



# **Charter Township of Canton, Michigan**

**C.A.P.E.R.**

**PY 2015**

**B-15-MC-26-0039**

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# Fifth Program Year CAPER

The CPMP Fifth Consolidated Annual Performance and Evaluation Report includes Narrative Responses to CAPER questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

The grantee must submit an updated Financial Summary Report (PR26).

## GENERAL

### Executive Summary

This module is optional but encouraged. If you choose to complete it, provide a brief overview that includes major initiatives and highlights that were proposed and executed throughout the first year.

Program Year 5 CAPER Executive Summary response:

### General Questions

1. Assessment of the one-year goals and objectives:
  - a. Describe the accomplishments in attaining the goals and objectives for the reporting period.
  - b. Provide a breakdown of the CPD formula grant funds spent on grant activities for each goal and objective.
  - c. If applicable, explain why progress was not made towards meeting the goals and objectives.

Canton's overall goals under the CDBG strategic plan are to provide stability in the market for existing and older housing while accommodating the demand for comparatively inexpensive low-density new housing. Canton Township has very few areas in which 51 percent of the residents are low and moderate income. For this reason, Canton Township is considered an "exception grantee" with an exception percentage of 29.31%. This makes it extremely challenging to perform a Low/Moderate Income Area (LMA) Area Benefit activity.

The PY 2015 CDBG action plan is broader than the strategic housing plan as it includes non-housing program elements. The PY 2015 Action Plan includes the following projects: First Step, \$15,000; Neighborhood Legal Services Michigan, \$13,000; Summit Scholarships, \$1,500; Tutoring Services for At Risk Youth, \$3,615; Growth Works, \$1,500; Wayne-Metropolitan Community Action Agency, \$15,000; Housing Rehabilitation, \$125,000; Administration and Planning, \$66,153; ADA Projects 65,000, Historic Building rehabilitation, \$75,000. The PY 2015 CDBG budget was \$380,653

It should be noted that all projects are categorized as benefiting low and moderate income persons. The projects are all discussed in the strategic plan.

Progress was made toward each and every goal and objective.

2. Describe the manner in which the recipient would change its program as a result of its experiences.

### No changes are planned

3. Affirmatively Furthering Fair Housing:
  - a. Provide a summary of impediments to fair housing choice.
  - b. Identify actions taken to overcome effects of impediments identified.

In the fall of 2015, Canton contracted with Wade Trim to perform and prepare Canton's Assessment of Fair Housing (2016-2020). The research, surveying, and interviews conducted for the AFH did not identify any substantial fair housing impediments within the Township of Canton. Canton has made some efforts to be proactive in supporting fair housing education, although public education needs to be more consistent throughout.

A racially or ethnically concentrated area of poverty (R/ECAP) is a geographic area with significant concentrations of poverty and minority concentrations. In Canton Township there are no R/ECAP census tracts.

In 2013, 2014 and 2015 Canton Township set aside a portion of the administration funds to recognize April as "Fair Housing Month" and to present our 1st and 2<sup>nd</sup> annual Fair Housing Seminars. On April 10<sup>th</sup> 2014, Canton hosted its first annual Fair Housing Seminar and on April 21<sup>st</sup>, 2015 Canton hosted its second annual Fair Housing Seminar. A free presentation was provided to landlords or tenants and attorneys were on-site to provide free consultations. We were unable to host a presentation this year as our "administration funds" were allocated for the HUD required 5 Year Consolidated Plan and the Assessment of Fair Housing. Canton plans to provide a Fair housing presentation in April of 2017.

Fair Housing Testing: In January of 2015, Canton hired the Fair Housing Center of Metropolitan Detroit to conduct fair housing testing services. The testing occurred at Canton's Canton Place Apartments. One variable being tested was Race, the other was Physical Handicap. The evaluation for race concluded that there was "no significant difference" in the way the testers were treated. The evaluation for physical handicap was "inconclusive" as the tester was unable to see the agent.

Since Canton does not qualify for Public Housing, we are limited in our resources. Canton's only affordable housing resource /fair housing activity under HUD/CDBG is the housing rehabilitation program. Canton continually strives to repair and rehab older homes and mobile homes in the community to provide affordable housing stock.

4. Describe Other Actions in Strategic Plan or Action Plan taken to address obstacles to meeting underserved needs.

A variety of programs were initiated to empower underserved and underrepresented persons to become involved in Canton activities and committees. Our Summit scholarship program pays activity fees for income-eligible residents to participate in the programs at our community center (Summit on the Park). The Tutoring Services at our Youth and Teen Center

provides professional academic tutoring services for income-eligible at risk youths ages 11-17.

Because of Canton's relative affluence, underserved community needs as defined by HUD criteria have historically been difficult to identify in the community and even more difficult to quantify, even using HUD data. In late 1998, the owners of Fellows Creek Apartments announced the prepayment of the Section 236 20-year mortgage and the decision to convert the 146-unit complex to market-rate condominiums. Canton, as described previously, cooperated fully with HUD Multifamily Housing officials and staff in allaying tenant fears. The loss of assisted housing is totally outside Canton's control, since all assisted housing in the township is in private ownership. There are no plans to replace the lost affordable units, although some tenants were able to finance the purchase of their units.

In Canton's 5 Year Consolidated Plan, the following strategies were adopted to address these barriers.

1. Continue to assess and use local building codes to simply guarantee housing that meets minimum standards. In 2014 Canton recognized the need for a residential rental program. This program was needed to ensure all safety and applicable building codes were being provided to our residents renting homes and apartments. The registration and inspection program for residential rental units was implemented for the health and safety of its residents and to provide an efficient system for compelling landlords to correct violations and to maintain, in proper condition, rental property within Canton. In fiscal year 2015, ordinances were adopted and employees were hired to inspect these housing units. This public policy has removed a barrier to affordable housing. Other township polices are reviewed annually.
2. Foster the quality of manufactured housing. In 2014, Canton was able to use CDBG funds to rehabilitate 8 mobile/manufactured homes thus maintaining affordable housing stock.
3. Where possible and appropriate, promote the use of alternative labor in housing programs through self-help initiatives such as habitat for humanity. In 2014, Canton welcomed Habitat for Humanity into our Human Service Center. We hope to partner with this organization in the future to help build affordable homes for low-income persons.
4. Provide funding for owner-occupied rehabilitation for households with incomes at or below 80% of AMI. Canton Township was able to use \$73,363 (22%) of our funds to rehabilitate homes for low-income persons. Data is provided in other sections of the CAPER.
5. Leveraging Resources
  - a. Identify progress in obtaining "other" public and private resources to address needs.
  - b. How Federal resources from HUD leveraged other public and private resources.
  - c. How matching requirements were satisfied.

