilitation loans supplement the HIP. During PY 2026 the County will recycle approximately $1,100,00 in CDBG RLF into the HIP for the rehabilitation of approximately 50 single-family homes of LI residents
- Program Income (PI) Estimate generated from Neighborhood Stabilization paybacks. During PY 2026 the County will recycle approximately $381,204.14 in CDBG PI into the eligible activities.
- Emergency, youth, senior and other public services designed to meet special needs of LI residents are expanded through leverage from various public service agencies.

HOME - 25% Match Requirement

- Oakland County ensures that all housing projects receive $1 of non-federal match for every $4 of HOME funds expended, in accordance with federal guideline (s.92.218)
- The HOME program requires a 25% match on all non-administrative activities. In PY 2026, $469,306 in general funds will serve as match for County level housing rehabilitation, rental development/preservation and homebuyer assistance activities
- CHDO's leverage HOME funds with state and private resources to develop affordable housing
- PI generated from paybacks on HOME funded housing rehabilitation loans supplement the HIP

ESG - 100% Match Requirement

- Oakland County passes on the match requirements to its vendors
- Cash contributions for allowable costs including staff salaries/fringe benefits

- Noncash contributions
- Volunteer services are matched at the current minimum wage salary unless the recipient can verify a higher rate of pay for current employees performing similar work
- Real property, equipment, goods or services that if the recipient had to pay for them with grant funds, the payments would have been indirect costs
- The value of donated goods and services such as clothing, food, diapers, haircuts, etc. - value placed should be consistent with Office of Management and Budget Circulars

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

Designated CHDOs may access publicly owned land or property for redevelopment as affordable housing through public or private entities. The County created the Oakland Together Housing Trust Fund (HTF) and a Land Bank Authority to invest in publicly owned and/or tax-foreclosed land. The HTF was initially funded with $18M of American Rescue Plan Act (ARPA) funding as well as an ongoing $2M annual appropriation of County resources. The HTF and NHD partners with affordable housing developers, non-profits, CHDOs, local municipalities to develop a wide range of housing including shelter space, permanent supportive housing, PBV/HCV supported housing, senior affordable housing, family affordable housing, workforce housing, adaptive reuse housing, and other types of housing. The housing investments of NHD and the HTF leverage federal and County funds with other financial sources such as LIHTC, State funding, local funding, property tax exemptions, brownfield tax increment financing, private loans, private equity, and other available resources.

Since 2023, over 1,550 units of mixed income housing have been created or preserved using NHD and HTF funding. These units are at various stages of development from completed, under construction, or awaiting financial close in the near term. NHD and the HTF's total investment of $37.1M includes $18M in ARPA funding, $5.6M in County general funds, and $13.5M in HOME/CDBG funding resulting in a leveraged investment of over $404M into affordable and workforce housing throughout the County.

Discussion

Oakland County recognizes that Congress is considering updates to the CDBG program that could expand the eligible use of funds for housing development, including potential authority for communities to dedicate a portion of their CDBG allocation to new housing construction. While these changes remain speculative and subject to congressional negotiation, the County acknowledges the possibility that future statutory or regulatory

revisions may shift CDBG toward a stronger housing-production focus. Should such changes be enacted, the County will adapt its CDBG program accordingly to ensure a maximum commitment of funds to address the housing affordability needs of low- and moderate-income residents.

SP-40 INSTITUTIONAL DELIVERY STRUCTURE – 91.215(K)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Agencies and organizations through which Oakland County will carry out its Consolidated Plan are shown in Table 55. In addition to those listed in the table, the County will rely on a variety of non-profit and private sector housing developers, including Community Housing Development Organizations (CHDOs), Low Income Housing Tax Credit developers, and others.

TABLE 55 - INSTITUTIONAL DELIVERY STRUCTURE

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Oakland County Neighborhood and Housing Development	Government	Affordable housing (ownership and rental) Public facilities Public services Homelessness Non-homeless special needs Neighborhood improvements Planning	Jurisdiction
Oakland County Housing Trust Fund	Government	Affordable housing (ownership and rental)	Jurisdiction
Oakland County Veteran's Services	Government	Homelessness Non-homeless special needs Public services	Jurisdiction
Alliance for Housing	CoC	Affordable housing (ownership and rental) Homelessness Planning	Jurisdiction

Plymouth Housing Commission	PHA	Affordable housing (rental) Public housing Planning	
South Lyon Housing Commission	PHA	Affordable housing (rental) Public housing Planning	Jurisdiction
Royal Oak Township Housing Commission	PHA	Affordable housing (rental) Public housing Planning	Jurisdiction
Ferndale Housing Commission	PHA	Affordable housing (rental) Public housing Planning	Jurisdiction
Southfield Housing Commission	PHA	Affordable housing (rental) Public housing Planning	Jurisdiction
Royal Oak Housing Commission	PHA	Affordable housing (rental) Public housing Planning	Jurisdiction
Madison Heights Housing Commission	PHA	Affordable housing (rental) Public housing Planning	Jurisdiction
Michigan State Housing Development Authority (MSHDA)	PHA	Affordable housing (rental) Public housing Planning	State
Participating CDBG Communities	Government	Public facilities Neighborhood	Jurisdiction

		improvements Planning	
HOME Consortium	Government	Public facilities Neighborhood improvements Planning	Jurisdiction

Assess of Strengths and Gaps in the Institutional Delivery System

Oakland County is a very large jurisdiction both in land mass and in number of participating jurisdictions, entities, and organizations. This variety within the institutional delivery system is a strength in that it provides a diverse offering of resources dispersed broadly throughout the County, each with their own ties to the community. However, this large number of participating organizations requires special consideration and effort in the area of collaboration and data-sharing to ensure that funding and efforts are most effectively directed to serve the jurisdiction as a whole without redundancies. Interviews with service providers during the community participation process indicated that Oakland County has made significant improvements in inter-agency collaboration in recent years, but that collaboration could still be improved. As long as the County remains committed to furthering collaboration and data-sharing between its institutional delivery partners, this diversity of providers will remain a strength and not a weakness.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

TABLE 56 - HOMELESS PREVENTION SERVICES SUMMARY

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	X
Mortgage Assistance	X		
Rental Assistance	X	X	X
Utilities Assistance	X	X	X
Street Outreach Services			

Law Enforcement	X	X	
Mobile Clinics	X	X	X
Other Street Outreach Services	X	X	X
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	
Education	X		
Employment and Employment Training	X	X	
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	
Transportation	X	X	
Other			
Other			

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

The Oakland County Continuum of Care, operated through the Alliance for Housing, unites 37 agencies and organizations in order provide housing and services to people experiencing homelessness, including but not limited to:

- A total of 249 year-round and 42 seasonal or voucher-based emergency housing beds for families with children, adults alone, and unaccompanied children
- A total of 78 transitional housing beds for families with children, adults alone, and unaccompanied children

- A total of 1,144 permanent supportive housing beds for families with children, adults alone, chronically homeless persons and families, and veterans
- Searchable databases providing connections to resources including education, employment, financial, food, goods, health, housing, legal, transportation, and warming or cooling centers
- A comprehensive resource guide to mainstream services which may be useful to individuals experiencing homelessness compiled by McLaren Physician Partners

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

As with the service delivery system as a whole, the large number of individual service providers united under the Alliance for Housing may comprise both a strength and a weakness, depending on the level of collaboration and data sharing between organizations. Service providers interviewed during the community engagement process indicated that collaboration has increased significantly in recent years and that the largest gaps lie in the following areas:

- A large insufficiency of emergency shelter beds
- Insufficient comprehensive transit options for low-income and homeless populations
- Insufficient consistent access to internet and electronic devices for people experiencing homelessness, which are required for participation in most homeless resource programs
- Insufficient street outreach targeted to those who are homeless but who are not experiencing mental or behavioral health concerns
- Insufficient affordable, accessible childcare options for low-income and homeless populations

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

Service providers in Oakland County will continue to actively increase collaboration and data sharing efforts in order to avoid redundancy in services and target limited funds in the most impactful ways. The Alliance for Housing will continue to organize service providers and serve as the lead agency and CoC for homelessness and related services within Oakland County while continually attempting to expand services provided. Finally, Oakland County is currently addressing a noted gap in internet and

device access for those experiencing homelessness by installing free resource access kiosks throughout the County.

SP-45 GOALS SUMMARY – 91.215(A)(4)

Goals Summary Information

TABLE 57 – GOALS SUMMARY

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase and Improve Affordable Housing Options	2026	2030	Housing Affordability and Condition	Countywide	Housing Affordability and Condition	CDBG: $13,410,363.05 HOME: $15,647,502.60	Rental units constructed: 570 housing units Rental units rehabilitated: 580 housing units Homeowner housing rehabilitated: 700 housing units Direct financial assistance to homebuyers: 50 households assisted Homeowner housing added: 35 housing units
2	Increase and Improve Homeless Shelter, Service, and Prevention Efforts	2026	2030	Homeless	Countywide	Homeless Needs	ESG: $1,641,400.00	Homeless person overnight shelter: 2,500 persons assisted Homelessness prevention: 500 persons assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Create and sustain a suitable living environment through infrastructure and public facility improvements	2026	2030	Non-Housing Community Development	Countywide	Infrastructure and Public Facility Improvements	CDBG: $4,316,015.00	Public facility or infrastructure activities other than low/moderate-income housing benefit: 150,000 persons assisted Public facility or infrastructure activities for low/moderate-income housing benefit: 10,000 households assisted Housing code enforcement/Foreclosed property care: 25,000 housing units Buildings demolished: 25 buildings

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Provide public services to expand economic opportunity, improve safety, enhance food access, and provide other assistance for low- and moderate-income households, seniors, people with disabilities, and other eligible groups	2026	2030	Non-Homeless Special Needs Non-Housing Community Development	Countywide	Public Services	CDBG: $3,653,352.25	Public service activities other than low/moderate-income housing benefit: 3,500 persons assisted Public service activities for low/moderate-income housing benefit: 250 households assisted
5	Administration of funding and projects	2026	2030	Non-Homeless Special Needs Non-Housing Community Development Affordable Housing Homeless	Countywide	Program Administration	CDBG: $4,867,803.00 HOME: $1,738,611.45	N/A