CDBG Federal Funds. Canton, typically, does not have many opportunities to leverage CDBG funds since its CDBG program is small and relatively conservative in its objectives. Canton's experience with its Human Services Center does, however, leverage CDBG funds, since the renovation of the building with Township and federal funds and ownership by the Township have permitted lease of the building to a lead agency (Growth Works) for a nominal rent.

Growth Works, through its agreement with Canton, is passing its savings on to its subtenants, who are paying below market rents. The tenants also have the ability to rent space only as needed, since a goal is to make it possible to rent as much or as little space as is needed for as long as it is needed. Thus, it is possible to rent space for only one or two days a week. This is particularly beneficial for agencies that need only consultation or counseling space or are trying to establish a presence in Canton. The affordable rent is especially suited to small local service agencies which may be struggling financially but nevertheless have a history of providing needed services at a very low cost and are otherwise integral to the wrap-around concept. The center was an early success and is used by several major service providers including Growth Works, Canton Community Foundation, Neighborhood Reconciliation Services, Partnership for the Arts & Humanities and the Charisma Life Christian Churches. The Human Services Center is located in the Cherry Hill Historic District at the intersection of Cherry Hill and Ridge Roads in western Canton.

Neighborhood Stabilization Program. In the fall of 2008, Canton was allocated \$2,182,988 under The Neighborhood Stabilization Program (NSP). The NSP is authorized by the Title III of Division B of the Housing and Economic Recovery Act, 2008 (HERA). Funds under the act may be used to buy foreclosed and abandoned homes; to buy land and property; to demolish or rehabilitate abandoned properties; and to offer down payment and closing cost assistance to middle income (less than 120% of Area Median Income (AMI)) homebuyers. The funds must be obligated within 18 months of receipt of the award agreement from the Department of Housing and Urban Development (HUD), and all funds must be spent within four years of agreement receipt. Any funds remaining at the end of the four years are recaptured by HUD.

NSP funds must be distributed to geographic "areas of greatest need" in the community. Need is determined by areas which meet the three qualifiers of the greatest percentages of home foreclosures, the highest percentages of homes financed by subprime mortgage instruments, and which have been identified by the community as likely to face a significant rise in the rate of foreclosures,

At least 25 percent of Canton's funds (\$545,747) must be used for the purchase or redevelopment of abandoned or foreclosed residential properties to house individuals or families whose incomes do not exceed 50 percent of the Area Median Income. (\$34,950 for a family of four.) The remaining funds (a maximum of \$1,637,241) must be used to assist individuals and families whose incomes do not exceed 120 percent of the Area Median Income (\$85,200 for a family of four). Canton must ensure that homebuyers undergo at least eight hours of homebuyer counseling and do not use a subprime mortgage in the home purchase.

To date, Canton has purchased 13 homes with NSP grant money further increasing our stock of affordable homes. 13 homes have been rehabilitated and sold. 5 Homes were rehabbed and sold to eligible low income families who do not exceed the 50 % of Area Median Income.

In 1988, Canton used CDBG funds to purchase an historic one-room school house on Michigan Avenue. Two human service agencies have occupied the building in the interim. The first was a senior adult day care agency. Presently, the building is occupied by Head Start and used as a school. Since purchase, Canton has rented the building at considerably less than market rent to keep it attractive to human service agencies. The FY 2005 CDBG program allocated \$15,000 to necessary site improvements, including parking lot replacement, a detention basin, and landscaping. The FY 2006 CDBG program augmented these funds with an additional \$122,910. Construction was completed in the fall of 2007. In 2009, Canton used \$45,000 in FY 2008 CDBG project funds for landscaping improvements. In 2010, Canton allocated \$20,000 to repair the floor and \$30,000 to create a new ADA compliant playground for the children.

Faith-Based Organizations. A successful leveraging of CDBG funds and a partnering with a faith-based organization occurred with the partnership of Charisma Life Christian Churches. The church is utilizing office space in our Human Service Center.

Canton's Volunteer Coordinator is instrumental in recruiting volunteers for the program. For the 2015 program, she recruited more than 6,000 volunteers that contributed 20,000 hours of service. Volunteers are also recruited each month for TEFAP (The Emergency Food Assistance Program). This is a monthly supplemental food program for low income families in Canton. Throughout the year, 13 volunteers packaged and distributed food for needy families in the area. There are 71 registered households in TEFAP in Canton. Approximately 70 households or 113 people receive a distribution each month. In addition, the volunteer coordinator recruited volunteers to assist at Canton Place and Walton Wood Senior Living Center for their Focus Hope program.

State Funds. Canton leverages its own funds and MDOT/SMART Municipal Credit funds for the Canton Community Mobility Transportation Services program. In 2015, Canton received \$88,692 in Municipal Credits, to which Canton contributed its own and miscellaneous funds for a budget total of \$411,642. The program provides van service for the disabled and seniors to local Wayne County destinations as well as medical facilities in Washtenaw County. The charge is \$2 for a local destination, \$3 for a Wayne County destination, and \$5 for a Washtenaw County destination. The fare is for one way. The program operates 8 a.m. to 5 p.m. Monday through Friday.

## **Managing the Process**

1. Describe actions taken during the last year to ensure compliance with program and comprehensive planning requirements.

Program Year 5 CAPER Managing the Process response:

Canton's Financial Analyst, located in the Finance Department, is the lead agent for the development of the 5 Year Consolidated Plan, Annual Action Plans, CAPER and the Assessment of Fair Housing. The Financial Analyst is responsible for the general administration of the CDBG and NSP programs. The employee works closely with the Community Development Block Grant Advisory Council and the elected Board of Trustees to ensure the goals and objectives are carried out.

In the fall of 2015, Canton contracted with Wade Trim to perform and prepare Canton's Consolidated Plan and Assessment of Fair Housing (2016-2020). The 5 Year Consolidated Plan (2016-2020) was approved by HUD on August 22<sup>nd</sup> and the Assessment of Fair Housing is being reviewed as Canton is one of the first to submit the new Assessment of Fair Housing requirement.

## **Citizen Participation**

1. Provide a summary of citizen comments.
2. In addition, the performance report provided to citizens must identify the Federal funds made available for furthering the objectives of the Consolidated Plan. For each formula grant program, the grantee shall identify the total amount of funds available (including estimated program income), the total amount of funds committed during the reporting period, the total amount expended during the reporting period, and the geographic distribution and location of expenditures. Jurisdictions are encouraged to include maps in describing the geographic distribution and location of investment (including areas of minority concentration). The geographic distribution and expenditure requirement may also be satisfied by specifying the census tracts where expenditures were concentrated.

Program Year 5 CAPER Citizen Participation response:

The draft CAPER was released for public comment on September 1, 2016, and was made available online. The public hearing took place on September 28<sup>th</sup>. The legal notices were published on our website, the local paper, and our township administration building message board(s). No comments were received.

## **Institutional Structure**

1. Describe actions taken during the last year to overcome gaps in institutional structures and enhance coordination.

Program Year 5 CAPER Institutional Structure response:

Program Year 2015 is the 5<sup>th</sup> and final year of the 2011-2015 Consolidated Plan. Canton was required to submit its new Consolidated Plan and Assessment of Fair Housing by spring of 2016. With just one employee running the CDBG program, Canton knew it had to hire an expert to guide us through all of the new federal regulations. Canton issued a Request for Proposal for this service in the fall of 2015 and received an offer from Wade Trim. Wade Trim was hired and our first public meeting was held on September 9, 2015. Wade Trim helped us with all of the new IDIS on-line data submission requirements as well as holding all of the required public hearings. Our Consolidated Plan was approved on August 22, 2015.

## **Monitoring**

1. Describe how and the frequency with which you monitored your activities.
2. Describe the results of your monitoring including any improvements.



3. Self Evaluation
  - a. Describe the effect programs have in solving neighborhood and community problems.
  - b. Describe progress in meeting priority needs and specific objectives and help make community's vision of the future a reality.
  - c. Describe how you provided decent housing and a suitable living environment and expanded economic opportunity principally for low and moderate-income persons.
  - d. Indicate any activities falling behind schedule.
  - e. Describe how activities and strategies made an impact on identified needs.
  - f. Identify indicators that would best describe the results.
  - g. Identify barriers that had a negative impact on fulfilling the strategies and overall vision.
  - h. Identify whether major goals are on target and discuss reasons for those that are not on target.
  - i. Identify any adjustments or improvements to strategies and activities that might meet your needs more effectively.

Program Year 5 CAPER Monitoring response:

Canton Township reviews each and every activity annually. With only a small allocation each year, \$300,000, Canton Township typically has less than 10 activities each year. Every activity is reviewed to verify that it meets (1) National Objective, (2) Eligible Activity and (3) 5 Year Consolidated Plan goal. A printout of the 2015 activities is provided. Canton has adopted a set of goals and priorities to meet the needs of the community and is dedicated to meeting them. Canton will provide certifications to all projects that meet a priority item identified in the Consolidated Plan. Each year Canton sends out a Notice of Funding/Request for Proposal (RFP) for professional services that meet the goals and priorities of our Consolidated Plan. These proposals are sent out electronically to all vendors including minority businesses. Canton reaches out to the Detroit NAACP, Michigan Minority Supplier Dev Council and the National Association of Women Business Owners, to name a few. We also send all of our bids for "brick and mortar" projects to these organizations. Every year our 4 sub recipients are monitored. With such a small allocation of \$15,000, and straight forward activities, these are not given a high-risk designation. In regards to Canton Township run activities, each activity is reviewed quarterly to make sure we are staying on track and reviewed against our timeliness ratio.

During the reporting period the use of CDBG funds remained consistent with the Consolidated Plan. The Consolidated Plan identifies the objectives and priorities of assisting low and moderate income persons. Each and every year Canton Township writes up the project descriptions. Each Activity must fall under an eligible activity, a National Objective and one of Canton Township's Consolidated Plan goals. The list of projects and 7 goals for the program are provided. An example of a project is our Housing rehabilitation program. In 2015 Canton budgeted \$125,000 to help repair/rehab homes or mobile homes. Another objective and priority is the indirect assistance to low and moderate income tenants and homeowners through the funding of local human service agencies. Agency records reflect that typically more service seekers come from renters than from homeowners. Canton annually budgets 15% of its CDBG allocation to four local human service providers which have long-standing and non-overlapping programs within the CDBG program. This strategy was maintained in PY 2015. Agency spending and client numbers were consistent with previous years.



Housing preservation is addressed through the housing rehabilitation program. The non-demolition of housing strategy was followed during the reporting period. Canton has committed to support applications by third parties to establish affordable housing; however there was no such application during PY 2015.

There is no change in the CDBG program objectives, since they remain consistent and achievable.

Canton is carrying out the actions described in its action plan. The annual plan is reviewed by HUD and supported by local actions as evidenced in financial draws and records keeping. The program is audited annually by Plante & Moran and every three years by HUD. HUD representatives monitored the program in May of 2014. HUD representatives monitored the program again in May of 2015. The only source of project funding during the reporting period is the CDBG program and these funds are used as publicly stated. No support by other entities was requested during the reporting period. No willful action was taken to hinder Consolidated Plan implementation.

Canton's CDBG funds are used exclusively for the three national objectives. No deviation from these policies was proposed or contemplated during PY 2015.

No activities that involved the acquisition or demolition of occupied real property occurred during the reporting period, and none is contemplated.

No economic development activities were undertaken during the reporting period. No program income was earned during the reporting period.

Sub recipients are audited yearly and all invoices are carefully reviewed.

Two activities have fallen behind schedule. Our "ADA Improvements" and "Historical Building Renovation" have had contractor difficulties. Both projects are a go for this fall and will be completed before 2017.

## **Lead-based Paint**

1. Describe actions taken during the last year to evaluate and reduce lead-based paint hazards.

Program Year 5 CAPER Lead-based Paint response:

The control of lead-based paint is addressed through the housing rehabilitation program. Each home built before 1978, is inspected by a certified Lead Abatement Contractor. The preliminary lead contamination evaluation is in every case file and followed by formal testing and assessment by a certified lead testing firm. The building inspector can also be consulted whenever a lead-based paint question arises whether or not related to the housing rehabilitation program. Based on his assessment the problem can be referred back to the housing rehabilitation program or to the appropriate agency, such as the County health department. As a regular policy, every housing rehab applicant built before 1978 undergoes a lead based paint assessment conducted by a certified testing firm.