Goal Descriptions

Goal Name	Goal Description
Increase and Improve Affordable Housing Options	Activities furthering access to and availability of affordable housing options including but not limited to: new housing production, multifamily rental acquisition and rehabilitation efforts; homeowner rehabilitation efforts; tenant-based rental assistance, increased marketing of available services and funding throughout the County, especially in northern and rural areas; aging in place initiatives; home ownership assistance and education; increased availability of programs and materials in non-English languages, especially Spanish; code enforcement efforts; and other relevant initiatives.
Increase and Improve Homeless Shelter, Service, and Prevention Efforts	Activities furthering access to and availability of homeless shelter, service, and prevention efforts, including but not limited to: additional overnight and warming center beds; eviction prevention; expanded street outreach efforts; initiatives to narrow the digital divide among the homeless population, including expansion of the existing informational kiosk program; increased shelter and service options for survivors of domestic violence; increased shelter and service options in northern and/or rural areas of the County; and other relevant initiatives.
Create and sustain a suitable living environment through infrastructure and public facility improvements	Activities furthering creating and sustaining a suitable living environment through infrastructure and public facility improvements, including but not limited to: park, playground, community center, and other recreation facility expansion, repair, and maintenance; street, sidewalk, street light, and drain expansion, repair, and maintenance; ADA accessibility improvements; infrastructure improvements in rural areas of the County; and other relevant initiatives.
Provide public services to expand economic opportunity, improve safety, enhance food access, and provide other assistance for low- and moderate-income households, seniors, people with disabilities, and other eligible groups	Activities furthering public service availability and access, including but not limited to: increased service availability in northern and rural parts of the County; increased access to free or affordable transit services; increased access to free or affordable childcare services; increased access to programs and services available in Spanish; increased housing-related services including housing counseling, homebuyer education, and financial literacy; formation and/or advertisement of a centralized phone-based resource hub for residents who do not have access or the ability to use a computer; and other relevant initiatives.
Administration of funding and projects	Program administration costs associated with the coordination and delivery of services to Oakland County residents, including but not limited to staff salary, planning, and administrative service delivery costs for implementing the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) and Emergency Solutions Grant (ESG) programs.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

Oakland County invested $1.4M in HOME entitlement and Match funding into John Grace Arms, a 60-unit senior affordable rental community. This development contains 7 HOME-funding units as part of the total 60 units (all low-income).

Oakland County also plans to fund the substantial renovation of Ferndale Park Co-op, a 200-unit senior rental community which will include 10 HOME-funded units. All 200 units are restricted for low-income seniors. One for-sale unit developed by Venture, Inc, a Oakland County CHDO will also be sold to a household earning less than 80% of the area median income.

As a part of the County administered Home Improvement Program 50 Single Unit Owner Occupied Rehab projects will be funded using HOME Funds for the upcoming program year .

SP-50 PUBLIC HOUSING ACCESSIBILITY AND INVOLVEMENT – 91.215(C)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

N/A, the jurisdiction is not under a Section 504 Voluntary Compliance Agreement.

Activities to Increase Resident Involvements

Resources for residents of publicly supported housing are accessible through the Community Housing Network's comprehensive Housing Resource Center. Residents of Oakland County can call the HRC to be paired with a trained housing specialist who will connect them with programs, resources, and housing opportunities based on caller eligibility, location, and circumstances. The Housing Resource Center is the designated HARA (Housing Assessment and Resource Agency) for Oakland County through the Continuum of Care and MSHDA (the Michigan State Housing Development Authority) and provides a comprehensive one-stop resource center for resources available through various PHAs and service providers throughout the County.

Is the public housing agency designated as troubled under 24 CFR part 902?

Oakland County Neighborhood & Housing Development Division does not administer a public housing commission; a total of 7 local housing commissions and the Michigan State Housing Development Authority provide publicly supported housing and resources within the County. None of these agencies are designated as troubled.

Plan to remove the 'troubled' designation

N/A

SP-55 BARRIERS TO AFFORDABLE HOUSING – 91.215(H)

Barriers to Affordable Housing

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Oakland County's 2020 Analysis of Impediments to Fair Housing Choice (AI) identifies several challenges related to housing affordability and access as county's barriers to fair housing choice. The AI also includes a review of the county's existing zoning code and identifies policies that may limit the development of affordable housing in the region.

Housing problems and limited access to homeownership disproportionately impact protected classes

Analysis of 2008-2017 homeownership data from the Housing Mortgage Disclosure Act (HMDA) showed that the mortgage denial rate in Oakland County is disproportionately among Black and African American households, who had an average denial rate of 29%. This denial rate was significantly higher than the county's overall average of 15%. Comparatively, White households had the county's lowest average denial rate at 13%.

Additionally, Comprehensive Housing Affordability Strategy (CHAS) data analysis on housing needs performed in this Consolidated Plan revealed that Black households exhibited disproportionately high rates of housing problems compared to the county as a whole.

Disparate patterns in lending, moderate to high levels of segregation, insufficient affordable housing in a range of unit sizes, racial minority households with disproportionate rates of housing problems, insufficient accessible affordable housing, and discrimination on the basis of disability were all identified as high priority contributing factors that impacted fair housing choice in the county's latest AI.

Zoning, Affordability, and Housing Choice

Although zoning ordinances and land use codes play an important role in regulating the health and safety of the built environment, overly restrictive codes can negatively impact housing affordability and fair housing choice within a jurisdiction. A Land Use Planner Survey of jurisdictions' zoning codes and land use regulations was conducted to identify any barriers that might impede access to housing. This survey found that most jurisdictions define the word "family" as related by blood, marriage, or adoption or "related" in any other traditional sense, which may limit access to housing choice. In

addition, few jurisdictions actively encourage affordable housing development or inclusionary policies.

Barriers to housing access in the private market

In addition to these public-sector barriers, the private market can also create barriers. Some landlords may refuse to rent units to households receiving other forms of housing assistance. This practice, known as source of income discrimination, reduces the affordability of existing units in the private housing stock and creates barriers to obtaining affordable housing. While source of income discrimination is illegal in the state of Michigan, many residents still struggle to find landlords willing to accept Section 8 or Housing Choice Vouchers for reasons ranging from stigma and discrimination to landlord concern about the potential for added cost. Housing Choice Vouchers make up a significant portion of publicly supported housing within Oakland County and are a key element in providing affordable housing to the county's most vulnerable populations. Because of this, landlord reluctance presents a significant barrier to affordable housing.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Oakland County has implemented several strategies to increase access to affordable housing in the region through countywide programs and partnerships with area nonprofits and service organizations. These actions include the County's establishment of the Housing Trust Fund (HTF) in 2023, which supports the development and preservation of affordable, attainable, workforce, and mixed-income housing throughout the county. Eligible applicants for HTF funds include developers, Community Housing Development Organizations (CHDOs), government entities, local housing commissions/authorities, and other housing-related development/preservation entities. The HTF and NHD have been instrumental in funding financial gaps for many affordable housing developments since its inception, which includes the preservation or creation of 1,550 mixed income units throughout the County.

The Unlocking Doors Oakland County Program also helps remove barriers to housing for homeless individuals receiving voucher assistance. This program incentivizes landlords to rent their home or apartment to a homeless individual with a housing voucher by providing up to $3,000 in assistance for minor unit repairs if they participate.

SP-60 HOMELESSNESS STRATEGY – 91.215(D)

Describe how the jurisdiction's strategic plan goals contribute to:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Homeless service providers interviewed during the community engagement process noted a need to expand street outreach efforts to include non-targeted/broad community outreach to homeless persons, noting that existing outreach efforts were limited to those with mental or behavioral health concerns. Expansion of street outreach efforts is included in Goal #2 as outlined in SP-45.

Addressing the emergency and transitional housing needs of homeless persons

Homeless service providers in Oakland County noted that the most urgent homelessness related need in the County is expansion of emergency shelter and warming center options, with service providers reporting that they had experienced clients freezing to death due to a lack of shelter or warming center bed space. Because of the life or death nature of this need, expansion of emergency shelter and warming center options should be the primary focus of homelessness related initiatives in Oakland County until such time as the County has adequate bed space to protect the life and health of the homeless population. Expansion of bed space is included in Goal #2 as outlined in SP-45.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

Homeless service providers interviewed reported several needs related to transitions out of homelessness and avoiding a return to homeless. The most pressing of these needs was consistent and long-term access to internet and electronic devices for people experiencing homelessness, with many providers noting that a lack of consistent access to these resources was a significant barrier to clients being able to receive services or remain in long-term programs. Many providers noted clients losing touch

with case management or being unable to contact a client who had received housing because the client had lost access to internet and/or a functioning device. Other needs noted as relevant to transitioning out of and remaining out of homelessness were access to free or low-cost transportation and childcare, with a lack of these services being adversely related to a return to homelessness. Expansion of these services and resources are included in Goal #2 as outlined in SP-45.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

Homelessness and eviction prevention initiatives were reported as a key need by homeless service providers within the County, with several noting that there was significantly more funding available for such programs in the 2010s and during COVID and that the loss of this funding has had significant adverse impacts on homelessness within Oakland County. Expansion and funding of such services are included in Goal #2 as outlined in SP-45.

SP-65 LEAD BASED PAINT HAZARDS – 91.215(I)

Actions to address LBP hazards and increase access to housing without LBP hazards

Oakland County follows HUD's Lead Safe Housing Rule requirements for any federally funded affordable housing development activities. The rule includes requirements for disclosure of lead-based paint hazards, risk assessment, evaluation, hazard reduction, interim controls, maintenance, and rehabilitation of properties.

As of April 30, 2025, the State of Michigan requires blood lead testing for young children. If a client receives a test result with a lead level of 3.5 micrograms per deciliter (µg/dL) or greater, they qualify for lead case management services through Oakland County's Health Division. The County also offers lead screenings at various locations and times throughout the month. These services are offered as part of the County's Childhood Lead Poisoning Prevention Program.