## HOUSING

### Housing Needs

\*Please also refer to the Housing Needs Table in the Needs.xls workbook.

1. Describe Actions taken during the last year to foster and maintain affordable housing.

Program Year 5 CAPER Housing Needs response:

Canton's only affordable housing resource under HUD is the Community Development Block Grant program. Because of its small annual allocation, Canton has limited CDBG funds to devote towards housing rehabilitation, the only program which provides direct benefits to low and moderate income residents.

Housing Rehabilitation. Low and moderate income homeowners are assisted directly through the housing rehabilitation program. Canton's housing rehabilitation program was historically small, reflecting the then modest demand for the program. Typically, two or three homes were rehabilitated each year. In PY 2006 the decision was made to increase participation in the program and it was funded at \$100,000. An additional \$76,922.17 was reprogrammed for housing rehabilitation from completed or cancelled activities. The resulting budget was the largest Canton ever devoted to the program during a single CDBG fiscal year. Canton heavily promoted housing rehabilitation in the Observer newspaper, in the monthly Township newsletter, and on cable television. As a result, during PY 2007, Canton rehabbed nine single family homes, spending more than \$122,000. The households ranged in size from one to six members, and were represented in all three low/mod income categories. In PY 2009, Canton increased its housing rehabilitation budget to \$128,875. During the reporting period Canton completed or began 9 housing rehabilitation projects, totaling more than \$97,000 in contracts. In PY 2010, Canton was able to rehab 10 homes. In PY 2011 Canton was able to rehab 11 homes. In PY 2013 we were able to rehab 13 homes and in PY2014 we were able to rehab 11 homes.

Applicants for housing rehabilitation were once from families in homes that predate the 1960's housing boom and hence lived in much older housing and had working class jobs and backgrounds. Now, however, most applications come from families whose financial situations have changed through job loss or salary reduction, divorce, single parenthood, or retirement. Increasingly, applications are for repairs to housing built in the 1970s. Because a qualified program applicant can now come from either "old" or "new" Canton, the Township no longer enforces geographic limits on its housing rehabilitation program. As noted in the 2001 CAPER, in specific response to HUD suggestions, Canton has made two changes to the housing rehabilitation program. First, mobile homes have been added to the program. Canton will now repair mobile homes for project costs up to \$5,000, with no lien. Canton decided to forego the lien because of the low resale value of mobile homes. The trade-off is the \$5,000 ceiling on repairs. The second change is the advertising in our monthly newsletter. Canton began promoting the program in the monthly community newsletter, Focus. The Focus is mailed to 34,000 Canton addresses. Advertising in the Focus has resulted in revitalized interest in the program.

In Program Year 2015, Canton performed housing rehab on 4 homes. In previous years, we had larger numbers because we were able to rehab mobile homes. Unfortunately, last year, we didn't aid as many homeowners as we would have liked to. We had a few homeowners who decided not to proceed after we had written up the specs and were about to publish bids for the work. Many man hours were lost. We also had a problem with a contractor. This contractor performed sub-standard work and closed their office for months when we requested the work to be redone. We were forced to send legal notices in order to finally communicate with them. Another contractor had to be hired to complete the unfinished work.

Budget for PY 2015 was \$125,000; Spent: \$73,363

Proposed: 15

Accomplishments: 4 households served.

Race: White: 4 persons; African American Black: 0 persons; African American/Black and White: 0; American Indian/Alaskan Native: 0, American Indian/Alaskan Native and African American/Black: 0; American Indian/Alaskan Native and White: 0; Asian: 0; Asian and White: 0; Native Hawaiian/Pacific Islander: 0; Unknown: 0; Other Multi-Racial: 0

Income: Extremely Low: 0 household; Very Low: 1 households; Low: 3 household

### Specific Housing Objectives

1. Evaluate progress in meeting specific objective of providing affordable housing, including the number of extremely low-income, low-income, and moderate-income renter and owner households comparing actual accomplishments with proposed goals during the reporting period.

Under the Housing Act of 1937, Canton Township does not qualify for public housing and is limited in our resources. We do however provide housing rehabilitation loans to income qualified persons. In PY 2015, Canton budgeted \$125,000 to help assist low income persons rehabilitate their homes. Our goal was to use this money to assist 15 homes. We were able to spend \$73,363 and rehabilitate 4 homes. These rehabilitation loans are forgivable loans once the affordability period has passed. Canton Township places a Lien on the property. This ensures that the housing assistance will remain for low income persons or we will recapture the investment made in the home and use that money for other income qualified residents. Canton was able to help: 0 Extremely Low households; 1 Very Low households; 3 Low households

2. Evaluate progress in providing affordable housing that meets the Section 215 definition of affordable housing for rental and owner households comparing actual accomplishments with proposed goals during the reporting period.

Under the Housing Act of 1937, Canton Township does not qualify for public housing and is limited in our resources. Since we do not receive funding for public housing, Canton uses its allocation to provide homeownership assistance (section b. Homeownership) Under Section 215 qualification states that housing that is for

ownership will qualify if the housing is (3. B) "recapture the investment provided under this subchapter in order to assist other persons...."

Canton meets this requirement by placing Liens on the property for the affordability period. Homeowners who qualify must pay back their loans if they sell the property. This guarantees that the money used will aid low-income persons. Our goal in 2015 was to rehabilitate 15 homes. We were able to rehabilitate 3 homes.

3. Describe efforts to address "worst-case" housing needs and housing needs of persons with disabilities.

"Worst Case Housing Needs" are met through a couple of programs. First, our Housing Rehabilitation Program is run on a first come first serve basis unless the person has a disability. If the person has a disability, their application is given top priority. In PY 2013, an application was received from a family requiring assistance. The homeowner was unable to climb stairs after an accident and reached out to Canton Township for assistance. After the homeowner met all HUD requirements, we were able to purchase and install an Acorn Stair lift in the home which allowed the homeowner to move throughout their home. Also in 2012, we received a request to assist a homebound person that was unable to leave their mobile home. The only time they left the home was for Doctor's appointments, which required a call to 911 to help assist them down the stairs. Unfortunately, they passed away before we could assist them. After our fire department brought a second homeowner request (wheelchair ramp) to our attention, we began discussing how we could help these people. We now we have in place a program to assist handicapped persons with wheelchair ramp purchase and installation.

Our second program for "worst case needs" is for the homeless shelter program *First Step*. Canton Township provides financial assistance to *First Step*, which is a domestic violence shelter program. Women and their children fleeing domestic violence are provided a safe place to stay. Canton provided \$15,000 last year.

Finally, we provide emergency rent assistance. Canton residents who need assistance and qualify can receive up to three months rent. This money can help them catch up on financial issues and allow them to stay in their apartment. Canton provided \$15,000 last year.

## **Public Housing Strategy**

1. Describe actions taken during the last year to improve public housing and resident initiatives.

Program Year 5 CAPER Public Housing Strategy response:

Under the Housing Act of 1937, Canton Township does not qualify for public housing.

## **Barriers to Affordable Housing**

1. Describe actions taken during the last year to eliminate barriers to affordable housing.

Program Year 5 CAPER Barriers to Affordable Housing response:

The Consolidated Plan and PY 2015 Action Plan detailed Canton's # 1 Priority, "To Increase homeownership Rehabilitation Opportunities for low and moderate income households." With our limited appropriation, Canton continually strives to repair and rehab older homes and mobile homes in the community. The major barrier to affordable housing in Canton is land values, which have risen markedly throughout the Township in recent years, and remain high even in the housing recession. Canton experienced a 15 year residential building boom, which has driven the cost of the land to \$50,000 for a single family residential lot. The most affected area presently is southern Canton and the Michigan Avenue corridor. With the saturation development of the Ford Road corridor, Michigan Avenue, which includes the I-275 interchange, has become the "hot" real estate market in Canton. Although the Michigan Avenue corridor is not zoned or master planned for residential development, rising land prices have impacted residentially zoned land north of the corridor and rendered affordable housing development impracticable. Throughout Canton, expensive homes yield the highest profit margins-- and are salable. Canton is now a nominal player in land acquisition (especially for parkland) since it is routinely bested in land purchase attempts by well-heeled developers. With the recent downturn in the economy, land costs have begun to moderate although not greatly affecting prices of residential properties

### **HOME/ American Dream Down Payment Initiative (ADDI)**

1. Assessment of Relationship of HOME Funds to Goals and Objectives
  - a. Evaluate progress made toward meeting goals for providing affordable housing using HOME funds, including the number and types of households served.
2. HOME Match Report
  - a. Use HOME Match Report HUD-40107-A to report on match contributions for the period covered by the Consolidated Plan program year.
3. HOME MBE and WBE Report
  - a. Use Part III of HUD Form 40107 to report contracts and subcontracts with Minority Business Enterprises (MBEs) and Women's Business Enterprises (WBEs).
4. Assessments
  - a. Detail results of on-site inspections of rental housing.
  - b. Describe the HOME jurisdiction's affirmative marketing actions.
  - c. Describe outreach to minority and women owned businesses.

Program Year 5 CAPER HOME/ADDI response:

Under the HOME Investment Partnership Act of 2003, Canton Township does not qualify for funding.

## HOMELESS

### Homeless Needs

\*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

1. Identify actions taken to address needs of homeless persons.
2. Identify actions to help homeless persons make the transition to permanent housing and independent living.
3. Identify new Federal resources obtained from Homeless SuperNOFA.

Program Year 5 CAPER Homeless Needs response:

Canton Township is served by a Continuum of Care as represented by the Out Wayne County Homeless Service Coalition. More than 60 agencies, organizations, and governmental units participated in the initial 1996 strategy development process. Since then this group has established collective goals, gathered information and data, and formed the framework for the Continuum of Care model for the Out Wayne County area. A Steering Committee and eight Coalition Committees have led this group with a unified vision and dedication toward ending homelessness. Committee work of the coalition is focused on addressing the goals of the Out Wayne Homeless Services Coalition 10 Year Plan to End Homelessness. Fundraising and innovative program designs have brought forth programs and services that address gaps found within Wayne County. The Out Wayne County Homeless Services Coalition is a member of Region 8, along with Continuum of Care bodies from the City of Detroit, Oakland County, Macomb County, and Monroe County. A Regional representative from each Continuum regularly participates as a member of the Regional Council as a means for collaboration, sharing best practices, communicating to solve problems, and requesting and using state and federal resources efficiently and effectively to reach their ultimate goal – ending homelessness.

In 2009, Out Wayne County Homeless Services conducted a Point in Time Community Homeless Count. Of the 476 homeless persons interviewed and counted, only 3 persons gave a Canton zip code of 48187 or 48188 as their former residence.

### Specific Homeless Prevention Elements

1. Identify actions taken to prevent homelessness.

Program Year 5 CAPER Specific Housing Prevention Elements response:

Wayne-Metropolitan Community Action Agency now provides emergency rent and mortgage assistance to qualifying individuals or families. The program, limited to three months assistance, is for households facing a short-term financial crisis; they must demonstrate an ability to resume payments on their own after the three month period. Ten people benefited from the program in PY 2015. Ten female heads of households were aided with this program

## Emergency Shelter Grants (ESG)

1. Identify actions to address emergency shelter and transitional housing needs of homeless individuals and families (including significant subpopulations such as those living on the streets).
2. Assessment of Relationship of ESG Funds to Goals and Objectives
  - a. Evaluate progress made in using ESG funds to address homeless and homeless prevention needs, goals, and specific objectives established in the Consolidated Plan.
  - b. Detail how ESG projects are related to implementation of comprehensive homeless planning strategy, including the number and types of individuals and persons in households served with ESG funds.
3. Matching Resources
  - a. Provide specific sources and amounts of new funding used to meet match as required by 42 USC 11375(a)(1), including cash resources, grants, and staff salaries, as well as in-kind contributions such as the value of a building or lease, donated materials, or volunteer time.
4. State Method of Distribution
  - a. States must describe their method of distribution and how it rated and selected its local government agencies and private nonprofit organizations acting as subrecipients.
5. Activity and Beneficiary Data
  - a. Completion of attached Emergency Shelter Grant Program Performance Chart or other reports showing ESGP expenditures by type of activity. Also describe any problems in collecting, reporting, and evaluating the reliability of this information.
  - b. Homeless Discharge Coordination
    - i. As part of the government developing and implementing a homeless discharge coordination policy, ESG homeless prevention funds may be used to assist very-low income individuals and families at risk of becoming homeless after being released from publicly funded institutions such as health care facilities, foster care or other youth facilities, or corrections institutions or programs.
  - c. Explain how your government is instituting a homeless discharge coordination policy, and how ESG homeless prevention funds are being used in this effort.