How are the actions listed above related to the extent of lead poisoning and hazards?

Following the Lead Safe Housing Rule requirements in federally funded housing activities reduces risk of lead poisoning and hazards. The Lead Safe Housing Rule is designed to reduce hazards relating to lead-based paint in housing, which include irreversible health effects, brain and nervous system damage, reduced intelligence, and learning disabilities. Children, pregnant women, and workers are most at risk of experiencing negative health effects resulting from exposure to lead-based paint hazards. More than 20 million homes in the United States built before 1978 contain lead-based paint hazards. For these reasons, it is vital that Oakland County reduce lead-based paint hazards in all federally funded housing activities, as over half (55%) of its housing stock was built prior to 1980. Additionally, county-level data from Michigan Department of Health and Human Services (MDHHS) indicates that in 2024, 2.7% of children under 6 years old in Oakland County reported elevated blood lead levels.

How are the actions listed above integrated into housing policies and procedures?

Oakland County has integrated Lead Safe Housing Rule requirements into housing policies and procedures by following HUD's Lead Safe Housing Rule requirements in all of the County's federally funded affordable housing development activities.

SP-70 ANTI-POVERTY STRATEGY – 91.215(J)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

An estimated 7.7% of Oakland County residents were living below the poverty level in the past 12 months, according to American Community Survey 5-Year Estimates for 2019-2023. The county's poverty rate is below the statewide poverty rate of 13.1% The county has a multifaceted approach to reducing the number of households living in poverty, including workforce development initiatives, strategies to increase access to affordable housing, and social services. The county's workforce development initiatives are detailed in the MA-45 section of this plan, and its strategies to remove barriers to housing are outlined in section SP-55.

Supportive services such as homeless prevention/assistance, emergency rental/utility assistance, food assistance, education, and health resources are offered by a variety of area nonprofits and organizations, including Oakland Livingston Human Service Agency (OLHSA), Community Housing Network (CHN), Lighthouse, and HOPE Shelters, among others. These organizations are guided by the goal of reducing the number of Oakland County households living in poverty through direct assistance via financial aid, food pantries, clothing distribution,

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

The housing affordability, workforce development, and homelessness programs detailed in this plan aim to support the achievement of housing and economic development goals for the county and region. The County will continue to fund public services, facilities, and infrastructure that address the region's most pressing homelessness, economic development, and workforce needs.

Many of the anti-poverty programs listed above are managed by organizations that participated in the development of this plan through focus groups, community meetings, and stakeholder interviews. Maintaining strong partnerships with these stakeholders through the duration of this plan will help the County more effectively coordinate programs and policies in a way that meets these anti-poverty goals.

SP-80 MONITORING – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

As described in 2 CFR 200.331 and 24 CFR 85.40, Oakland County is responsible for monitoring its participating communities/agencies to ensure compliance with all applicable Federal requirements. This includes individual project goals and requirements for the CDBG, HOME and ESG programs. The NHD monitoring approach is an ongoing process involving continuous communication and evaluation with the end goal of improving or reinforcing program participant performance.

NHD uses several informal and formal techniques to review community/agency program effectiveness, management efficiency, compliance and spending performance. Monitoring tools include frequent telephone/email contacts, written communications, interviews, periodic meetings, analysis of project documents, reports and audits, desk evaluations, risk assessments, on-site monitoring and spending performance tracking implemented in the HUD IDIS PR 59 - CDBG Activities at Risk Dashboard. Staff routinely tracks and evaluates ongoing capacity of communities/agencies to meet CDBG, HOME and ESG financial, production and overall management requirements and provides technical assistance to improve performance.

Monitoring Schedule - Oakland County determines its monitoring schedule based upon HUD requirements. The Division uses a Risk Analysis to determine which CDBG participating communities/agencies receive an onsite monitoring visit. Oakland County monitors all HOME and ESG recipients through onsite monitoring visits each year or at least once during a given contract period. As situations dictate, the Division provides additional onsite monitoring and/or technical assistance. Regardless of the frequency, the purpose and intent of any site visit or technical assistance initiative is to identify potential areas of risk or non-compliance and assist the community/agency in making necessary programmatic changes. By identifying and correcting compliance issues, the likelihood of efficient and effective service delivery to beneficiaries' increases and ensures continued program success.

Individual Monitoring Strategy – NHD devises an individual monitoring strategy for each community/agency to define the scope and focus of monitoring efforts conducted remotely or onsite. NHD operates a reimbursement financial system that requires communities to provide supporting documentation for approval prior to payment. This

policy maximizes community/agency compliance with Federal regulations on an ongoing basis. The Division reviews several areas during monitoring visits including:

- Minority and Women-Owned Business Compliance
- Section 504/Handicap Accessibility Requirements
- Comprehensive planning requirements

A copy of the Division Monitoring Policy is on file at the Division Office.

OAKLAND COUNTY MICHIGAN
NEIGHBORHOOD & HOUSING DEVELOPMENT

2026-2030

2026 Annual Action Plan

AP-15 EXPECTED RESOURCES – 91.220(C)(1,2)

Introduction

Oakland County is eligible to receive funding from three CPD formula grants (CDBG, HOME, and ESG). Combined, the County will receive an anticipated $5,973,305.90 in HUD grant funds for the 2026 program year. The table below outlines anticipated funding levels by program.

Anticipated Resources

TABLE 58 - EXPECTED RESOURCES – PRIORITY TABLE

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan	Narrative Description
			Annual Allocation	Program Income	Prior Year Resources	Total		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	$3,767,803.00	$1,481,204.14	$0.00	$5,249,007.14	$19,471,212.00	Public facilities, neighborhood and housing improvements, multi-family rehab, and public services benefiting low-income persons throughout Oakland County Urban County participating communities.

HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership Tenant Based Rental Assistance (TBRA)	$1,877,222.90	$1,600,000.00	$0.00	$3,477,222.90	$13,908,891.60	Acquisition, rehabilitation, new construction of affordable housing including rental development and homebuyer assistance throughout Oakland County HOME Consortium participating communities.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid rehousing (rental assistance) Rental Assistance Services Transitional housing	$328,280.00	$0.00	$0.00	$328,280.00	$1,313,120.00	Emergency Shelter, Homeless Prevention and Rapid Re-Housing, HMIS and Administration throughout Oakland County Urban County participating communities.

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

CDBG - No Match Requirement

- In-kind County level administrative functions: human resources, marketing, fiscal services, purchasing, auditing, corporation counsel, record retention and mail room support services
- Infrastructure and public facility projects supported with funds from participating
- Revolving Loan Fund (RLF) generated from paybacks on CDBG funded housing rehabilitation loans supplement the HIP. During PY 2026 the County will recycle approximately $1,100,00 in CDBG RLF into the HIP for the rehabilitation of approximately 50 single-family homes of LI residents
- Program Income (PI) Estimate generated from Neighborhood Stabilization paybacks. During PY 2026 the County will recycle approximately $381,204.14 in CDBG PI into the eligible activities.
- Emergency, youth, senior and other public services designed to meet special needs of LI residents are expanded through leverage from various public service agencies.

HOME - 25% Match Requirement

- Oakland County ensures that all housing projects receive $1 of non-federal match for every $4 of HOME funds expended, in accordance with federal guideline (s.92.218)
- The HOME program requires a 25% match on all non-administrative activities. In PY 2026, $469,306 in general funds will serve as match for County level housing rehabilitation, rental development/preservation and homebuyer assistance activities
- CHDO's leverage HOME funds with state and private resources to develop affordable housing
- PI generated from paybacks on HOME funded housing rehabilitation loans supplement the HIP

ESG - 100% Match Requirement

- Oakland County passes on the match requirements to its vendors
- Cash contributions for allowable costs including staff salaries/fringe benefits

- Noncash contributions
- Volunteer services are matched at the current minimum wage salary unless the recipient can verify a higher rate of pay for current employees performing similar work
- Real property, equipment, goods or services that if the recipient had to pay for them with grant funds, the payments would have been indirect costs
- The value of donated goods and services such as clothing, food, diapers, haircuts, etc. - value placed should be consistent with Office of Management and Budget Circulars

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

Designated CHDOs may access publicly owned land or property for redevelopment as affordable housing through public or private entities. The County created the Oakland Together Housing Trust Fund (HTF) and a Land Bank Authority to invest in publicly owned and/or tax-foreclosed land. The HTF was initially funded with $18M of American Rescue Plan Act (ARPA) funding as well as an ongoing $2M annual appropriation of County resources. The HTF and NHD partners with affordable housing developers, non-profits, CHDOs, local municipalities to develop a wide range of housing including shelter space, permanent supportive housing, PBV/HCV supported housing, senior affordable housing, family affordable housing, workforce housing, adaptive reuse housing, and other types of housing. The housing investments of NHD and the HTF leverage federal and County funds with other financial sources such as LIHTC, State funding, local funding, property tax exemptions, brownfield tax increment financing, private loans, private equity, and other available resources.

Since 2023, over 1,550 units of mixed income housing have been created or preserved using NHD and HTF funding. These units are at various stages of development from completed, under construction, or awaiting financial close in the near term. NHD and the HTF's total investment of $37.1M includes $18M in ARPA funding, $5.6M in County general funds, and $13.5M in HOME/CDBG funding resulting in a leveraged investment of over $404M into affordable and workforce housing throughout the County.

Discussion

Oakland County recognizes that Congress is considering updates to the CDBG program that could expand the eligible use of funds for housing development, including potential authority for communities to dedicate a portion of their CDBG allocation to new housing construction. While these changes remain speculative and subject to congressional negotiation, the County acknowledges the possibility that future statutory or regulatory

revisions may shift CDBG toward a stronger housing-production focus. Should such changes be enacted, the County will adapt its CDBG program accordingly to ensure a maximum commitment of funds to address the housing affordability needs of low- and moderate-income residents.