Program Year 5 CAPER ESG response:

Under the Emergency Shelter Grants (ESG) program, Canton Township does not qualify for funding

## COMMUNITY DEVELOPMENT

### Community Development

\*Please also refer to the Community Development Table in the Needs.xls workbook.

1. Assessment of Relationship of CDBG Funds to Goals and Objectives



- a. Assess use of CDBG funds in relation to the priorities, needs, goals, and specific objectives in the Consolidated Plan, particularly the highest priority activities.

**Priority 1:** *“To Increase homeownership rehabilitation opportunities for low- and moderate-income households.”*

Canton’s primary strategy to preserve the affordable housing stock is through its housing rehabilitation program. The choice of housing rehabilitation is dictated by Canton’s relatively small entitlement, making large-scale housing programs or projects impractical, as well as the overall health of the housing stock. Most homes were built after the late 1960’s. Homes built earlier are few and scattered, making a concerted or geographically focused housing preservation program unworkable. Also, because of the wealth of the community, an older home does not automatically signal a low or moderate-income family. The housing rehabilitation program was fully funded in PY 2015. Most homes being rehabilitated are in the older subdivisions. Mobile homes are now eligible for emergency or limited repairs.

**Priority 2:** *“To Increase homeownership opportunities for low- and moderate- income households.”*

In 2009, Canton partnered with Wayne Metropolitan Community Action Agency to run our Neighborhood Stabilization Program. As part of the program potential homebuyers must go through an 8 hour homebuyer education class. Wayne Metro is Canton’s homeless interventionist. If people need rental assistance, they can contact Wayne Metro for help. We are hoping to provide these mandatory NSP classes to new potential homebuyers and fund it through the CDBG program.

**Priority 3:** *“To improve the quality, management and supply of existing rental property available to low- and moderate- income households.”*

In the fall of 2014, Canton recognized the need for a registration and inspection program for residential rental units within the Township for the health and safety of its residents and to provide an efficient system for compelling landlords to correct violations and to maintain, in proper condition, rental property within the Township. Canton Township recognizes that the most efficient system to provide for residential rental housing inspections is the creation of a program requiring the registration and inspection of all residential rental housing units within the Township, so that effective and regularly scheduled inspections can be performed by designated Township Building Code Officials.

Although Canton does not have public housing or a housing commission, it maintains close ties to the Plymouth Housing Commission. The Livonia Housing Commission, under contract with HUD, administers the Section 8 Housing Choice (Opt-out) Vouchers on behalf of residents at Canterbury Mews Cooperatives. The Westland Housing Commission, beginning in 2004, administers 263 Section 8 housing vouchers.

- b. Evaluate progress made toward meeting goals for providing affordable housing using CDBG funds, including the number and types of households served.

## Housing Rehabilitation

Budget for PY 2015 was \$ 125,000 Spent: \$ 73,363

Proposed: 15

Accomplishments: 4 households served.

Race: White: 4 persons; African American Black: 0 persons; African American/Black and White: 0; American Indian/Alaskan Native: 0, American Indian/Alaskan Native and African American/Black: 0; American Indian/Alaskan Native and White: 0; Asian: 0; Asian and White: 0; Native Hawaiian/Pacific Islander: 0; Unknown: 0; Other Multi-Racial: 0

Income: Extremely Low: 0 household; Very Low: 1 households; Low: 3 household

Accomplishments: 4 households served. Costs vary from house to house. Mobile home repairs cap at \$5000 where homes can go up to \$25,000.

c. Indicate the extent to which CDBG funds were used for activities that benefited extremely low-income, low-income, and moderate-income persons.

### **First Step – Service provider to victims of domestic abuse and sexual assault**

Proposed: 200 persons

Budget: PY 2015: \$ 15,000; Spent \$15,000 Accomplishments: 364 persons served.

Race: White: 186; Black /African American: 57; Asian: 11; American Indian/Alaskan Native & White: 1; Native Hawaiian: 11; American Indian/Alaskan Native: 3; Other Multi Racial: 95

Hispanic/Latino: 3

Income: Ext Low: 92; Very Low: 17; Moderate: 226; Non –Low Moderate: 29

### **Wayne Metro Community Action Agency – Homeless Intervention.**

Proposed: 6

Budget: PY 2014: \$ 15,000; Spent \$13,336 Accomplishments: 10 served

Race: White: 4; Black /African American: 6;

Hispanic/Latino: 0

Income: Extremely Low: 6; Very Low: 3; Low: 1; Above 80%: 0

Female Head of Household: 10

### **Neighborhood Legal Services – Legal presentations & services to low income seniors and caregivers.**

Proposed: 75 persons  
Budget: PY 2015: \$ 13,000; Spent \$ 13,000 Accomplishments: 68 persons served

Race: White: 51; Black /African American: 12; Asian: 5;  
Hispanic/Latino: 2  
Income: Extremely Low: 29; Low: 25; Moderate: 14; Non-Low Moderate: 0;

**Growth Works – Service provider for community support programs. Drug and alcohol prevention and counseling**

Proposed: 90 persons  
Budget: PY 2015: \$ 1,500; Spent \$440 Accomplishments: 34 persons served.

Race: White: 23; Black /African American: 7; Asian: 2; Other Multi Racial: 2  
Hispanic/Latino: 0  
Income: Ext Low: 18; Very Low: 4; Moderate: 7; Non –Low Moderate: 5

**Summit Scholarships –Allows Income eligible residents to participate in programs offered at the community center.**

Proposed: 10  
Budget: PY 2015: \$ 1,500; Spent \$ 1,500 Accomplishments: 14 Individuals were able to participate in activities offered at the community center.

Race: White: 5; Asian: 4; Black /African American: 9  
Hispanic/Latino: 0  
Income: Extremely Low: 9; Very Low: 2; Low: 3;

**Tutoring Services – professional academic tutoring services for income eligible at risk youth ages 11-17.**

Proposed: 10 persons  
Budget: PY 2015: \$ 3,615; Spent \$2,136.25 Accomplishments: 5 persons served.

Race: Black /African American: 5  
Hispanic/Latino: 0  
Income: Ext Low: 5; Very Low: 0; Moderate: 0; Non –Low Moderate: 0

Other PY 2015 Activities:

**ADA Improvements – Upgrading and retrofitting public facilities to meet ADA requirements.**

Budget: PY 2015: \$ 65,000; Spent \$ 0 Accomplishments: 1 building will be updated.

One Environmental Assessment has been completed this year. Bids have been published and received. Work will commence this fall.

**Building Rehabilitation & Preservation – Major repairs to preserve a historic building.**

Budget: PY 2015: \$ 75,000; Spent \$ 0 Accomplishments: 1 building will be updated.

The Environmental Assessment has been completed. Not all of the work will be funded with CDBG funds, just a small portion. Once the major construction has been done, CDBG funds will be used for the fire suppression system, electrical, plumbing and elevator. Work will commence this fall.

2. Changes in Program Objectives
  - a. Identify the nature of and the reasons for any changes in program objectives and how the jurisdiction would change its program as a result of its experiences.

No Changes were made.

3. Assessment of Efforts in Carrying Out Planned Actions
  - a. Indicate how grantee pursued all resources indicated in the Consolidated Plan.

The Financial Analyst (lead agent) and the person responsible for the administration of the CDBG and NSP programs worked with local non-profit agencies and Canton departments to identify additional funding sources to address all of Canton's goals and priorities. The financial analyst met with a local non-profit, Partnership of the Arts, to see if we could collaborate on a project. The financial analyst is available to aid all the non-profits with technical assistance

- b. Indicate how grantee provided certifications of consistency in a fair and impartial manner.

Canton Township has adopted a set of goals and priorities to meet the needs of the community and is dedicated to meeting them. Canton will provide certifications to all projects that meet a priority item identified in the Consolidated Plan. Each year Canton sends out a Notice of Funding /RFP for professional services that meet the goals and priorities of our Consolidated Plan. These proposals are submitted in a sealed envelope and given to the CDBG Advisory Council for their review.

Certifications Provided in 2015:

- First Step
- Neighborhood Legal Services of Michigan
- Wayne Metro Community Action Agency
- Growth Works
- Tutoring Services
- Summit Scholarships
- Housing Rehabilitation
- ADA Improvements

- c. Indicate how grantee did not hinder Consolidated Plan implementation by action or willful inaction.

The Financial Analyst and CDBG Advisory Council members actively seek agencies to address priority issues and gaps in services throughout the entire year. The Financial Analyst provides technical assistance to any agency seeking to provide needed services in the community, with priority given to high priority issues. Canton provides Certifications of Consistency and Local Governing Body approvals for all projects seeking funding that meet priority needs of the community

4. For Funds Not Used for National Objectives
  - a. Indicate how use of CDBG funds did not meet national objectives.
  - b. Indicate how did not comply with overall benefit certification.

**All funds were used to meet National Objectives**

5. Anti-displacement and Relocation – for activities that involve acquisition, rehabilitation or demolition of occupied real property
  - a. Describe steps actually taken to minimize the amount of displacement resulting from the CDBG-assisted activities.
  - b. Describe steps taken to identify households, businesses, farms or nonprofit organizations who occupied properties subject to the Uniform Relocation Act or Section 104(d) of the Housing and Community Development Act of 1974, as amended, and whether or not they were displaced, and the nature of their needs and preferences.
  - c. Describe steps taken to ensure the timely issuance of information notices to displaced households, businesses, farms, or nonprofit organizations.

It is Canton Township’s intent to cause no displacement to persons receiving assistance through the CDBG program. However, Canton recognizes that situations may arise wherein displacement or relocation is the only feasible method of providing assistance. The only program that would involve relocation or displacement was the Housing rehab program. If lead based paint was found, homeowners are required to be out of the home during remediation. Canton Township would find accommodations for those homeowners.

6. Low/Mod Job Activities – for economic development activities undertaken where jobs were made available but not taken by low- or moderate-income persons
  - a. Describe actions taken by grantee and businesses to ensure first consideration was or will be given to low/mod persons.
  - b. List by job title of all the permanent jobs created/retained and those that were made available to low/mod persons.
  - c. If any of jobs claimed as being available to low/mod persons require special skill, work experience, or education, provide a description of steps being taken or that will be taken to provide such skills, experience, or education.

**No Economic Activities were undertaken**

7. Low/Mod Limited Clientele Activities – for activities not falling within one of the categories of presumed limited clientele low and moderate income benefit
  - a. Describe how the nature, location, or other information demonstrates the activities benefit a limited clientele at least 51% of whom are low- and moderate-income.

## All of the above mentioned programs were Low/Mod Clientele Activities

8. Program income received
  - a. Detail the amount of program income reported that was returned to each individual revolving fund, e.g., housing rehabilitation, economic development, or other type of revolving fund.
  - b. Detail the amount repaid on each float-funded activity.
  - c. Detail all other loan repayments broken down by the categories of housing rehabilitation, economic development, or other.
  - d. Detail the amount of income received from the sale of property by parcel.

## No program income received

9. Prior period adjustments – where reimbursement was made this reporting period for expenditures (made in previous reporting periods) that have been disallowed, provide the following information:
  - a. The activity name and number as shown in IDIS;
  - b. The program year(s) in which the expenditure(s) for the disallowed activity(ies) was reported;
  - c. The amount returned to line-of-credit or program account; and
  - d. Total amount to be reimbursed and the time period over which the reimbursement is to be made, if the reimbursement is made with multi-year payments.

## No Prior period adjustments that have been disallowed.

10. Loans and other receivables
  - a. List the principal balance for each float-funded activity outstanding as of the end of the reporting period and the date(s) by which the funds are expected to be received.
  - b. List the total number of other loans outstanding and the principal balance owed as of the end of the reporting period.
  - c. List separately the total number of outstanding loans that are deferred or forgivable, the principal balance owed as of the end of the reporting period, and the terms of the deferral or forgiveness.
  - d. Detail the total number and amount of loans made with CDBG funds that have gone into default and for which the balance was forgiven or written off during the reporting period.
  - e. Provide a List of the parcels of property owned by the grantee or its subrecipients that have been acquired or improved using CDBG funds and that are available for sale as of the end of the reporting period.

## No loans or other receivables

11. Lump sum agreements
  - a. Provide the name of the financial institution.
  - b. Provide the date the funds were deposited.
  - c. Provide the date the use of funds commenced.
  - d. Provide the percentage of funds disbursed within 180 days of deposit in the institution.

## No Lump sum agreements

12. Housing Rehabilitation – for each type of rehabilitation program for which projects/units were reported as completed during the program year
  - a. Identify the type of program and number of projects/units completed for each program.
  - b. Provide the total CDBG funds involved in the program.
  - c. Detail other public and private funds involved in the project.

### Housing Rehabilitation

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Proposed: 15

Accomplishments: 4 households served.