OAKLAND COUNTY MICHIGAN
NEIGHBORHOOD & HOUSING DEVELOPMENT

2026-2030

Annual Goals and Objectives

AP-20 ANNUAL GOALS AND OBJECTIVES

Goals Summary Information

TABLE 59 - GOALS SUMMARY

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase and Improve Affordable Housing Options	2026	2027	Housing Affordability and Condition	Countywide	Housing Affordability and Condition	CDBG: $2,622,841.09 HOME: $3,129,500.61	Rental units constructed: 114 housing units Rental units rehabilitated: 116 housing units Homeowner housing rehabilitated: 140 housing units Direct financial assistance to homebuyers: 10 households assisted Homeowner housing added: 7 housing units
2	Increase and Improve Homeless Shelter, Service, and Prevention Efforts	2026	2027	Homeless	Countywide	Homeless Needs	ESG: $328,280	Homeless person overnight shelter: 500 persons assisted Homelessness prevention: 100 persons assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Create and sustain a suitable living environment through infrastructure and public facility improvements	2026	2027	Non-Housing Community Development	Countywide	Infrastructure and Public Facility Improvements	CDBG: $922,435	Public facility or infrastructure activities other than low/moderate-income housing benefit: 30,000 persons assisted Public facility or infrastructure activities for low/moderate-income housing benefit: 2,000 households assisted Housing code enforcement/Foreclosed property care: 5,000 housing units Buildings demolished: 5 buildings

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Provide public services to expand economic opportunity, improve safety, enhance food access, and provide other assistance for low- and moderate-income households, seniors, people with disabilities, and other eligible groups	2026	2027	Non-Homeless Special Needs Non-Housing Community Development	Countywide	Public Services	CDBG: $730,170.45	Public service activities other than low/moderate-income housing benefit: 700 persons assisted Public service activities for low/moderate-income housing benefit: 50 households assisted
5	Administration of funding and projects	2026	2027	Non-Homeless Special Needs Non-Housing Community Development Affordable Housing Homeless	Countywide	Program Administration	CDBG: $973,560.60 HOME: $347,722.29	N/A

Goal Descriptions

Goal Name	Goal Description
Increase and Improve Affordable Housing Options	Activities furthering access to and availability of affordable housing options including but not limited to: new housing production, multifamily rental acquisition and rehabilitation efforts; homeowner rehabilitation efforts; tenant-based rental assistance, increased marketing of available services and funding throughout the County, especially in northern and rural areas; aging in place initiatives; home ownership assistance and education; increased availability of programs and materials in non-English languages, especially Spanish; code enforcement efforts; and other relevant initiatives.
Increase and Improve Homeless Shelter, Service, and Prevention Efforts	Activities furthering access to and availability of homeless shelter, service, and prevention efforts, including but not limited to: additional overnight and warming center beds; eviction prevention; expanded street outreach efforts; initiatives to narrow the digital divide among the homeless population, including expansion of the existing informational kiosk program; increased shelter and service options for survivors of domestic violence; increased shelter and service options in northern and/or rural areas of the County; and other relevant initiatives.
Create and sustain a suitable living environment through infrastructure and public facility improvements	Activities furthering creating and sustaining a suitable living environment through infrastructure and public facility improvements, including but not limited to: park, playground, community center, and other recreation facility expansion, repair, and maintenance; street, sidewalk, street light, and drain expansion, repair, and maintenance; ADA accessibility improvements; infrastructure improvements in rural areas of the County; and other relevant initiatives.
Provide public services to expand economic opportunity, improve safety, enhance food access, and provide other assistance for low- and moderate-income households, seniors, people with disabilities, and other eligible groups	Activities furthering public service availability and access, including but not limited to: increased service availability in northern and rural parts of the County; increased access to free or affordable transit services; increased access to free or affordable childcare services; increased access to programs and services available in Spanish; increased housing-related services including housing counseling, homebuyer education, and financial literacy; formation and/or advertisement of a centralized phone-based resource hub for residents who do not have access or the ability to use a computer; and other relevant initiatives.
Administration of funding and projects	Program administration costs associated with the coordination and delivery of services to Oakland County residents, including but not limited to staff salary, planning, and administrative service delivery costs for implementing the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) and Emergency Solutions Grant (ESG) programs.

PROJECTS: AP-35 PROJECTS – 91.220(D)

Introduction

Listed below are the projects which Oakland County intends to implement and fund in FY 2026.

Projects

TABLE 60 – PROJECT INFORMATION

#	Project Name
1	CDBG Administration
2	CDBG Housing Rehabilitation/Revolving Loan Fund Estimate
3	CDBG Housing/HIP Direct Project Costs
4	CDBG Public Services Housing Counseling
5	CDBG PS/Battered & Abused
6	CDBG Mobile Home Minor Home Repair
7	CDBG Code Enforcement
8	CDBG Minor Home Repair
9	CDBG Public Facilities and Infrastructure
10	CDBG Homebuyer Assistance (13B)
11	CDBG Homebuyer Assistance (05R)
12	CDBG Shelter/Homeless Operations
13	CDBG Homeless Facilities
14	CDBG Public Services (Minus Battered & Abused)
15	HOME Administration/Program Income Estimate
16	HOME Housing Rehabilitation

#	Project Name
17	HOME CHDO Rental
18	HOME CHDO Operating Expenses
19	HOME CHDO Homebuyer
20	HOME Rental
21	ESG Administration and ESG Homelessness
22	CDBG Rental Acquisition and Renovation
23	CDBG Clearance and Demolition

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

Quantitative research (housing market and demographic analysis) and qualitative research (surveys, public meetings, focus groups, and resident input) impacted the priority needs and strategies for the Oakland County PY 2026-2030 Consolidated Plan.

Oakland County does not allocate investments geographically and does not plan to identify any specific Neighborhood Revitalization Strategy Areas (NRSA). Activities selected will be eligible for funding based on their ability to meet Oakland County goals, which currently prioritize housing and other similarly transformative projects.

The primary obstacle to addressing underserved needs is the lack of adequate financial resources. Oakland County will continue to pursue funding from a variety of sources in order to overcome this barrier

AP-38 PROJECT SUMMARY

Project Summary Information

1	**Project Name**	CDBG Administration
	Target Area	Oakland County
	Goals Supported	Administration and Funding of Projects
	Needs Addressed	Administration and Funding of Projects
	Funding	$973,560.60
	Description	Administration of the CDBG program including management, public information and fair housing activities.
	Target Date	06/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Oakland County Neighborhood & Housing Development Division 1200 N. Telegraph Rd. Bldg. 34E, Pontiac, MI 48341
	Planned Activities	General program administration.

2		
	Project Name	CDBG Housing Rehabilitation/Revolving Loan Fund Estimate
	Target Area	Oakland County HOME Consortium Oakland County
	Goals Supported	Increase and Improve Affordable Housing Options
	Needs Addressed	Increase and Improve Affordable Housing Options
	Funding	$883,500.00
	Description	Contract work and estimated loan payments of the County's Home Improvement Program which is available to income-qualified homeowners in participating communities.
	Target Date	06/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	80 Households
	Location Description	Specific and variable
	Planned Activities	Contract work and estimated loan payments of the County's Home Improvement Program which is available to income-qualified homeowners in participating communities.

3		
	Project Name	CDBG Housing/HIP Direct Project Costs
	Target Area	Oakland County HOME Consortium Oakland County
	Goals Supported	Increase and Improve Affordable Housing Options
	Needs Addressed	Increase and Improve Affordable Housing Options
	Funding	$684,701.47
	Description	Direct project costs of contract work of the County's Home Improvement Program which is available to income qualified homeowners of single-family owner-occupied units and owner occupants of attached single family rental (2-4 units) in participating communities.
	Target Date	06/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	80 Households
	Location Description	Specific and variable
	Planned Activities	Housing rehabilitation – direct project costs.

4		
	Project Name	CDBG Public Services – Housing Counseling
	Target Area	Oakland County HOME Consortium Oakland County
	Goals Supported	Provide public services to expand economic opportunity, improve safety, enhance food access, and provide other assistance for low- and moderate-income households, seniors, people with disabilities, and other eligible groups.
	Needs Addressed	Provide public services to expand economic opportunity, improve safety, enhance food access, and provide other assistance for low- and moderate-income households, seniors, people with disabilities, and other eligible groups.
	Funding	$319,546.00
	Description	Comprehensive housing counseling services to help address housing matters including foreclosure, homebuyer and tenant issues.
	Target Date	06/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Oakland County Neighborhood & Housing Development Division 1200 N. Telegraph Rd. Bldg. 34E, Pontiac, MI 48341
	Location Description	Specific and variable

	Planned Activities	Housing counseling services.

5	**Project Name**	CDBG Public Services – Battered & Abused
	Target Area	Oakland County HOME Consortium Oakland County
	Goals Supported	Provide public services to expand economic opportunity, improve safety, enhance food access, and provide other assistance for low- and moderate-income households, seniors, people with disabilities, and other eligible groups.
	Needs Addressed	Provide public services to expand economic opportunity, improve safety, enhance food access, and provide other assistance for low- and moderate-income households, seniors, people with disabilities, and other eligible groups.
	Funding	$64,500.45
	Description	Services for victims of domestic violence, dating violence, sexual assault or stalking as part of a County executed and administered contract with HAVEN.
	Target Date	06/30/2027

	Estimate the number and type of families that will benefit from the proposed activities	330 Individuals
	Location Description	HAVEN 801 Vanguard Drive, Pontiac, MI 48341
	Planned Activities	Housing counseling services.

6	**Project Name**	CDBG Mobile Home Minor Home Repair
	Target Area	Oakland County
	Goals Supported	Increase and Improve Affordable Housing Options
	Needs Addressed	Increase and Improve Affordable Housing Options
	Funding	$161,730.00
	Description	Minor home repair for the mobile homes of income qualified households as part of a County executed and administered contract with a third-party non-profit. Repairs will conform to Oakland County guidelines and State of Michigan Lead Based Paint requirements.
	Target Date	06/30/2027

	Estimate the number and type of families that will benefit from the proposed activities	11 low-mod families
	Location Description	Specific and variable
	Planned Activities	Minor repair to mobile homes.

7	**Project Name**	CDBG Code Enforcement
	Target Area	Oakland County
	Goals Supported	Create and sustain a suitable living environment through infrastructure and public facility improvements
	Needs Addressed	Create and sustain a suitable living environment through infrastructure and public facility improvements
	Funding	$285,851.00
	Description	Code enforcement activities.
	Target Date	06/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	5,000 housing units inspected

	Location Description	Area wide
	Planned Activities	Code enforcement activities.

8	**Project Name**	CDBG Minor Home Repair
	Target Area	Oakland County
	Goals Supported	Increase and Improve Affordable Housing Options
	Needs Addressed	Increase and Improve Affordable Housing Options
	Funding	$511,705.48
	Description	Minor home repairs for the homes of income qualified households. Repairs will confirm to Oakland County guidelines and State of Michigan Lead Based Paint guidelines.
	Target Date	06/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	80 households
	Location Description	Specific and variable
	Planned Activities	Minor home repair.

9	**Project Name**	CDBG Public Facilities and Infrastructure
	Target Area	Oakland County
	Goals Supported	Create and sustain a suitable living environment through infrastructure and public facility improvements
	Needs Addressed	Create and sustain a suitable living environment through infrastructure and public facility improvements
	Funding	$636,584.00
	Description	Public facility and infrastructure improvements.
	Target Date	06/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	30,000 low-mod people assisted
	Location Description	Specific and variable
	Planned Activities	Including but not limited to: parks & recreation facilities, remove architectural barriers, senior centers, sidewalks.

10	**Project Name**	CDBG Homebuyer Assistance (13B)

	Target Area	Oakland County
	Goals Supported	Increase and Improve Affordable Housing Options
	Needs Addressed	Increase and Improve Affordable Housing Options
	Funding	$190,602.07
	Description	Providing assistance to eligible low- and moderate-income homebuyers to include subsidizing interest rates and mortgage principal; financing purchase of homes occupied by buyers; securing guarantees for private mortgage financing; providing up to half of required downpayment; and/or covering reasonable homebuyer closing costs.
	Target Date	06/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	18 low-mod households
	Location Description	Specific and variable
	Planned Activities	Homebuyer assistance.

11	**Project Name**	CDBG Homebuyer Assistance (05R)
	Target Area	Oakland County

	Goals Supported	Increase and Improve Affordable Housing Options
	Needs Addressed	Increase and Improve Affordable Housing Options
	Funding	$190,602.07
	Description	Providing assistance to eligible low- and moderate-income homebuyers to include subsidizing interest rates and mortgage principal; financing purchase of homes occupied by buyers; securing guarantees for private mortgage financing; providing up to half of required downpayment; and/or covering reasonable homebuyer closing costs.
	Target Date	06/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	18 low-mod households
	Location Description	Specific and variable
	Planned Activities	Homebuyer assistance.

12	**Project Name**	CDBG Shelter/Homeless Operations
	Target Area	Oakland County
	Goals Supported	Increase Homeless Shelter, Service, and Prevention Efforts

	Needs Addressed	Increase Homeless Shelter, Service, and Prevention Efforts
	Funding	$500.00
	Description	Cost associated with the operation of programs for the homeless such as staff costs, utilities, maintenance, and insurance.
	Target Date	06/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	To be determined
	Location Description	Specific and variable
	Planned Activities	To be determined

13	**Project Name**	CDBG Homeless Facilities
	Target Area	Oakland County
	Goals Supported	Increase Homeless Shelter, Service, and Prevention Efforts
	Needs Addressed	Increase Homeless Shelter, Service, and Prevention Efforts
	Funding	$0.00
	Description	Acquisition, construction, conversion of buildings, or rehab of temporary shelters and transitional housing for the homeless.

	Target Date	06/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	To be determined
	Location Description	Specific and variable
	Planned Activities	To be determined

14	**Project Name**	CDBG Public Services (Minus Battered & Abused)
	Target Area	Oakland County
	Goals Supported	Provide public services to expand economic opportunity, improve safety, enhance food access, and provide other assistance for low- and moderate-income households, seniors, people with disabilities, and other eligible groups.
	Needs Addressed	Provide public services to expand economic opportunity, improve safety, enhance food access, and provide other assistance for low- and moderate-income households, seniors, people with disabilities, and other eligible groups.
	Funding	$345,624.00
	Description	Various public service programs.

	Target Date	06/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	700 people assisted
	Location Description	Specific and variable
	Planned Activities	Including but not limited to: Child Care Services, Disabled Services, Emergency Services, Housekeeping Services, Senior Services, Services for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, Transportation Services, Yard Services, Youth Services, Homebuyer Down Payment Assistance.

15	**Project Name**	HOME Administration
	Target Area	Oakland County HOME Consortium
	Goals Supported	Administration and Funding of Projects
	Needs Addressed	Administration and Funding of Projects
	Funding	$347,722.29
	Description	Administration of the HOME program including management, public information and fair housing activities.

	Target Date	06/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Oakland County Neighborhood & Housing Development Division 1200 N. Telegraph Rd. Bldg. 34E, Pontiac, MI 48341
	Planned Activities	General program administration.

16	**Project Name**	HOME Housing Rehabilitation
	Target Area	Oakland County HOME Consortium Oakland County
	Goals Supported	Increase and Improve Affordable Housing Options
	Needs Addressed	Increase and Improve Affordable Housing Options
	Funding	$1,876,075.52
	Description	Direct project costs of contract work of the County's Home Improvement Program which is available to income qualified homeowners in participating communities.
	Target Date	06/30/2027

	Estimate the number and type of families that will benefit from the proposed activities	80 households assisted
	Location Description	Specific and variable
	Planned Activities	Housing rehabilitation.

17	**Project Name**	HOME CHDO Rental
	Target Area	Oakland County HOME Consortium Oakland County
	Goals Supported	Increase and Improve Affordable Housing Options
	Needs Addressed	Increase and Improve Affordable Housing Options
	Funding	$84,475.03
	Description	Contracts with qualified CHDOs to construct or rehabilitate affordable single family (1-4 units) and multifamily rental housing in HOME Consortium Communities. This investment targets renters at or below 60% of area median income.
	Target Date	06/30/2027

	Estimate the number and type of families that will benefit from the proposed activities	4 low-income families.
	Location Description	Specific and variable
	Planned Activities	Rehab or development of CHDO rental units.

18	**Project Name**	HOME CHDO Operating Expenses
	Target Area	Oakland County HOME Consortium Oakland County
	Goals Supported	Increase and Improve Affordable Housing Options
	Needs Addressed	Increase and Improve Affordable Housing Options
	Funding	$84,475.03
	Description	Fund the operating expenses of Community Housing Development Organizations (CHDOs) when carrying out Oakland County HOME funded projects.
	Target Date	06/30/2027

	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Specific and variable
	Planned Activities	CHDO operating expenses.

19	**Project Name**	HOME CHDO Homebuyer
	Target Area	Oakland County HOME Consortium Oakland County
	Goals Supported	Increase and Improve Affordable Housing Options
	Needs Addressed	Increase and Improve Affordable Housing Options
	Funding	$84,475.03
	Description	Contracts with qualified Community Housing Development Organizations (CHDOs) to develop affordable housing for income qualified homebuyers through acquisition, rehab or new construction.
	Target Date	06/30/2027

	Estimate the number and type of families that will benefit from the proposed activities	2 low-mod families.
	Location Description	Specific and variable
	Planned Activities	Housing rehabilitation, acquisition, and/or new construction.

20	**Project Name**	HOME Rental
	Target Area	Oakland County HOME Consortium Oakland County
	Goals Supported	Increase and Improve Affordable Housing Options
	Needs Addressed	Increase and Improve Affordable Housing Options
	Funding	$1,000,000.00
	Description	Acquisition, rehabilitation, or new construction of housing for affordable rental stock.
	Target Date	06/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	11 low-mod families or seniors.

	Location Description	Specific and variable
	Planned Activities	Acquisition, rehabilitation, or new construction of housing for affordable rental stock.

21	**Project Name**	ESG Administration and ESG Homelessness
	Target Area	Oakland County HOME Consortium Oakland County
	Goals Supported	Increase Homeless Shelter, Service, and Prevention Efforts
	Needs Addressed	Increase Homeless Shelter, Service, and Prevention Efforts
	Funding	$328,280.00
	Description	County's cost of administering the Oakland County ESG program. Fund qualified agency to perform data collection/evaluation through HMIS. The agency will provide reports/training/technical assistance to ESG participating agencies and the County. Funds will be provided to a qualified agency to provide rental assistance and housing relocation and stabilization services for eligible homeless and/or at risk of homelessness clients. Fund qualified shelters for eligible essential service for homeless clients, shelter operations and organizational support.
	Target Date	06/30/2027

	Estimate the number and type of families that will benefit from the proposed activities	Homeless person overnight shelter: 500 persons assisted Homelessness prevention: 100 persons assisted
	Location Description	Specific and variable
	Planned Activities	General program administration = $24,621.00 Data collection/evaluation through HMIS = $24,621.00 Rental Assistance and housing relocation/stabilization services = $106,984.00 Essential services, shelter operations and organizational support = $172,054.00

22	**Project Name**	CDBG Rental Acquisition and Rehabilitation
	Target Area	Oakland County
	Goals Supported	Affordable Housing
	Needs Addressed	Increase and Improve Affordable Housing Options
	Funding	$0
	Description	Contracts with multifamily rental property owners and developers to acquire and/or renovate existing multifamily rental properties for low- to moderate-income families.

	Target Date	06/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	234 people assisted
	Location Description	Specific and variable
	Planned Activities	Acquisition and/or rehabilitation of multifamily rental properties for low- to moderate-income families.

23	**Project Name**	CDBG Clearance and Demolition
	Target Area	Oakland County
	Goals Supported	Create and sustain a suitable living environment through infrastructure and public facility improvements
	Needs Addressed	Create And Sustain a Suitable Living Environment through Infrastructure and Public Facility Improvements
	Funding	$0
	Description	Demolition of vacant and blighted structures
	Target Date	06/30/2027

	Estimate the number and type of families that will benefit from the proposed activities	0
	Location Description	Specific and variable
	Planned Activities	Demolition of vacant and blighted structures

AP-50 GEOGRAPHIC DISTRIBUTION – 91.220(F)

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

Oakland County does not allocate investments geographically and does not plan to identify any specific Neighborhood Revitalization Strategy Areas (NRSA). Activities selected will be eligible for funding based on their ability to meet Oakland County goals, which currently prioritize housing and other similarly transformative projects.

The following 52 (85%) of Oakland County communities participate in the County's "Urban County" CDBG housing and community development programs: Cities - Auburn Hills, Berkley, Birmingham, Bloomfield Hills, Clarkston, Clawson, Farmington, Ferndale, Hazel Park, Huntington Woods, Keego Harbor, Lathrup Village, Madison Heights, Northville, Novi, Oak Park, Orchard Lake Village, Pleasant Ridge, Rochester, Rochester Hills, South Lyon, Sylvan Lake, Troy, Walled Lake, Wixom Townships - Addison, Bloomfield, Brandon, Commerce, Groveland, Highland, Holly, Independence, Lyon, Milford, Oakland, Orion, Oxford, Rose, Royal Oak, Springfield, West Bloomfield, White Lake Villages - Beverly Hills, Franklin, Holly, Lake Orion, Leonard, Milford, Ortonville, Oxford and Wolverine Lake. Farmington Hills, Royal Oak, Southfield, Pontiac, and Waterford Township are HUD entitlement communities. These communities with over 50,000 residents are "entitled" to receive HUD funds and have chosen to administer their own CDBG programs. The City of Lake Angelus, Novi Township, Southfield Township and the Village of Bingham Farms do not receive HUD funds.

Oakland County's Recapture and Reallocation Policy allows the County to take back CDBG funds from participating communities if they remain unobligated for two years, ensuring compliance with federal timeliness rules. The County then redistributes these recaptured dollars to communities or projects that can spend them quickly and effectively, helping maintain HUD's required expenditure pace and directing resources to activities that benefit low- and moderate-income residents.

Oakland County HOME Consortium - Oakland County serves as the lead entity for the Oakland County HOME Consortium (OCHC), which is comprised of the Urban County of Oakland, Farmington Hills, Royal Oak, and Southfield. The HOME program funds HIP, Rental Development/Preservation gap financing and CHDO activities throughout Consortium communities.

Geographic Distribution

TABLE 61 - GEOGRAPHIC DISTRIBUTION

Target Area	Percentage of Funds
Oakland County HOME Consortium	33%
Oakland County	67%

Rationale for the priorities for allocating investments geographically

Oakland County does not allocate investments geographically and does not plan to identify any specific Neighborhood Revitalization Strategy Areas (NRSA). Activities selected will be eligible for funding based on their ability to meet national program objectives and Consolidated Plan goals.

OAKLAND COUNTY MICHIGAN
NEIGHBORHOOD & HOUSING DEVELOPMENT

2026-2030

Affordable Housing

AP-55 AFFORDABLE HOUSING – 91.220(G)

Introduction

Considering only HOME program funds and programs, The County anticipates assisting 61 homeowners with home repairs, and producing 8 new units of affordable housing.

TABLE 62 - ONE YEAR GOALS FOR AFFORDABLE HOUSING BY SUPPORT REQUIREMENT

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	69
Special-Needs	0
Total	69

TABLE 63 - ONE YEAR GOALS FOR AFFORDABLE HOUSING BY SUPPORT TYPE

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	8
Rehab of Existing Units	61
Acquisition of Existing Units	0
Total	69

AP-60 PUBLIC HOUSING – 91.220(H)

Introduction

Public housing within the Oakland County consortium is provided through a large number of Housing Authorities under the jurisdictions of its various member communities. Oakland County itself does not administer a PHA but rather collaborates with and supports its various member PHAs. Planned activities relating to this are detailed below.

Actions planned during the next year to address the needs to public housing

The County has regular meetings with the Pontiac Housing Commission on the needs for public housing and partnership opportunities to bring housing to families.

Through the County's HOME, CDBG, and Housing Trust Fund rental development and rehabilitation programs, the County has supported the creation or preservation of 981 project-based voucher units. Additional units may be supported by the Housing Choice Voucher program at the various properties in which the County has invested federal and local funds.

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

Oakland County housing counselors will meet with public housing residents and/or housing choice voucher holders to explore the potential for future homeownership including converting a rental voucher to a homeownership voucher. The housing counseling unit provides referrals to each local PHC. The status of each PHC waiting list is provided to the Neighborhood & Housing Development Division through its Alliance membership.

NHD is currently working with an Oakland County CHDO to convert 7 rental units from the LIHTC program to homeownership using CDBG funds. 6 of the 7 rental units have closed with first time homebuyers. The final unit is expected to sell in 2026. NHD and the HTF have invested funds into additional rental conversion properties; however, the units will not be available in the near term due to LIHTC compliance regulations.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

N/A

AP-65 HOMELESS AND OTHER SPECIAL NEEDS ACTIVITIES – 91.220(I)

Introduction

Oakland County works closely with the Alliance for Housing, which serves as the jurisdiction's Continuum of Care and lead agency organizing service providers in the area. The Continuum of Care secures and distributes funding for direct service providers in the housing and homeless community and provides guidance to strengthen policies and programs. Homeless needs activities were identified as an urgent need during the community engagement and data analysis processes. Planned activities relating to this are detailed below.

The Blueprint to End Homelessness was developed in 2021 and is comprised of more than 60 stakeholders, including Oakland County Neighborhood and Housing Development, Community Corrections, the Alliance for Housing, Oakland University William Beaumont School of Medicine, HOPE, Community Housing Network, Lighthouse, Haven, Samaritas, Street Democracy, the City of Ferndale, Centro Multicultural de la Familia, and many others. As the lead nonprofit agency dedicated to ending homelessness and coordinating housing and funding to support Oakland County residents experiencing homelessness, the Alliance for Housing serves as the local Continuum of Care (CoC).

These stakeholders meet regularly to implement action items that address all facets of homelessness. Meetings are chaired jointly by NHD leadership and the Alliance for Housing. In 2026, an updated Blueprint to End Homelessness will be finalized, reflecting progress made to date and outlining next steps for continued system improvement.. This Blueprint also serves as a roadmap for strategic planning and actions towards reducing and ending homelessness.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Oakland County through is HOME/CDBG funding and Housing Trust Fund have closed 1,395 units of affordable housing in the near-term pipeline that will provide safe, decent, and affordable housing to prevent residents from becoming homeless. This pipeline will also serve as permanent housing for residents of existing emergency shelters and transitional housing. NHD has additional units currently in the pipeline to support these efforts.

Oakland County also plans to fund and support additional shelter capacity throughout the County using both federal grant funding and other County resources.

Addressing the emergency shelter and transitional housing needs of homeless persons

Oakland County has funded 21 units resulting in 98 total beds of non-congregant housing using HOME-ARP and ARPA funding that is anticipated to be operational by the end Program Year 2027. Oakland County also seeks to acquire and/or build transitional housing for youth aging out of foster care, young mothers and families, veterans, and other residents.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Oakland County, in partnership with the Alliance for Housing (the local Continuum of Care), implements a coordinated system of ESG funded services, housing counseling, and supportive programs designed to help individuals and families experiencing homelessness especially chronically homeless households, families with children, veterans, and unaccompanied youth transition to permanent housing as quickly as possible and maintain long term stability.

Through ESG funded rapid re housing and prevention, housing counseling, wrap around services, HMIS driven system planning, and the strategic framework of the Blueprint to End Homelessness, Oakland County is committed to helping individuals and families transition quickly into permanent housing, maintain long term stability, and prevent future homelessness. The County's investments in new affordable housing and its strong partnerships across more than 60 agencies ensure a comprehensive and effective response to homelessness.

Oakland County uses ESG funds to support a Homeless Prevention and Rapid Re Housing (HPRRH) program administered by Lighthouse and Community Housing Network. These agencies provide rental assistance, rental fees, utility assistance, housing search support, and case management to households who are homeless or at imminent risk of homelessness. Lighthouse offers a twelve month follow up program that includes in home case management, with 90% of participants maintaining housing after one year. These interventions significantly shorten the length of time households experience homelessness and support long term housing stability.

Providing Housing Counseling is a key component of the County's strategy to support successful transitions into permanent housing. Counseling services include budgeting, tenant education, landlord mediation, and assistance navigating affordable housing opportunities. By now using outreach methods such as Wellness Wednesdays and Friendship Fridays we can increase access to HUD Certified Housing Counseling through wraparound services and supporting housing readiness

Since the inception of Wellness Wednesdays, Oakland County has provided 2,332 individuals with wrap around services that reduce barriers to housing and support independent living. These include:

- 228 with Housing Counseling Services
- 596 guests accessing shower services
- 538 loads of laundry completed
- 141 individuals receiving medical support
- 173 individuals connected to resources through Oakland Connects
- 69 individuals assisted by Community Housing Network
- 40 individuals supported by Lighthouse

These services improve health, stability, and readiness for permanent housing. Shortening the Length of Homelessness. The Continuum of Care tracks and analyzes the length of time individuals and families experience homelessness using HMIS. Current data shows:

- Families are typically homeless 1–3 months before entering a program
- Individuals entering shelter are typically homeless one week or less
- Individuals entering transitional or permanent housing programs are typically homeless 1–3 months

Length of stay data is reviewed regularly by the Systems Implementation and Coordination Committee, which develops strategies to reduce time spent being homeless and improve system operations.

The Continuum of Care actively tracks returns to homelessness through HMIS and produces quarterly reports on exits from rapid re housing, transitional housing, and permanent supportive housing. These reports are reviewed by the CoC Board and the Project Monitoring and Performance Outcomes Committee to identify trends, strengthen program practices, and improve follow up care. Program specific technical assistance includes an examination of exit procedures as well as follow-up care procedures and accessibility.

Oakland County continues to expand the supply of affordable and supportive housing to ensure that individuals exiting homelessness have access to long term housing options. Recent and upcoming developments include:

- Shepherd House, a 53-unit permanent supportive housing community in Ferndale
- 166 additional affordable housing units under construction in Pontiac and Southfield, expected to be completed in PY 2026 or shortly thereafter

These units increase the availability of permanent housing for individuals and families transitioning from homelessness.

The Blueprint to End Homelessness guides the County's long-term strategy to reduce homelessness and improve system performance. The Blueprint establishes goals focused on preventing homelessness before it occurs, strengthening coordinated outreach, improving access to shelter and crisis response, expanding pathways to permanent housing, and increasing stabilization supports to ensure long term housing retention. Stakeholders meet regularly to implement action items aligned with these goals, addressing prevention, outreach, shelter, housing, and stabilization across the entire homelessness response system. An updated Blueprint will be finalized in 2026, reflecting progress made to date and outlining new strategies to strengthen the homelessness response system.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

Oakland County also seeks to acquire and/or build transitional housing for youth aging out of foster care, young mothers and families, veterans, and other residents. Oakland

County through is HOME/CDBG funding and Housing Trust Fund also have 1,395 units of affordable housing in the near-term pipeline that will provide safe, decent, and affordable housing to prevent residents from becoming homeless. This pipeline will also serve as permanent housing for residents existing emergency shelters and transitional housing.

AP-75 BARRIERS TO AFFORDABLE HOUSING – 91.220(J)

Introduction:

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Oakland County's 2020 Analysis of Impediments to Fair Housing Choice (AI) identifies several challenges related to housing affordability and access as county's barriers to fair housing choice. The AI also includes a review of the county's existing zoning code and identifies policies that may limit the development of affordable housing in the region.

Housing problems and limited access to homeownership disproportionately impact protected classes

Analysis of 2008-2017 homeownership data from the Housing Mortgage Disclosure Act (HMDA) showed that the mortgage denial rate in Oakland County is disproportionately among Black and African American households, who had an average denial rate of 29%. This denial rate was significantly higher than the county's overall average of 15%. Comparatively, White households had the county's lowest average denial rate at 13%.

Additionally, Comprehensive Housing Affordability Strategy (CHAS) data analysis on housing needs performed in this Consolidated Plan revealed that Black households exhibited disproportionately high rates of housing problems compared to the county as a whole.

Disparate patterns in lending, moderate to high levels of segregation, insufficient affordable housing in a range of unit sizes, racial minority households with disproportionate rates of housing problems, insufficient accessible affordable housing, and discrimination on the basis of disability were all identified as high priority contributing factors that impacted fair housing choice in the county's latest AI.

Zoning, Affordability, and Housing Choice

Although zoning ordinances and land use codes play an important role in regulating the health and safety of the built environment, overly restrictive codes can negatively impact housing affordability and fair housing choice within a jurisdiction. A Land Use Planner Survey of jurisdictions' zoning codes and land use regulations was conducted to identify any barriers that might impede access to housing. This survey found that most jurisdictions define the word "family" as related by blood, marriage, or adoption or "related" in any other traditional sense, which may limit access to housing choice. In

addition, few jurisdictions actively encourage affordable housing development or inclusionary policies.

Barriers to housing access in the private market

In addition to these public-sector barriers, the private market can also create barriers. Some landlords may refuse to rent units to households receiving other forms of housing assistance. This practice, known as source of income discrimination, reduces the affordability of existing units in the private housing stock and creates barriers to obtaining affordable housing. While source of income discrimination is illegal in the state of Michigan, many residents still struggle to find landlords willing to accept Section 8 or Housing Choice Vouchers for reasons ranging from stigma and discrimination to landlord concern about the potential for added cost. Housing Choice Vouchers make up a significant portion of publicly supported housing within Oakland County and are a key element in providing affordable housing to the county's most vulnerable populations. Because of this, landlord reluctance presents a significant barrier to affordable housing.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Oakland County has implemented several strategies to increase access to affordable housing in the region through countywide programs and partnerships with area nonprofits and service organizations. These actions include the County's establishment of the Housing Trust Fund (HTF) in 2023, which supports the development and preservation of affordable, attainable, workforce, and mixed-income housing throughout the county. Eligible applicants for HTF funds include developers, Community Housing Development Organizations (CHDOs), government entities, local housing commissions/authorities, and other housing-related development/preservation entities. The HTF and NHD have been successful in working with their local city, village, and township partners to approve zoning changes, payment in lieu of taxes (PILOTs), tax increment financing districts, and other local control matters that has resulted in the creation or preservation of over 1,550 mixed-income housing units.

The Unlocking Doors Oakland County Program also helps remove barriers to housing for homeless individuals receiving voucher assistance. This program incentivizes landlords to rent their home or apartment to a homeless individual with a housing voucher by providing up to $3,000 in assistance for minor unit repairs if they participate.

AP-85 OTHER ACTIONS – 91.220(K)

Introduction:

This section details Oakland County's plans to ensure safe and affordable housing for its residents, meet underserved needs, reduce poverty, develop institutional structure, and enhance coordination between public and private sector housing and community development agencies.

Actions planned to address obstacles to meeting underserved needs

Residents and stakeholders who participated in this planning process noted that underserved needs in Oakland County include housing affordable to residents with low or moderate incomes; housing and services for people experiencing or at risk of homelessness; and a range of public services and facilities to meet specific community needs. Obstacles to meeting underserved needs include:

- Loss of existing affordable housing due to factors such as increasing rents and home values and aging housing stock in need of rehabilitation
- High costs of new development and associated need for subsidies for development of new affordable housing
- Increasing homelessness due to high housing costs and need for services to connect residents with permanent housing and services, and
- Limited funding to provide needed services and facilities.

To develop additional resources to address affordable housing, homelessness, and public services and facilities needs, Oakland County will fund a variety of projects to meet underserved needs such as affordable housing, homelessness, public facilities and infrastructure, and public services. The County will continue to leverage a variety of funds, including CDBG, HOME, and HTF funds to accomplish this work.

Actions planned to foster and maintain affordable housing

To maintain and expand the current affordable housing stock, Oakland County through NHD and the HTF, will continue to identify and develop partnerships with nonprofit housing organizations and housing developers with the goal of increasing the supply of affordable housing by leveraging outside resources and their development experience. These may include LIHTC or other developers considering housing projects in the county. The County will also look at using funding or grants that can be leveraged to bring new dollars for affordable housing or homelessness into the community. Finally, the County will continue to increase housing affordability by providing funding for

infrastructure to support affordable housing development, accessibility and home repair programs, and tenant-based rental assistance.

In addition to specific programs designed to foster and maintain affordable housing, participating cities will review zoning ordinance for prospective barriers to affordable housing development and make amendments as needed, including possible changes that would decrease costs or risk for multifamily and other affordable housing developments, and identifying zones where multifamily and other affordable housing types, such as accessory dwelling units or smaller homes, may be built as-of-right.

Actions planned to reduce lead-based paint hazards

An important initiative emanating from HUD in the last decade is the reduction of lead-based paint hazards, and many jurisdictions around the country have focused on reaching this goal. The federal Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X of the Housing and Community Development Act of 1992) amends the Lead-Based Paint Poisoning Prevention Act of 1971, which is the law covering lead-based paint in federally funded housing. These laws and subsequent regulations issued by the U.S. Department of Housing and Urban Development (24 CFR part 35) protect young children from lead-based paint hazards in housing that is financially assisted or being sold by the federal government.

Should Oakland County undertake any property rehabilitation projects, the County will assess whether lead-based paint might be present and, if so, follow the guidelines set forth in the Residential Lead-Based Paint Hazard Reduction Act of 1992. Oakland County is committed to testing and abating lead in all pre-1978 housing units assisted with federal grant funds in any of the housing programs it implements.

Actions planned to reduce the number of poverty-level families

Supportive services such as homeless prevention/assistance, emergency rental/utility assistance, food assistance, education, and health resources are offered by a variety of area nonprofits and organizations, including Oakland Livingston Human Service Agency (OLHSA), Community Housing Network (CHN), Lighthouse, and HOPE Shelters, among others. These organizations are guided by the goal of reducing the number of Oakland County households living in poverty through direct assistance via financial aid, food pantries, clothing distribution, and other wraparound services that help residents meet basic needs and move toward long-term stability.

In addition, NHD and the HTF have invested in the development or preservation of 1,550 mixed-income housing units including 981 project-based voucher units. Included in the 981 voucher units are 173 permanent supportive housing units. NHD is committed to providing and connecting Oakland County residents with wrap around services intended to eliminate housing insecurity.

Actions planned to develop institutional structure

The unmet needs of rental housing affordable to low-income residents and social services for individuals and families experiencing or at risk of homelessness present an opportunity for the County to further connect with and support organizations, affordable housing developers, and agencies working to address these needs in Oakland County. The County will also continue to work within existing partnerships and coalitions, such as the Alliance for Housing to work toward meeting local housing and service needs. Oakland County will continue to work closely with state and local agencies and governments, nonprofit organizations, and other service providers to coordinate delivery of services to county residents. The Neighborhood and Housing Development Division will continue to consult with various housing, homelessness, social service, elderly, and disability resource agencies to gather data and identify service gaps.

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

Oakland County will continue to be an active participant in the Alliance for Housing, which secures and distributes funding for direct service providers in the housing and homeless community and provides guidance to strengthen policies and programs. This work includes street outreach, emergency shelter, transitional housing, rapid rehousing, prevention and diversion, and permanent supportive housing. The County will also continue to partner with regional organizations, such as the Southeast Michigan Economic Development Council, to enhance coordination between area agencies.

OAKLAND COUNTY MICHIGAN
NEIGHBORHOOD & HOUSING DEVELOPMENT

2026-2030

Program Specific Requirements

AP-90 PROGRAM SPECIFIC REQUIREMENTS – 91.220(L)(1,2,4)

Introduction:

CDBG Revolving Loan Funds are used to support Home Improvement Program projects in accordance with CDBG & HUD guidelines.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	98%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

   Other forms of investment include private and other public investments. HOME funds will not be invested in a loan guarantee as an eligible activity as indicated in 24 CFR 92.205(b).

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

   The Oakland County Neighborhood & Housing Development Division has comprehensive program guidelines which provide for the recapture of HOME funds in compliance with program requirements 24 CFR 92.254(a). Under the recapture provision, the HOME investment subject to recapture is the HOME assistance that enables the homebuyer to afford the dwelling unit. This homebuyer assistance is a subsidy ($1,000.00 minimum) that makes the home affordable to a low-income homebuyer. The County's home buyer assistance is a deferred payment loan with 0% interest. The Division secures its interest in the property with a mortgage and note. One hundred percent of the HOME investment is recaptured upon conversion of property use and/or ownership unless, due to foreclosure, there are not enough proceeds to pay the full amount of the loan. The County will accept the balance of the net proceeds as payment in full, the debt will be extinguished and the affordability period ends. Recaptured funds must be used to carry out HOME eligible

activities.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

   The HOME Program stipulates an affordability period on projects assisted with HOME funds to ensure that HOME investments yield affordable housing over the long term. Section 215 of the National Affordable Housing Act outlines the term "affordable housing". To qualify as affordable, all rental and homeownership units constructed or rehabilitated with HOME funds must adhere to the regulation. It is the responsibility of each HOME participating jurisdiction to report to HUD the number of affordable units completed on an annual basis. Although the CDBG program does not require the qualification of units as "affordable" following the HOME Section 215 regulations, it is useful to keep track of affordable units rehabilitated with CDBG funds. Oakland County meets Section 215 requirements as:
   - HOME assisted units are available for households at 80% of area median income (AMI) or below
   - Initial purchase price of units does not exceed HUD Homeownership Value Limits
   - The units serve as the owner's principal residence
   - All newly constructed housing meets energy efficiency standards
   - Recapture provisions allow the County to provide assistance as a deferred loan secured by mortgage and note (0% interest)
   - The loan becomes due and payable when the homeowner vacates, sells, transfers, or assigns any legal or equitable interest in the property except where prohibited by law. Upon the deaths of the loan recipients, it is the responsibility of the estate or heirs to repay the loan when the estate is settled.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

   The Oakland County HOME Consortium does not intend to refinance existing debt secured by multifamily housing rehabilitated with HOME funds.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

Not Applicable.

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

   Not Applicable.

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

   Not Applicable.

Emergency Solutions Grant (ESG) Reference 91.220(l)(4)

1. Include written standards for providing ESG assistance (may include as attachment)

For the Homeless Assistance and Rapid Re-housing portion of the grant, recipient agencies will conduct an initial evaluation to determine each individual or family's eligibility for ESG assistance and the amount and types of assistance the household needs to regain stability in permanent housing. The evaluations will be conducted in accordance with the centralized assessment requirements of the Oakland County Continuum of Care. Eligibility requirements for the Rapid ReHousing and/or prevention components of the program include:

- The program participant must meet the criteria under the Federal homeless definition as amended under the HEARTH act. A homeless certification form is required.
- The household income must be less than 30% of AMI. Annual income will be calculated using the standards for calculating income under HOME and Section 8 income guidelines.
- The household cannot have assets more than $1,000 for an individual or $2,000 for a family
- The program participant lacks enough resources and support networks necessary to retain housing without ESG Assistance, but for this assistance they

would be homeless.

After an initial evaluation, a housing plan will be developed, and a participant must meet with his or her caseworker as prescribed under the plan. Unless prohibited under the Violence Against Women Act, as amended or the Family Violence Prevention and Services Act, the recipient will be connected to appropriate supportive services including assistance in obtaining permanent housing, mental health treatment, counseling and other services essential for achieving independent living. They will also be linked to federal, state, local and private assistance available to assist with obtaining housing stability including Medicaid, food assistance, WIC, unemployment benefits, SSI, SSDI, Veteran's benefits, medical assistance, legal aid, employment assistance and other locally available assistance programs. A plan will be developed to assist the program participant to retain permanent housing after the assistance ends, considering all relevant considerations such as the program participants current or expected income and expenses, other public or private assistance for which the program participant will be eligible and likely to receive and the affordability of available housing in the area. Each participant will be linked to available PSH programs or the local HCV, Section 8 Voucher Programs, Public Housing Authorities and project based rental assistance when the waiting lists are open.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

Oakland County agencies practice a no wrong door approach. Coordination among emergency shelter providers, essential services providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers and mainstream services and housing providers will be done through HMIS sharing, the centralized assessment form, the local Homeless Assistance and Recovery Agency (HARA) and the Community Inter-Agency Service Team (CIST). All ESG recipients will be required to be an active member of the Continuum of Care and attend bimonthly meetings. At these meetings, case managers can share information and resources and assist each other with resources for clients. MSHDA and Michigan DHHS with the full support from the Michigan Coalition Against Homelessness requires the use of a single assessment tool for people experiencing homelessness. This tool, known as the Vulnerability Index - Service Prioritization Decision Assistance Tool (VI-SPDAT) will provide HARAs and other housing agencies with a standardized, evidence-informed assessment process that prioritizes vulnerability. Michigan's Campaign to End Homelessness is committed to Housing First and has identified VI-SPDAT as the tool that will be implemented in every community so that our state moves forward in ending homelessness while supporting HEARTH Act regulations.

Youth programs are exempt and use their own similar statewide assessment tool. Oakland County providers meet once a month and have calls weekly to discuss VI-SPDAT scores and prioritize program openings based on need

VI-SPDAT training is provided and offered free of charge. The training is mandatory for HARA midlevel management, HARA front line staff, DHHS Continuum of Care mid-level management and DHHS Continuum of Care Program front line staff. The DHHS Continuum of Care Program includes the following projects: Rapid Re-Housing Initiative, Transitional Supportive Housing Leasing Assistance Program, Rural Housing & Supportive Services and the Rural Homeless PSH Initiative. HARA and DHHS Continuum of Care Program and Executive Directors are strongly encouraged to attend the training. HMIS entry is not granted to agency employees until VI-SPDAT training has been completed.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

   Generally, each June the Division hosts an ESG application workshop. The workshop is advertised in the Oakland Press, on the Oakland County website and on the Alliance for Housing list serve. The workshop provides details on the application requirements for the emergency shelter, HMIS and homeless prevention and rapid re-housing activities. Applicants are required to submit supporting documents including non-profit status, HMIS certification, non-debarment status, financial statements, insurance, policies and procedures and budgets. All emergency shelters that meet the application requirements receive funding based on formula. The lead agency of the CoC receives the HMIS funds. HPRP is scored based upon specific criteria and the awards are determined by committee. One-year contracts are awarded once funds are released.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

   The Division has a member of Citizen Advisory Council who was previously homeless and was “couch surfing” with her child for a period of time. Though this does not meet the official definition of homeless, Oakland County is committed to having representation of formerly homeless individuals on its advisory board. However, through consultation with the Continuum of Care and citizen participation process, the County obtains input from homeless or formerly homeless persons. In

addition, as previously required in the ESG and Homeless Prevention and Rapid Re-Housing Program, the Division is passing this requirement on to funded agencies via contract language. This requirement will be checked at monitoring. The Continuum of Care has a formerly homeless person on their board. The Continuum of Care provides input to the Division on the ESG program.

5. Describe performance standards for evaluating ESG.

ESG Monitoring Standards and Procedures - Oakland County will continue to implement a monitoring policy to ensure that ESG recipients follow applicable requirements. Annual onsite monitoring of shelters and transitional housing providers will include inspections to ensure that housing conforms to habitability standards under the HEARTH Act as well as LBP regulations. In addition to project performance, accountability, financial responsibility and adherence to federal grant management regulations. Monitor reviews will sample client files to ensure that case management, action plans and referrals to mainstream benefits are provided and the files are maintained appropriately.

Reimbursement requests will be reviewed, and cross referenced with contracts and procurement documents as warranted. Rapid re-housing and homeless prevention files will be checked to ensure that all required documents including homeless certification forms, income calculations, lease, recertification documents and habitability inspection reports are accurate. In addition, before reimbursement can be made verification will be required including certification of homelessness, lease documents, income calculations, as well as cancelled checks and invoices. A contract will be developed requiring quarterly reimbursement requests and timely expenditure of funds. Monitoring was done via desk audits or in person as the COVID-19 pandemic restrictions allow.

Performance Measures - Oakland County's ESG program complies with CoC performance measurements which are available at https://www.oaklandhomeless.org/

Homeless - 65% of participants who meet the homeless definition will be stably housed 90 days after being exited from ESG/HARA through independent means or through linkage to another program (e.g. PSH, subsidized housing).

Chronically Homeless - 50% of participants who meet the chronically homeless definition will be stably housed 90 days after being exited from ESG/HARA through independent means or through linkage to another program (e.g. PSH, subsidized

housing).

In April 2016, MDHHS, MSHDA and MCAH issued an important update to the SPDAT which outlines the VI- SPDAT and SPDAT requirements. SPDAT has brought Michigan further along in the goal to redesign systems by providing every community a standardized evidence-based tool to support coordinated entry while taking Housing First practices to scale statewide. Since the implementation of the VI-SPDAT, the Alliance has reported that the tool helps them gauge the progression of client self-sufficiency as it relates to housing. Because the full VI-SPDAT is used during every follow-up meeting completed with active ESG clients assisted, it is instrumental in practicing progressive engagement with clients to ensure not only that basic needs are being fulfilled but that linkage to other resources is being made. Additional MSHDA/ESG outcomes include:

- Percentage of those served who maintain housing one year after assistance ends (RRH and Prevention)
- Percentage of clients that increase income within that year and/or within the timeframe of active housing assistance
- Length of time between screening/intake and moving into housing
- Minimum number of households served each PY Modifications to the residency factor in the ESG formula have been discussed at the staff level. The Division plans to meet with stakeholders and to present any proposed changes for CAC and BOC consideration. For the PY 2026-2030 Consolidated Plan the Division will follow its Citizen Participation Plan amendment process if required to address any ESG formula changes that may impact the County's program.