Race: White: 4 persons; African American Black: 0 persons; African American/Black and White: 0; American Indian/Alaskan Native: 0; American Indian/Alaskan Native and African American/Black: 0; American Indian/Alaskan Native and White: 0; Asian: 0; Asian and White: 0; Native Hawaiian/Pacific Islander: 0; Unknown: 0; Other Multi-Racial: 0

Income: Extremely Low: 0 household; Very Low: 1 households; Low: 3 household

13. Neighborhood Revitalization Strategies – for grantees that have HUD-approved neighborhood revitalization strategies
  - a. Describe progress against benchmarks for the program year. For grantees with Federally-designated EZs or ECs that received HUD approval for a neighborhood revitalization strategy, reports that are required as part of the EZ/EC process shall suffice for purposes of reporting progress.

**Canton does not have a Neighborhood Revitalization Strategy, EZs or ECs.**

### **Antipoverty Strategy**

1. Describe actions taken during the last year to reduce the number of persons living below the poverty level.

Program Year 5 CAPER Antipoverty Strategy response:

Canton Township has analyzed the existence of poverty, and selected a number of public/private partnerships to address the housing and community development needs of its low- and moderate- income citizens. Canton will continue to operate its single family housing rehabilitation program, and work with landlords, developers, and nonprofit agencies to enhance rental and owner-occupied housing. Canton Township has used CDBG monies to construct the Human Services Center, where agencies and clients can come together to receive information, assistance, and



referrals. Canton will continue to work toward having State, County, and local providers coordinate centralized resources from this facility. Starfish Family Services (SFS), headquartered in Inkster, MI, is a nonprofit agency serving vulnerable children and families in metro Detroit. SFS reports declares that an indicator of economic stress in a community is the percentage of students eligible for the Free and Reduced Lunch program. Here are the stats for the 2014-2015 School Districts:

Detroit 73%; Taylor 73%; Dearborn 69%; Wayne-Westland 64%; Garden City 52% Romulus 72%; Plymouth -Canton 16%

Canton will continue to fund the maximum (15% of its CDBG allocation) for Public Service programs. The community supports a broad range of services, including those dealing with homelessness, elderly, youth, and the low-and moderate- income population. Canton has used this strategy for a number of years and the effectiveness can be demonstrated with its median income level, low poverty statistics, and population growth.

## NON-HOMELESS SPECIAL NEEDS

### Non-homeless Special Needs

\*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

1. Identify actions taken to address special needs of persons that are not homeless but require supportive housing, (including persons with HIV/AIDS and their families).

Program Year 5 CAPER Non-homeless Special Needs response:

Canton's non-homeless special needs activity in PY 2015 focused on helping the disabled and elderly. Canton stresses improvements to public buildings and facilities.

### Specific HOPWA Objectives

\*Please also refer to the HOPWA Table in the Needs.xls workbook.

1. Overall Assessment of Relationship of HOPWA Funds to Goals and Objectives  
Grantees should demonstrate through the CAPER and related IDIS reports the progress they are making at accomplishing identified goals and objectives with HOPWA funding. Grantees should demonstrate:
  - a. That progress is being made toward meeting the HOPWA goal for providing affordable housing using HOPWA funds and other resources for persons with HIV/AIDS and their families through a comprehensive community plan;
  - b. That community-wide HIV/AIDS housing strategies are meeting HUD's national goal of increasing the availability of decent, safe, and affordable housing for low-income persons living with HIV/AIDS;
  - c. That community partnerships between State and local governments and community-based non-profits are creating models and innovative strategies to serve the housing and related supportive service needs of persons living with HIV/AIDS and their families;
  - d. That through community-wide strategies Federal, State, local, and other resources are matched with HOPWA funding to create comprehensive housing strategies;

- e. That community strategies produce and support actual units of housing for persons living with HIV/AIDS; and finally,
  - f. That community strategies identify and supply related supportive services in conjunction with housing to ensure the needs of persons living with HIV/AIDS and their families are met.
2. This should be accomplished by providing an executive summary (1-5 pages) that includes:
- a. Grantee Narrative
    - i. Grantee and Community Overview
      - (1) A brief description of your organization, the area of service, the name of each project sponsor and a broad overview of the range/type of housing activities and related services
      - (2) How grant management oversight of project sponsor activities is conducted and how project sponsors are selected
      - (3) A description of the local jurisdiction, its need, and the estimated number of persons living with HIV/AIDS
      - (4) A brief description of the planning and public consultations involved in the use of HOPWA funds including reference to any appropriate planning document or advisory body
      - (5) What other resources were used in conjunction with HOPWA funded activities, including cash resources and in-kind contributions, such as the value of services or materials provided by volunteers or by other individuals or organizations
      - (6) Collaborative efforts with related programs including coordination and planning with clients, advocates, Ryan White CARE Act planning bodies, AIDS Drug Assistance Programs, homeless assistance programs, or other efforts that assist persons living with HIV/AIDS and their families.
    - ii. Project Accomplishment Overview
      - (1) A brief summary of all housing activities broken down by three types: emergency or short-term rent, mortgage or utility payments to prevent homelessness; rental assistance; facility based housing, including development cost, operating cost for those facilities and community residences
      - (2) The number of units of housing which have been created through acquisition, rehabilitation, or new construction since 1993 with any HOPWA funds
      - (3) A brief description of any unique supportive service or other service delivery models or efforts
      - (4) Any other accomplishments recognized in your community due to the use of HOPWA funds, including any projects in developmental stages that are not operational.
    - iii. Barriers or Trends Overview
      - (1) Describe any barriers encountered, actions in response to barriers, and recommendations for program improvement
      - (2) Trends you expect your community to face in meeting the needs of persons with HIV/AIDS, and
      - (3) Any other information you feel may be important as you look at providing services to persons with HIV/AIDS in the next 5-10 years
  - b. Accomplishment Data

- i. Completion of CAPER Performance Chart 1 of Actual Performance in the provision of housing (Table II-1 to be submitted with CAPER).
- ii. Completion of CAPER Performance Chart 2 of Comparison to Planned Housing Actions (Table II-2 to be submitted with CAPER).

Program Year 5 CAPER Specific HOPWA Objectives response:

Under the HOPWA Formula Program, Canton Township does not qualify for funding.

#### OTHER NARRATIVE

Include any CAPER information that was not covered by narratives in any other section.

Program Year 5 CAPER Other Narrative response: