

Evaluation Tools
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Accountability

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HUD Goals	
A1	Increase homeownership opportunities. (1) Expand national homeownership opportunities.
A2	Increase homeownership opportunities. (2) Increase minority homeownership.
A3	Increase homeownership opportunities. (3) Make the home-buying process less complicated and less expensive.
A4	Increase homeownership opportunities. (4) Reduce predatory lending through reform, education and enforcement.
A5	Increase homeownership opportunities. (5) Help HUD-assisted renters become homeowners.
A6	Increase homeownership opportunities. (6) Keep existing homeowners from losing their homes.
B1	Promote Decent Affordable Housing. (1) Expand access to and availability of decent, affordable rental housing.
B2	Promote Decent Affordable Housing. (2) Improve the management accountability and physical quality of public and assisted housing.
B3	Promote Decent Affordable Housing. (3) Improve housing opportunities for the elderly and persons with disabilities.
B4	Promote Decent Affordable Housing. (4) Promote housing self-sufficiency.
B5	Promote Decent Affordable Housing. (5) Facilitate more effective delivery of affordable housing by reforming public housing and the Housing Choice Voucher program.
C1	Strengthen Communities. (1) Assist disaster recovery in the Gulf Coast region.
C2	Strengthen Communities. (2) Enhance sustainability of communities by expanding economic opportunities.
C3	Strengthen Communities. (3) Foster a suitable living environment in communities by improving physical conditions and quality of life.
C4	Strengthen Communities. (4) End chronic homelessness and move homeless families and individuals to permanent housing.
C5	Strengthen Communities. (5) Address housing conditions that threaten health.
D1	Ensure Equal Opportunity in Housing. (1) Ensure access to a fair and effective administrative process to investigate and resolve complaints of discrimination.
D2	Ensure Equal Opportunity in Housing. (2) Improve public awareness of rights and responsibilities under fair housing laws.
D3	Ensure Equal Opportunity in Housing. (3) Improve housing accessibility for persons with disabilities.
D4	Ensure Equal Opportunity in Housing. (4) Ensure that HUD-funded entities comply with fair housing and other civil rights laws.

HUD Priorities	
A1	Improve the knowledge of Homeowners, Homebuyers and Renters to be Aware of Discriminatory practices and their Rights and Increase Financial Literacy to Prevent Foreclosure and to Address the Needs of Households Facing Foreclosure. (1) Providing Credit Counseling and Education for Families and Individuals.
A2	Improve the knowledge of Homeowners, Homebuyers and Renters to be Aware of Discriminatory practices and their Rights and Increase Financial Literacy to Prevent Foreclosure and to Address the Needs of Households Facing Foreclosure. (2) Homebuying Information for New Homeowners.
A3	Improve the knowledge of Homeowners, Homebuyers and Renters to be Aware of Discriminatory practices and their Rights and Increase Financial Literacy to Prevent Foreclosure and to Address the Needs of Households Facing Foreclosure. (3) Rental Housing Options.
A4	Improve the knowledge of Homeowners, Homebuyers and Renters to be Aware of Discriminatory practices and their Rights and Increase Financial Literacy to Prevent Foreclosure and to Address the Needs of Households Facing Foreclosure. (4) How to File a Discrimination Complaint.
A5	Improve the knowledge of Homeowners, Homebuyers and Renters to be Aware of Discriminatory practices and their Rights and Increase Financial Literacy to Prevent Foreclosure and to Address the Needs of Households Facing Foreclosure. (5) Complying with Limited English Proficiency Requirements.
A6	Improve the knowledge of Homeowners, Homebuyers and Renters to be Aware of Discriminatory practices and their Rights and Increase Financial Literacy to Prevent Foreclosure and to Address the Needs of Households Facing Foreclosure. (6) Addressing the Needs of Homeowners, Homebuyers and Renters who are Persons with disabilities.
B1	Encouraging Accessible Design Features. (1) Visitability in new construction and substantial rehabilitation.
B2	Encouraging Accessible Design Features. (2) Universal Design.
C	Providing Full and Equal Access to Grassroots Faith-Based and Other Community Organizations in HUD Program Implementation.
D	Participation of Minority-Serving Institutions (MSIs) in HUD Programs.
E1	Ending Chronic Homelessness. (1) Creation of affordable housing units, supportive housing, and group homes.
E2	Ending Chronic Homelessness. (2) Establishment of a set-aside of units of affordable housing for the chronically homeless.
E3	Ending Chronic Homelessness. (3) Establishment of substance abuse treatment programs targeted to the homeless population.
E4	Ending Chronic Homelessness. (4) Establishment of job training programs that will provide opportunities for economic self-sufficiency.
E5	Ending Chronic Homelessness. (5) Establishment of counseling programs that assist homeless persons in finding housing, managing finances, managing anger, and building interpersonal relationships.
E6	Ending Chronic Homelessness. (6) Provision of supportive services, such as health care assistance that will permit homeless individuals to become productive members of society.
E7	Ending Chronic Homelessness. (7) Provision of service coordinators or one-stop assistance centers that will ensure that chronically homeless persons have access to a variety of social services.
F	Promoting Energy Star and Green Development.
G	Promoting Assistance to Veterans

E1	<p>Embrace High Standards of Ethics, Management, and Accountability. (1) Strategically manage human capital to increase employee satisfaction and improve HUD performance.</p>
E2	<p>Embrace High Standards of Ethics, Management, and Accountability. (2) Improve HUD's management and its internal controls to ensure program compliance and resolve audit issues.</p>
E3	<p>Embrace High Standards of Ethics, Management, and Accountability. (3) Improve accountability, service delivery, and customer service of HUD and its partners.</p>
E4	<p>Embrace High Standards of Ethics, Management, and Accountability. (4) Capitalize on modernized technology to improve the delivery of HUD's core business functions.</p>
F1	<p>Promote Participation of Faith-Based and Other Community Organizations. (1) Reduce barriers to faith-based and other community organizations' participating in HUD-sponsored programs.</p>
F2	<p>Promote Participation of Faith-Based and Other Community Organizations. (2) Conduct outreach and provide technical assistance to strengthen the capacity of faith-based and community organizations to attract partners and secure resources.</p>
F3	<p>Promote Participation of Faith-Based and Other Community Organizations. (3) Encourage partnerships between faith-based and other community organizations and HUD's grantees and subgrantees.</p>

CAMP

CAMP eLogic Model®

Column 2

PROBLEM, NEEDS, SITUATION

There is a need for investigating systematic violations of the Fair Housing Act or substantially equivalent State and local Fair Housing laws.

There is a need for enforcement of violations of the Fair Housing Act and substantially equivalent State and local Fair Housing laws.

**CAMP eLogic Model®**[Click here to allow deletion of 'New' Activities](#)**Column 3****SERVICES OR ACTIVITIES/OUTPUTS****UNITS**

Administration-Draft HUD complaints	Complaints
Casework-Allegations/Intakes received	Allegations/Intakes Received
Casework-Assess FHAA case merit	Complaints
Casework-Assist clients requesting reasonable accommodation/modification	Persons
Casework-Audits	Audits
Casework-Businesses whose business practices were analyzed	Businesses
Casework-Cases initiated under current grant	Cases
Casework-Enforcement proposals filed	Filings
Casework-Enforcement proposals filed with DOJ	Proposals
Casework-Enforcement proposals filed with HUD/FHAP agency	Proposals
Casework-Expert witnesses procured	Persons
Casework-Favorable pre-filing closings	Complaints
Casework-Monitor settlement agreements	Agreements
Casework-Monitor zoning changes	Zoning changes
Casework-Mortgage Rescue	Persons
Casework-Persons assisted-Disabled	Persons
Casework-Persons assisted-Facing Foreclosure	Persons
Casework-Persons assisted-Non-disabled	Persons
Casework-Phone assisted-Disabled	Persons
Casework-Phone assisted-Non-disabled	Persons
Casework-Site Assessments	Assessments
Casework-Surveys conducted	Surveys
Casework-Witnesses interviewed	Persons
Complaints-Complaints filed	Complaints
Complaints-Complaints filed Zoning	Complaints
Complaints-Complaints filed Zoning-Disability Issues	Complaints
Complaints-Complaints filed/referred to HUD/FHAP agency	Complaints
Complaints-Complaints filed-Mortgage rescue scams	Complaints
Complaints-Complaints investigated Zoning	Investigations
Complaints-Complaints investigated Zoning-Disability Issues	Investigations
Complaints-Complaints mediated/conciliated	Complaints
Complaints-Complaints referred to attorneys	Complaints
Complaints-Predatory lending complaints accepted for intervention/prevention	Complaints
Complaints-Rental complaints intake and/or processed	Complaints
Counseling-Counseling for complaints by immigrants	Complaints
Counseling-Counseling on discriminatory housing practices	Households
Counseling-Fair Housing Counseling	Persons
Education-Fair Housing education/training	Persons
Education-Fair Housing education/training for disabled	Persons
Education-Fair Housing law & enforcement training/education	Persons
Education-Mortgage rescue scams	Persons
Housing-Fair Housing assessments	Assessments
Legal-Accessibility tests lead to litigation	Tests
Legal-Allegations mediated	Mediations
Legal-Allegations/Intakes processed	Allegations/Intakes Processed
Legal-Attorney Referral System	Attorneys
Legal-Case meetings with attorneys	Meetings

Legal-Mediation	Mediation
Legal-Targeted investigations	Investigations
Media-Contact media when violations identified	Contacts
Outreach-Conferences/Presentations	Conferences/Presentations
Outreach-Direct mailings to underserved households	Households
Outreach-Documents translated for non-English speakers	Documents
Outreach-Mailing	Mailing
Outreach-Meetings with building trade & architectural groups	Meetings
Outreach-Meetings with local groups	Meetings
Outreach-Meetings/Workshops	Meetings/Workshops
Outreach-New publications created/published	Publications
Outreach-Non-English speakers receive translated Fair Housing materials	Persons
Outreach-Outreach & education	Persons
Outreach-Provide website	Hits to website
Outreach-PSA distributed	Media outlets
Outreach-PSAs	PSAs aired
Outreach-PSAs developed	Hours
Outreach-Publications	Publications
Outreach-Publications distributed	Publications
Outreach-Recruit student interns	Persons
Outreach-Social networking websites	Website
Outreach-Speaking engagements	Events
Outreach-Speaking engagements attendance	Persons
Outreach-Volunteer help	Persons
Partnerships-Partnerships with Fair Housing organizations	Partnerships
Partnerships-Partnerships with Fair Housing task forces & committees	Partnerships
Partnerships-Partnerships with FHAPs	Partnerships
Partnerships-Partnerships with local agencies/organizations	Partnerships
Partnerships-Partnerships with local government	Partnerships
Planning-Develop protocol for referrals	Protocols
Planning-Develop tracking for referrals	Referrals
Policy Priority-Provide financial literacy information	Households
Policy Priority-Provide information on discriminatory lending practices	Households
Research-Market research prior to testing	Hours on research
Testing-Analyze internet tests	Tests
Testing-Evaluate/Revise test methodology(s)	Tests Methodology(s)
Testing-Mortgage/Lending test conducted	Tests
Testing-Paired tests-Administered test	Tests
Testing-Phone tests conducted	Tests
Testing-Property searches for testing purposes	Properties
Testing-Recruit testers	Persons
Testing-Retest sites	Tests
Testing-Site tests conducted	Tests
Testing-Test conducted	Tests
Testing-Test sites identified	Sites
Testing-Tests re-tested	Tests
Training-Sessions/Training for non-English speakers	Sessions
Training-Staff training	Hours
Training-Train student interns	Persons
Training-Train testers	Persons
Training-Training for the public sponsored by grantee-Attendance	Persons
Training-Training for the public sponsored by grantees	Events

Training-Trainings for professionals continuing education sponsored by grantee-	Events
Training-Trainings for professionals continuing education sponsored by grantee-	Persons
Workshops-Accessibility Workshops attendance	Persons
Workshops-Accessibility Workshops conducted	Workshops
other	Other

 <p style="text-align: center;">CAMP eLogic Model®</p>	Click here to allow deletion of 'New' Outcomes
Column 5	
ACHIEVEMENT OUTCOMES GOALS AND INDICATORS	UNITS
Casework-Cases resolved	Persons
Casework-Cases resolved to benefit client	Persons
Casework-Client damages received via FHAP or litigations	Dollars
Casework-Complaints closed with advice	Complaints
Casework-Mortgage Rescue	Persons
Casework-Requests for accommodations/modification granted	Persons
Casework-Use tracking system for referrals	Referrals
Financial-Dollar value of the purchased home	Dollars
Financial-Dollar value of the rental property obtained	Dollars
Financial-Dollar value of the settlement	Dollars
Housing-Clients obtain safe affordable housing	Persons
Housing-Clients retain safe affordable housing	Persons
Housing-Housing Units opened up from discrimination	Units
Legal-Allegations mediated-Consumer Protection	Persons
Legal-Allegations mediated-Equal Credit Opportunity	Persons
Legal-Allegations mediated-Fair Housing	Persons
Legal-Attorney's fee received	Dollars
Outreach-Clients indicate use of PEI program as a result of attending meetings or presentations	Persons
Outreach-Clients indicate use of PEI program as a result of direct mailings to underserved households	Persons
Outreach-Clients indicate use of PEI program as a result of educational programs	Persons
Outreach-Clients indicate use of PEI program as a result of received publications	Persons
Planning-Develop protocol for referrals	Protocols
Policy Priority-Identified discriminatory practices	Persons
Testing-Paired test indicates denial of reasonable accommodations	Persons
Testing-Paired test indicates denial of reasonable modifications	Persons
Testing-Paired test indicates unfair treatment based upon chemical sensitivity	Persons
Testing-Paired test indicates unfair treatment based upon color	Persons
Testing-Paired test indicates unfair treatment based upon religion	Persons
Testing-Paired test indicates unfair treatment based upon sex	Persons
Testing-Paired test indicates unfair treatment to American Indians	Persons
Testing-Paired test indicates unfair treatment to Asians	Persons
Testing-Paired test indicates unfair treatment to Blacks	Persons
Testing-Paired test indicates unfair treatment to families with children	Persons
Testing-Paired test indicates unfair treatment to Hispanic	Persons
Testing-Paired test indicates unfair treatment to persons with mental disabilities	Persons
Testing-Paired test indicates unfair treatment to persons with physical disabilities	Persons
Testing-Paired test indicates unfair treatment to Whites	Persons
other	other

CAMP eLogic Model®

A. Tools For Measurement

- Bank accounts
- Construction log
- Database
- Enforcement log
- Financial aid log
- Intake log
- Interviews
- Mgt. Info. System-automated
- Mgt. Info. System-manual
- Outcome scale(s)
- Phone log
- Plans
- Pre-post tests
- Post tests
- Program specific form(s)
- Questionnaire
- Recruitment log
- Survey
- Technical assistance log
- Time sheets

B. Where Data Maintained

- Agency database
- Centralized database
- Individual case records
- Local precinct
- Public database
- School
- Specialized database
- Tax Assessor database
- Training center

C. Source of Data

- Audit report
- Business licenses
- Certificate of Occupancy
- Code violation reports
- Counseling reports
- Employment records
- Engineering reports
- Environmental reports
- Escrow accounts
- Financial reports
- GED certification/diploma
- Health records
- HMS
- Inspection results
- Lease agreements
- Legal documents
- Loan monitoring reports
- Mortgage documents
- Payment vouchers
- Permits issued
- Placements
- Progress reports
- Referrals
- Sale documents
- Site reports
- Statistics
- Tax assessments
- Testing results
- Waiting lists
- Work plan reports

D. Frequency of Collection

- Daily
- Weekly
- Monthly
- Quarterly
- Biannually
- Annually
- Upon incident

E. Processing of Data

- Computer spreadsheets
- Flat file database
- Manual tallies
- Relational database
- Statistical database

Carter-Richmond Methodology

The Management Questions developed for your program are based on the Carter-Richmond Methodology.* A description of the Carter-Richmond Methodology appears in the General Section of the NOFA.

* © The Accountable Agency – How to Evaluate the Effectiveness of Public and Private Programs,” Reginald Carter, ISBN Number 9780978724924

Evaluation Process

An evaluation process will be part of the on-going management of the program.

The following are standard requirements that HUD expects of every program manager as part of their project management.

- Comparisons will be made between projected and actual numbers for both outputs and outcomes.
- Deviations from projected outputs and outcomes will be documented and explained on space provided on the "Reporting" Tab.
- Analyze data to determine relationship of outputs to outcomes; what outputs produce which outcomes.

The reporting requirements are specified in the program specific NOFA and your funding award.

HUD Will Use The Following Management Questions To Evaluate Your Program:

Response to Management Questions

		Measure	Count/Amount
1	How many persons are you serving (unduplicated count)?	Persons	
2	Of those served, how many resulted in cases?	Cases	
3	How many cases were resolved?	Cases	
4	How many cases were litigated?	Cases	
5	How many tests show differential treatment?	Tests	
6	What is the total amount of attorney's fees received?	Dollars	
7	What is the total amount of client damages received via FHAP or litigations?	Dollars	
8	As a result of a paired test, how many persons were denied reasonable accommodations?	Persons	
9	As a result of a paired test, how many persons were denied reasonable modifications?	Persons	
10	As a result of a paired test, how many persons were denied fair treatment based upon color?	Persons	
11	As a result of a paired test, how many persons were denied fair treatment based upon religion?	Persons	
12	As a result of a paired test, how many persons were denied fair treatment based upon sex?	Persons	
13	As a result of a paired test, how many persons were denied fair treatment based upon chemical sensitivity?	Persons	
14	As a result of a paired test, how many American Indians were denied fair treatment?	Persons	
15	As a result of a paired test, how many Asians were denied fair treatment?	Persons	
16	As a result of a paired test, how many Blacks were denied fair treatment?	Persons	
17	As a result of a paired test, how many Hispanics were denied fair treatment?	Persons	
18	As a result of a paired test, how many Whites were denied fair treatment?	Persons	
19	As a result of a paired test, how many families with children were denied fair treatment?	Families	
20	As a result of a paired test, how many persons with mental disabilities were denied fair treatment?	Persons	
21	As a result of a paired test, how many persons with physical disabilities were denied fair treatment?	Persons	
22	As a result of investigation, how many persons experienced mortgage fraud or predatory foreclosure schemes?	Persons	
23	As a result of investigation, how many neighborhoods experienced high concentration of persons experiencing mortgage fraud or predatory foreclosure schemes? If this occurred, please identify the neighborhoods using zip code plus four in the fields below 23a to 23c.		
23a	Neighborhoods experienced high concentration of persons experiencing mortgage fraud or predatory foreclosure schemes.	Zip Code + 4	
23b	Neighborhoods experienced high concentration of persons experiencing mortgage fraud or predatory foreclosure schemes.	Zip Code + 4	
23c	Neighborhoods experienced high concentration of persons experiencing mortgage fraud or predatory foreclosure schemes.	Zip Code + 4	
24	How many persons experienced deceptive consumer protection practices based upon color?	Persons	
25	As a result of investigation, how many persons were found to have experienced deceptive consumer protection practices based upon color?	Persons	
26	How many persons experienced deceptive consumer protection practices based upon religion?	Persons	

27	As a result of investigation, how many persons were found to have experienced deceptive consumer protection practices based upon religion?	Persons	
28	How many persons experienced deceptive consumer protection practices based upon sex?	Persons	
29	As a result of investigation, how many persons were found to have experienced deceptive consumer protection practices based upon sex?	Persons	
30	How many persons experienced deceptive consumer protection practices based upon national origin?	Persons	
31	As a result of investigation, how many persons were found to have experienced deceptive consumer protection practices based upon national origin?	Persons	
32	How many persons experienced deceptive consumer protection practices based upon race?	Persons	
33	How many American Indians experienced deceptive consumer protection practices?	Persons	
34	As a result of investigation, how many American Indians were found to have experienced deceptive consumer protection practices?	Persons	
35	How many Asians experienced deceptive consumer protection practices?	Persons	
36	As a result of investigation, how many Asians were found to have experienced deceptive consumer protection practices?	Persons	
37	How many Blacks experienced deceptive consumer protection practices?	Persons	
38	As a result of investigation, how many Blacks were found to have experienced deceptive consumer protection practices?	Persons	
39	How many Hispanics experienced deceptive consumer protection practices?	Persons	
40	As a result of investigation, how many Hispanics were found to have experienced deceptive consumer protection practices?	Persons	
41	How many Whites experienced deceptive consumer protection practices?	Persons	
42	As a result of investigation, how many Whites were found to have experienced deceptive consumer protection practices?	Persons	
43	How many families experienced deceptive consumer protection practices?	Families	
44	As a result of investigation, how many families were found to have experienced deceptive consumer protection practices?	Families	
45	How many persons with mental disabilities experienced deceptive consumer protection practices?	Persons	
46	As a result of investigation, how many persons with mental disabilities were found to have experienced deceptive consumer protection practices?	Persons	
47	How many persons with physical disabilities experienced deceptive consumer protection practices?	Persons	
48	As a result of investigation, how many persons with physical disabilities were found to have experienced deceptive consumer protection practices?	Persons	
49	How many persons experienced violations of the Fair Housing Act based upon color?	Persons	
50	As a result of investigation, how many persons were found to have experienced violations of the Fair Housing Act based upon color?	Persons	
51	How many persons experienced violations of the Fair Housing Act based upon religion?	Persons	
52	As a result of investigation, how many persons were found to have experienced violations of the Fair Housing Act based upon religion?	Persons	
53	How many persons experienced violations of the Fair Housing Act based upon sex?	Persons	
54	As a result of investigation, how many persons were found to have experienced violations of the Fair Housing Act based upon sex?	Persons	
55	How many persons experienced violations of the Fair Housing Act based upon national origin?	Persons	
56	How many families experienced violations of the Fair Housing Act?	Families	
57	As a result of investigation, how many families were found to have experienced violations of the Fair Housing Act?	Families	
58	How many persons with mental disabilities experienced violations of the Fair Housing Act?	Persons	
59	As a result of investigation, how many persons with mental disabilities were found to have experienced violations of the Fair Housing Act?	Persons	
60	How many persons with physical disabilities experienced violations of the Fair Housing Act?	Persons	
61	As a result of investigation, how many persons with physical disabilities were found to have experienced violations of the Fair Housing Act?	Persons	
62	How many cases were resolved to the benefit of the client?	Cases	
63	What is the cost to make a complaint?	Dollars	
64	What is the cost to investigate a complaint?	Dollars	
65	What is the cost to file a complaint?	Dollars	
66	How many zoning complaints were resolved in favor of the client?	Complaints	
67	How many complaints resulted in zoning changes?	Complaints	
68	How many estimated persons were favorably impacted by zoning changes?	Persons	
69	How many disability complaints resulted in zoning changes?	Complaints	
70	How many estimated disabled persons were favorably impacted by zoning changes?	Persons	
71	How many persons obtained safe affordable housing?	Persons	
72	How many persons retained safe affordable housing?	Persons	
73	What was the dollar value of settlements?	Dollars	
74	What was the dollar value of purchased homes?	Dollars	
75	What was the dollar value of rental properties obtained?	Dollars	

76	How many new Fair Housing clients were served?	Persons	
77	How many new mortgage rescue clients were served?	Persons	
78	How many mortgage rescue cases were resolved to the benefit of the client?	Cases	
79	How many mortgage rescue cases were resolved through mortgage modification to the benefit of the client?	Cases	
80	How many mortgage rescue cases were resolved through refinancing to the benefit of the client?	Cases	
81	How many new Fair Housing clients were served as a result of education and outreach efforts?	Persons	
82	From the list below, choose the top three outreach and education efforts that resulted in new clients to your program: Questions 82a, 82b, and 82c contain seven possible outreach and education activities. Using the dropdown list for each question below, identify the most frequently used activity in 82a followed by the second most frequent activity in 82b and the third most frequent activity in 82c.		
82a			
82b			
82c			
83	How many disability-related cases were resolved to the benefit of the client?	Cases	
84	How many disability-related zoning cases were resolved in favor of the client?	Cases	
85	How many persons with a disability obtained affordable housing?	Persons	
86	How many persons with a disability retained affordable housing?	Persons	
87	What was the average amount of allocated PEI funding used per complaint referred to FHIP's and HUD?	Dollars	
88	Describe the population you are serving in the space below:		

	If you are collecting client level data, identify the number of persons receiving services:		
89	How many persons receiving services are under the age of 6?	Persons	
90	How many persons receiving services are ages 6 -17?	Persons	
91	How many persons receiving services are ages 18 -30?	Persons	
92	How many persons receiving services are ages 31- 50?	Persons	
93	How many persons receiving services are ages 51- 61?	Persons	
94	How many persons receiving services are over 62 years of age?	Persons	

Explanation of Any Deviations From the Approved eLogic Model®

Rating Factor 1: Capacity of Applicant and Relevant Organizational Experience (up to 25 points)

Legal Services of Eastern Michigan's (LSEM) 12 years of experience in offering fair housing services gives its staff the capacity to offer high quality service on an ongoing basis. Fourteen staff will help deliver the fair housing services listed in the Statement of Work (SOW). Of that number, seven will be at least partly funded through this grant request. (These requests are detailed in the Budget and Budget narrative.) Funding is being sought for the Fair Housing Program Coordinator, two Fair Housing Attorneys, one part-time Testing Coordinator and one full-time Testing Coordinator, the Deputy Director/Grants Manager, and the Controller. Time spent on fair housing by the Executive Director, the Director of Litigation and Training, a Directing Attorney, and two Secretary/Intake Specialists will be funded with leveraged moneys. Leveraging will also pay for time for two Housing Attorneys and one Paralegal to screen housing clients to identify possible fair housing issues. Staff members' roles and credentials are described below.

[REDACTED] acts as Program Coordinator. She joined LSEM in 2001 as the Research and Fair Housing Testing Coordinator. [REDACTED] has a Master of Public Administration from the University of Michigan. [REDACTED] spends 100% of her time on fair housing work, at least 75% (funded through HUD) of which is spent as Program Coordinator. [REDACTED] duties as Program Coordinator include: 1) supervision of Testing Coordinators; 2) working with Fair Housing Attorneys on enforcement; 3) conducting training as part of conciliation agreements, as needed; 4) conducting fair housing training quarterly for staff; 5) building relationships with agencies, like the Michigan Civil Rights Commission or participating in groups that facilitate the Center's work, i.e. the Genesee County Hate Crime Task Force. The 25% of [REDACTED] time not devoted to being Coordinator is spent on locally funded activities such as 1) outreach and education to create awareness of housing inequity and 2) research to document levels of discrimination in the service area and help identify locations that would most benefit from testing. The composite of the work the Coordinator does lays the foundation for a comprehensive fair housing effort.

[REDACTED] the Fair Housing Attorney in the Flint office, spends 100% of his time on fair housing. [REDACTED] holds a Juris Doctorate from the University of Detroit School of Law. [REDACTED] started at LSEM in 2000 as a Staff Attorney,

handling general housing issues, i.e. landlord/tenant issues, foreclosures, utility shut-offs, etc. [REDACTED] tenure in that position made him a skilled issue spotter for all types of housing issues, resulting in reassignment as a Fair Housing Attorney in 2003. After initial training in fair housing, [REDACTED] has increased his skills by attending HUD conferences and other relevant training. [REDACTED] duties include analyzing test results, initial investigation of potential complaints, referrals to and follow-up with HUD, negotiation of conciliation agreements and litigating appropriate cases.

The Fair Housing Attorney for the Tri-County area is [REDACTED]. As a life-long Saginaw resident [REDACTED] has insight into the needs of citizens living in this part of the service area. [REDACTED] has over 25 years experience in practicing law including both private practice and public interest law. [REDACTED] joined LSEM's staff in 1995. [REDACTED] has a Juris Doctorate from Saint Louis University School of Law. [REDACTED] is involved in the Saginaw County Consortium of Homeless Assistance Providers, the Ezekiel Project, Saginaw Diocese, and serves as a Board member for Mustard Seed, a faith-based homeless shelter. Since [REDACTED] is disabled, she has a unique perception of discriminatory practices affecting this protected class. In June, 2009 she honed her fair housing skills by attending the National Fair Housing Alliance training. [REDACTED] is assigned 100% to fair housing and her duties mirror those of [REDACTED].

[REDACTED] who works out of the Saginaw office is the part-time Testing Coordinator for the Tri-County area. Her duties include limited outreach, recruitment of a varied core of testers, tester training, setting up tests, and recording results. [REDACTED] is a graduate of the American Institute for Paralegal Studies and served LSEM as a Paralegal for 14 years before becoming a Testing Coordinator in 2004. As a Paralegal, she has helped disabled clients and domestic violence survivors so she understands issues facing these potential discrimination victims. As a Hispanic woman, living her entire life in the Tri-County area, she is aware of barriers minorities face in securing housing in the area. [REDACTED] added to her fair housing knowledge by attending the 2009 National Fair Housing Alliance training. All of [REDACTED] time (.50 FTE) is spent on fair housing issues. In the Flint office the Testing Coordinator position has been increased from a half-time position to a full time position (1.0 FTE). The Testing Coordinators are funded 100% through HUD. In addition to the Testing Coordinator duties [REDACTED]

performs in the Tri-County area, the Flint Coordinator will expand LSEM's fair housing screening efforts. The person will develop a new screening methodology including tools that will be used by Intake Workers and Housing Advocates in all offices to identify fair housing issues faced by any housing client anywhere in the service area. The Testing Coordinator will do this work in cooperation with the Program Coordinator and Director of Litigation and Training. The person will also conduct expanded outreach to create awareness of fair housing rights, as well as to promote tester recruitment and generating of complaints. Additionally, the person will do property identification for testing. This new approach is being instituted to further fair housing intakes throughout the service area, but is centered in Genesee County since that is the 5th most segregated SMA in the country. (See Rating Factor 2.) LSEM has not yet hired a person for this position. The hiring process will begin when grant approval is received, and the position will be filled within 90 days of signing of a contract with HUD. LSEM will post the position widely to develop a diverse, pool of applicants from which to hire. LSEM commits to giving all qualified applicants an equal opportunity to apply and be hired. The firm will use its usual stringent hiring process to screen and interview all eligible applicants so that the most qualified person can be hired.

Grant oversight is conducted by [REDACTED] Deputy Director/Grants Administrator, and [REDACTED] [REDACTED] attended the University of Michigan and has been trained in financial monitoring of Federal grants. [REDACTED] joined LSEM in 1987, and has been Deputy Director since 1992. [REDACTED] uses the PIKA computerized intake and case management system to monitor program outcomes. Added to her program reporting duties, [REDACTED] supervises [REDACTED], the Controller, who does accounting for all grants and prepares financial reports mandated by funders. [REDACTED] has over 16 years experience as an accountant and auditor. [REDACTED] has a Bachelor of Science from Central Michigan University and completed an accounting program at the University of Michigan. Since program monitoring is conducted by non-program staff it is objective, which ensures service quality. Ten percent of [REDACTED] time and 5% of [REDACTED] time are devoted to fair housing (Paid by HUD).

In addition to LSEM staff, the Center uses HUD funds to contract with individuals, representing various protected classes, who are trained to conduct tests. Trained testers are paid a small stipend and mileage per test. The Center has trained over 400 people as testers, and now has 129 active testers. The testing pool's demographic composition is: 51.6% African American, less than 1% Asian, 37.9% Caucasian, 6.2% Hispanic/Latino, less than 1% Native American, and 3.1% other. Testers are 65.8% female and 34.1% male. Of the total number of testers, 10.8% are disabled. Tester recruitment is ongoing so the Center can maintain a diverse pool of qualified testers. The number of testers and composition of the testing pool vary as new trainings are conducted. Testers must complete a thorough training that grows in difficulty depending on the type of testing they will do. HUD approved materials are used to ensure that testers can conduct paired tests per HUD testing standards as well as properly complete testing paperwork and file it with Testing Coordinators. Added to these HUD funded positions, LSEM will leverage funding for the positions described below.

Supervision of legal work done by fair housing staff in the Flint office is provided by [REDACTED], Director of Litigation and Training and Directing Attorney of the Flint office. Directing Attorney duties in the Saginaw and Midland offices are provided by [REDACTED]. Legal work conducted by Center staff is monitored for quality and includes monthly review of all ongoing open cases and review of all closed cases in which more than advice and brief service are given by these Directing Attorneys. Additionally, as Director of Litigation and Training, [REDACTED] also helps all legal staff with complex litigation and schedules training, including fair housing training. [REDACTED] earned her Juris Doctorate from Wayne State University. Before assuming her current position in 2000, she served LSEM as a housing and public benefits attorney and spent some time in private practice. [REDACTED] earned her Juris Doctorate from the University of North Carolina School of Law. [REDACTED] tenure with LSEM dates back to 1990 when she was hired as a Family Law Attorney; in 1996 [REDACTED] assumed her current position. Each will devote 4% of her time to fair housing work.

[REDACTED] LSEM's Executive Director since 1985, has 35 year's experience in the practice of public interest law. His legal career includes litigation of landmark cases involving employment and housing discrimination.

In 1998 he led development of the Fair Housing Center and is still committed to its work. [REDACTED] has a Juris Doctorate from the University of Detroit School of Law. [REDACTED] is a past presenter at fair housing conferences and served on the Governor's Task Force on Predatory Lending. His duties include oversight of all fair housing staff and activities as well as review and signing of all HUD complaints. In addition to being Executive Director, [REDACTED] also serves as the Port Huron office's Directing Attorney. In that role [REDACTED] does the same case review as conducted by the other Directing Attorneys and handles cases of housing inequity spotted by staff and deals with filing of any complaints related to them. To update his skills, [REDACTED] recently attended the John Marshall sponsored training, "Fair Housing in a Time of Crisis." Ten percent of [REDACTED] time is spent on Center operations.

Leveraged moneys also fund the work done by support staff, [REDACTED] Lead Secretary in the Flint office and [REDACTED] a Secretary/Intake Worker in the Saginaw office. [REDACTED] has over 30 years' tenure with LSEM and has worked mostly in the housing unit. An LSEM staffer since 1989, [REDACTED] has an Associate of Business Studies from Delta College with a Legal Secretary specialty. Their years of experience makes these women skilled issue spotters who, during client intake, can identify cases of possible discrimination and handle the extensive paperwork needed to start processing such cases. Both are adept at using Microsoft programs and PIKA. Each will devote 5% of her time to fair housing work.

To better identify the prevalent subtle housing inequity perpetrated in the area, the Center is expanding its fair housing screening of all housing clients both at intake and as cases progress. As explained above, the new Testing Coordinator will not only lead this program-wide effort, but will also do screening in the Flint office. Housing Advocates in each of the other offices will each spend 10% of their time on such screening. In the Center's Saginaw office [REDACTED] a Paralegal with 25 years tenure in housing law, will screen clients. [REDACTED] is a good issue spotter, who works closely with the Housing and Fair Housing Attorneys in the office. Screening to spot fair housing issues in offices serving counties where complaint-based fair housing service is offered will also be done. In the Midland office, Housing Attorney [REDACTED] will take on this duty [REDACTED] has a Juris Doctorate from Michigan State University College of Law, and has spent her whole legal career at LSEM. Screening in the Port

Huron office will be done by Housing Attorney, Sydney Rooks, who earned her Juris Doctorate from the University of Detroit School of Law. [REDACTED] legal experience includes private practice as well as her current work in public interest law. To prepare her for her duties [REDACTED] attended the 2009 John Marshall sponsored fair housing conference.

Not just staff expertise, but also the diversity of LSEM's staff as well as its Board of Directors gives added insight into needs of protective classes. LSEM's 39 member staff is 15.3% male and 84.6% female, 17.9% African American, 5.1% Hispanic, 2.5% Native American, and 74.3% White, 20.5% seniors. Accommodations have been made for 7.6%. By rules imposed by its largest funder, the Legal Services Corporation (LSC), the Board is composed of 33% client eligible members named by community agencies; 66% attorneys appointed by local Bar Associations; and one member chosen by LSEM. While LSC also mandates that the Board must include members from all over its 14 county service area, 82% are from the four counties directly served by the Center. Current Board membership is 36% female and 64% male; 18% African American, 9% Hispanic; and 9% seniors. Such diversity is an asset in promoting fair housing.

a. Organizational experience

Legal Services of Eastern Michigan (LSEM), a non-profit law firm, has offered free civil legal assistance to low-income people since 1951. Traditionally, low-income is defined as those living at 125% of poverty level or below. LSEM also serves clients with slightly higher incomes depending on funders' eligibility criteria. Also, LSEM serves fair housing clients and seniors regardless of income. LSEM's mission is to use legal skills to address causes and effects of poverty especially as related to securing survival needs. LSEM pursues its mission by offering these legal specialties: housing including fair housing; family law/domestic violence; consumer/bankruptcy including foreclosure prevention; public benefits including health; low-income tax clinics, including representation in tax controversies; senior law/elder abuse; employment including economic development; and education law. In addition to individual legal assistance, LSEM conducts systemic projects that positively impact the entire poverty community.

From its Flint office, which houses administration, Saginaw, Midland, and Port Huron, LSEM delivers services to the following Mid-Michigan counties: Arenac, Bay, Clare, Genesee, Gladwin, Gratiot, Huron, Isabella, Lapeer,

Midland, Saginaw, Sanilac, St. Clair, and Tuscola. LSEM is committed to equal access to service regardless of location or other barriers. In counties where LSEM has no office interview sites are set up at community agencies. The firm also offers home visits to the frail and disabled in its service area. The firm has a toll-free single access telephone number that routes callers to the office closest to their home as well as toll-free fax lines. To help those with Limited English Proficiency (LEP) LSEM offers 1) some legal education material in Spanish, since Latinos are the service area's largest LEP population, 2) Language Line, a telephone translation service with over 100 languages and dialects, and 3) access to bilingual translators. For the hearing impaired, LSEM has a TDD telephone line. To accommodate the physically disabled, all LSEM offices and interview sites are barrier free. These are meaningful examples of breaking down obstacles to service availability to which LSEM is dedicated.

LSEM is able to offer quality legal help in its service area due to receipt of over 25 grants, several Federal, which provide a budget of over \$2,800,000. LSEM stabilized its grant revenue through a one-time only grant to buy a building that houses its Flint operations and provides rental income. LSEM's ability to deliver service is augmented by over 400 pro bono attorneys who offer its clients added free legal assistance with limited cost to the firm. In addition to HUD funds, the firm's ability to deliver fair housing services is increased by grants from Genesee County, the City of Bay City, and the Center for Civil Justice. LSEM also receives income from FHIP funding, such as conciliation settlements, which support ongoing direct fair housing service. LSEM has a proven ability to secure a variety of funding and provides proper fiscal oversight of all grant moneys received.

LSEM funding is used to deliver its core services, and housing is a chief priority; in 2008 37% of all legal services LSEM offered were in housing. This work not only gives LSEM insight into general housing issues faced by the poor but also an understanding of the degree of housing discrimination present in Mid-Michigan. LSEM's expertise in handling discrimination issues dates back to the 1970's. Progress made since the Center was set up in Genesee County in 1997 with funding from C. S. Mott Foundation includes:

- In 2001, with two year's experience, received first HUD funding to provide fair housing services

- In 2004 expanded fair housing services to Bay, Saginaw, and Midland Counties
- In 2005 received HUD funding to sponsor Legal Aid and Defender Association (LAD) to develop a Fair Housing Center to serve Oakland and Macomb Counties
- In 2006 LSEM received a second C.S. Mott fair housing grant for \$125,000
- Conducted Impediments to Fair Housing Studies: Bay City in 2002 and a current 5-year contract for an annual update to the study, Genesee County in 2006 and the City of Midland /Midland County in 2006
- Over a 7 year period, LSEM has leveraged about \$500,000 of local government funding

To further its fair housing work the Center nurtures positive working relationships with a variety of community agencies serving protected classes. Examples are: independent living centers, senior citizens centers, mental health agencies, Minority Serving Institutions, Our Lady of Guadalupe, Catholic Charities, Hispanic Cultural Ministries, Hispanic Services Center, Migrant Workers' Councils, and the Urban League. To systemically curb inequity LSEM: 1) is involved in Continuums of Care for Homelessness, 2) works on two domestic violence coalitions, 3) leads three elder abuse task forces, 4) leads an Individual Development Account project, which lets the poor set up matched savings accounts that can be used to build assets, i.e. buying homes, and 5) has worked on tax reversion projects to save homes. Such activities foster contact with protected classes and build partnerships with agencies serving these populations, both of which increase the Center's capacity to impact housing inequity.

c. Performance for Past Projects (Current FHIP Grantees – 5 points)

Testing, enforcement, outreach, and education to increase awareness of fair housing issues and limit discrimination are the activities conducted by the Center. To ensure quality of testing, HUD standards are strictly maintained in testing protocol, all tester-training materials, testing procedures, maintenance of enforcement and testing expenditure logs, etc. The Center maintains a diverse pool of trained testers, and conducts a comprehensive survey testing program of rental sites, realtors and lending institutions as well as responding to complaints. If evidence of discrimination is found, repeat tests are conducted, and in all cases in which retesting points to a

recurring evidence of discrimination HUD is sent a complaint for investigation. The Center conciliates complaints, and offers training as part of conciliation agreements, as appropriate. The Center also conducts systemic projects and/or targeted investigations into specific parts of the housing market or to benefit certain protected classes. Examples of projects are assessment of handicapped access to public transportation and parking in public housing. These projects resulted in breaking down barriers so the disabled could better access housing. Recently, the Center completed a project in Genesee County in which handicapped parking assessments for all public buildings in each municipality were done. Many municipalities have already come into compliance.

Limited education and outreach create awareness of housing rights and discrimination, help tester recruitment, and encourage complaints. Also, the three separate Advisory Boards convened quarterly by the Center, offer a chance for outreach as well as community input. The groups are composed of a variety of members, i.e. government officials, staff of agencies serving protected classes, etc.

Listed are examples of achievements made in the first six months of the grant period. Added progress has already been made since the HUD Quarterly Monitoring Report was filed June 30, 2009.

- 11 tester trainings were conducted: has exceeded annual goal
- Is maintaining a testing pool of 129: has exceeded annual goal
- 144 paired tests conducted: 59% of goal has been met
- 5 enforcement proposals have been sent to HUD: 20% of goal has been met (Since June 30, 2009 seven more proposals were filed rising the completion rate to 48%; it is expected this goal will be met.)
- 9 conciliation agreements have been generated: 60% of goal has been met
- 31 intakes from the community were received: has exceeded annual goal
- 11 education seminars have been held: has exceeded annual goal
- 8 working agreements signed with other agencies serving protected classes: 100% of goal met
- No Advisory Committees were held (partly due to bad weather): meetings will begin in 3rd quarter

The Center's fair housing work reaches far beyond the work done in its own service area. LSEM received HUD funding to help the Legal Aid and Defender Association found a Fair Housing Center, to serve Oakland and Macomb Counties. This effort was successful and the LAD Center applied for and received HUD funding in its own right for FY 2008-2009. While the LAD Center runs independently, the staff participates in quarterly training LSEM offers its fair housing staff. The result is an ongoing unified regional approach to fair housing enforcement that stretches along the I-75 corridor. LSEM also assisted the Grand Rapids Fair Housing Center with its initial funding. Not only was the Center successful, it is now the only FHAP in the state. LSEM has a positive working relationship with the Center. LSEM's Executive Director, [REDACTED], has been engaged at both the State and local level in activities positively impacting fair housing. He served on the Prisoner Reentry Housing Subcommittee for the State, which affected statewide housing policy for newly released prisoners, and offered similar input to the local Steering Committee for Genesee, Shiawassee and Lapeer Counties. This work lessens possible discrimination for returning prisoners. [REDACTED] also served on the Governor's Predatory Lending Task Force.

For over 30 years Legal Services of Eastern Michigan has promoted civil rights, including rights to equal housing. Dedication to equal justice was the impetus for the 1997 founding of a Fair Housing Center. Since LSEM received its first HUD grant in 2001 to offer fair housing in Genesee County through its expansion into the Tri-County area until today, LSEM has met or exceeded the number of tests it estimated it would conduct. It has also met or exceeded almost all other goals set, including conducting several systemic projects. This body of work has curbed discrimination in its service area. However, not only has LSEM met service goals, it has done so with quality fair housing services, as seen by the excellent ratings it received on all HUD performance reviews; several, including the most recent review were perfect 100's. LSEM's Fair Housing Center of Eastern Michigan has proven its capacity to continue to deliver quality fair housing services to a four-county area that has a need to address documented high levels of discrimination.

Rating Factor 2: Need/Distress/Extent of the Problem (up to 20 points)

In an April 1, 2008 press release proclaiming the 40th anniversary of passage of the Fair Housing Act (<http://www.hud.gov/news/release.cfm?content=pr08-047.cfm&CFI>), Kim Kendrick, [then] HUD Assistant Secretary for Fair Housing and Equal Opportunity stated, "Forty years after passage of the Fair Housing Act, an alarming number of families are still denied housing and still need the protections this landmark law offers. Kendrick also stated, "The number of reported complaints (10,000 in 2007) underscores the import of HUD's continued enforcement, education, and outreach activities to ensure that all Americans have equal access to housing opportunities." To respond to this ongoing need called for by Assistant Secretary Kendrick, Legal Services of Eastern Michigan's (LSEM) Fair Housing Center of Eastern Michigan offers a full range of fair housing services in Genesee, Saginaw, Bay, and Midland Counties and complaint-based work in Lapeer, St. Clair, Sanilac, Huron, Gladwin, Arenac, Gratiot, Clare, and Isabella Counties.

Of the Fair Housing Center's target area, Genesee County has the highest segregation level. Andrew Highsmith (<http://www-personal.umich.edu/~mlclassite/highsmith.html>) shows this in his 2005 study "America Is a Thousand Flints: Race, Class, and the End of the American Dream in Flint, Michigan". "For most of the twentieth century, observers from around the world looked to Flint, Michigan, and its most famous offspring, General Motors, as a microcosm of the American Dream. Today Genesee County is a landscape of Dickensian extremes. It is a place where unimaginable privilege and wealth coexist uneasily with mind numbing squalor—a place where white people and black people live and learn separately and unequally despite the poverty that moves freely across the color line. The mid-sized city ... is now in a state of permanent crisis—internationally branded by its unemployment, shrinking population, failing schools, racial and economic segregation, and decaying infrastructure. By nearly all accounts, and without a shred of hyperbole, the Genesee County of 2005 is one of the most racially segregated, economically polarized, and spatially divided urban regions in the United States."

Highsmith's analysis is supported by other research. In 2005, using the 2000 Census, the Fair Housing Center updated the 1998 Genesee County Impediments Study (based on 1990 Census data) and concluded that housing

inequity had worsened during the intervening 10 years. The 2000 Census "Segregation: Dissimilarity Indices" was examined and showed the Flint Standard Metropolitan Area to be the 7th most segregated SMA in the nation. (http://www.censusscope.org/us/print_rank_dissimilarity_white_black.html) However, the most up to date material available, a 2009 research paper titled, *Segregation and the Subprime Lending Crisis* by Gregory D. Squires, Derek S. Hyra, and Robert N. Renner, which was presented at the Federal Reserve Board's Affairs Research Conference, determined that the Flint SMA is now the 5th most segregated SMA in the country. These research studies show an almost 30 year track record of worsening segregation in the Flint SMA that is continuing to grow due to the economic trials the area is facing.

The 2000 Census showed Genesee County had 436,141 residents; of that total, 75.3% is White, 20.4% is Black, 2.3% is Latino, 0.6% is Asian, and 0.6% is Native American. By studying declines and shifts in various populations in the County, the reality of housing discrimination is clear. Census data shows the County's overall White population dropped by 2.9%, or 8,301, between 1990 and 2000. However, in that decade, the decline of the White population was much larger in specific municipalities in the County: 1) in Flint the number of Whites dropped by 18,078, Flint Township lost 4,033 Whites, and Mt. Morris's White population fell by 2,853. The result is that while the County has 31 units of government, 92% of Blacks live in just three (the City of Flint, Flint Township, or Mt. Morris Township). Of the over 88,000 Blacks in the County, over 66,000, or 76%, live in Flint. Such population shifts cause Blacks and Latinos to be unable to overcome exclusionary and segregative barriers to housing. One reason for such inequity is white flight.

Eric Bickford explains this trend in [White Flight: The Effect of Minority Presence on Post World War II Suburbanization](http://eh.net/Clio/Publications/flight.shtml) (<http://eh.net/Clio/Publications/flight.shtml>) "Following World War II, the U. S. underwent an urban transformation. Census data shows that from 1950 to 1960, central city populations in the largest 25 SMAs grew by over 3%, while suburban populations grew by over 60%. Urban stagnation resulted as whites migrated to suburbs while the number of blacks in central cities rose." White Flight explains not only segregation of Blacks, but also

Latinos. While Latinos are only .08% of the County's population, 37% of them live in Flint. White Flight is seen in the Center's whole service area, but especially in highly urban Genesee County and Flint.

In addition to racial segregation, other classes protected under Civil Rights legislation also suffer housing discrimination. Census data shows that segregation of the disabled exists in 13 County municipalities and in 13 of 41 census tracts in Flint. Gender discrimination, too, is widespread in the City.

Causes for high segregation levels in Flint are many. First, since 1990, Flint's population has steadily fallen. The 2002 report, (<http://www.pscinc.com/Documents/urbanstatus/2002/index.htm>) *Status of Michigan Cities, An Index of Urban Well-Being*, states, "Flint had the largest net migration rate of all cities studied, -28.9%." The 2003 U.S. Census Department projections in population change since the 2000 Census forecast Michigan's population would change by 1.6% and Genesee County's would vary by 1.3%, but the predicted rate of change for Flint was -3.7%. Such major population drops cause segregation to rise. Second, the Michigan League for Human Services report, "Poverty in Michigan's Counties, Cities and Townships (with population over 65,000): 2005," stated "the total poverty rate for Genesee County is 15.9%, the 7th highest of all counties studied. Of the 21 cities studied, Flint's 32% poverty rate was highest." Flint's Consolidated Plan states that "30% of all City families have median incomes of \$8,600." Per the U.S. Bureau of Statistics Michigan's jobless rate was 15.2% in June, 2009; this was the first time any state since West Virginia, in March, 1986, reported unemployment rates topping 15%. Also in June, Flint had a 26% jobless rate. While no proven link exists between income and inequity, a disproportionate number of poor people suffer discrimination. Third, Flint's Consolidated Plan depicts the City's poor housing; "Of the County's 1,186 boarded houses, 8,326 more are unoccupied, but not boarded, and most are in Flint." Fourth, the Genesee County Land Bank reports that the County (minus Flint) had 106,373 owner occupied houses and of this total 477 or 0.5% were lost to tax foreclosure since 2002. In Flint 42,662 houses are owner occupied and in the same period 2,339 or 5.5% were lost to back taxes, making the City's tax foreclosure rate 11 times greater than that of the out County.

Data cited here shows the need for fair housing services in Flint and Genesee County. The area profits from education offered by the City Department of Human Relations, the Community Housing Resource Board, and the Hate Crimes Task Force. The County also has a local office of the Michigan Department of Civil Rights. LSEM's Fair Housing Center cooperates with these entities, but it is the only agency in the area doing testing and enforcement, and these services must be continued to positively impact fair housing.

Like Genesee County, the Saginaw SMA has a high level of housing inequity. The 2000 Census Dissimilarity Indices (http://www.censusscope.org/us/print_rank_dissimilarity_white_black.html) compared Saginaw SMA segregation levels to 45 other Michigan cities and found it to be the 10th most segregated city nationally. The Indices ranks the Saginaw SMA 1st in segregation of Native Americans, 2nd in segregation of Blacks, and 7th in segregation of Asians. A historical look at Census data offers some insight into this high segregation level. Between the 1960 and 2000 Census the City of Saginaw's population dropped from 100,000 to 61,799. As population declined racial polarization and discrimination grew. In 1960 16.8% of the City's population was Black, but by 2000 the percentage had soared to 43.2%. The same pattern is seen for Latinos who, in 1970, made up 6.85 % of the County's population, but rose to 11.7% by 2000. Census data shows that 65% of all Blacks and 57% of all Latinos in the County live in the City. From 1980 to 1990 the County's Asian population rose by half, and has stayed rather stable since. Asians and Latinos may suffer added cultural and language barriers that isolate them. Language barriers can cause unemployment, underemployment and low wages that lessens the ability of these groups to access decent housing. Census data shows inequity also affects other protected classes, i.e. of the 192,821 disabled people living in the County most are confined to the same low-income City census tracts where minorities live. Unequal population distribution is also seen for the County's 15.4% female heads of household. The Census Department's 2003 estimated an ongoing fall in population in both Saginaw County and the City of Saginaw; the estimated drop for the County was -1.8%, while a -4.1% drop was projected for the City. Population decline plus increased poverty leads to increased housing inequity.

In *Saginaw Metropolitcs: A Regional Agenda for Community and Stability*, Myron Orfield examined national trends of poverty's affect on housing equity and applied it to Saginaw. Quoting Paul A. Jargowski's and Mary Jo Bane's "Ghetto Poverty in the United States, 1970–1980," Orfield writes "...in central cities of most major U.S. metropolitan areas, there is a subset of distressed census tracts with more than 40% of the populace below the federal poverty line. Between 1970 and 1990 the national poverty rate dropped from 13.6% to 12.8%, while, the urban poverty rate increased from 10.9% to 11.8% resulting in losses in the commercial sector, unemployment increases, erosion of the tax base, and deterioration of housing. So, the most fiscally able fled the cities, and poverty reached into older, more economically deprived adjacent communities." Continuation of this trend is seen in the Michigan League for Human Services' 2007 poverty analysis. Of the 28 counties studied Saginaw County's poverty rate was 17.5% or 5th highest in the State. The 2000 Census shows that the 1999 mean income for Saginaw County was \$38,637. However, of the 20 City Census tracts located in the City only one, Tract 15, had an income level equal to or above the mean. Tract 15, west of the Saginaw River in the wealthier area of the City, had a mean income of \$44,640. In nine of the City's 20 census tracts over one-third of the citizens live in poverty, and all nine are located near the urban hub. Clearly, when County poverty rates are compared to the 40% poverty rates in census tract data for the City, the greatest negative effect is on protected classes living in the City. Michigan Department of Energy, Labor & Economic Growth data cites the jobless rate for Saginaw-Saginaw Township North for June of 2009 as 14.6%. This can lead to increased poverty and the potential for rising discrimination rates.

Compounding the poverty facing protected classes is poor housing quality in City Census Tracts where most of these people live. Demolition of substandard housing, conversion of older homes to non-residential use, depressed market values which discourages private redevelopment coupled with a history of suburban development has furthered flight so the City's population is now mainly comprised of poor minorities and members of other protected classes. In today's economy this imbalance is likely to go unchecked.

Two years ago the local Community Housing Resources Board (CHRB) conducted an Impediments to Fair Housing Study. However, since the Study focuses only on the City of Saginaw and analyzes mainly racial

discrimination, particularly among Blacks it does not represent a complete picture of the level of discrimination existing in the City. LSEM research shows that other protected classes, like the disabled, also face housing inequity, but no such disparities are reflected in the Study. Recommendations resulting from the Study are included in the City's 2005-2010 Consolidated Plan. Only one recommendation expresses a need for fair housing efforts beyond educational; it states the goal of "providing fair housing counseling, investigation and resolution services to citizens or potential citizens of Saginaw." The CHRB now offers educational programs and very limited testing only in the City of Saginaw, rather than providing services countywide. These limited CHRB services do not respond to the scope of service called for in the Study's recommendations. LSEM's Fair Housing Center offers the only other fair housing services available in Saginaw County. The comprehensiveness of its services and the weight on testing and enforcement address fair housing issues not only in the City of Saginaw, but the entire County as well as regionally. The result is an effort to curb discriminatory housing practices systemically.

Affirmation of Orfield's theories about the regional spread of discrimination is verified in the *City of Bay City Impediments to Fair Housing Study 2002*. The Study, prepared by LSEM, updates demographic data, lending patterns, and other factors affecting discrimination in the County as well as Bay City. The Study used 2000 Census data to show that most minorities living in Bay County live in the City of Bay City; 47% of all Blacks, 33% of all Latinos, 29% of Native Americans, and 23% of Asians reside in the City.

Bay City mirrors the same exclusionary and segregation barriers to fair housing as seen in the Center's entire service region. Exclusion occurs when a specific group is barred from living in an entire area or Census tract. Of the City's 13 Census tracts underrepresentation of Blacks existed in eight and Latinos in seven; these Census tracts are also the poorest. Another barrier to fair housing is residential segregation; overrepresentation exists in some parts of the City and underrepresentation elsewhere. Of all Blacks in the City, 60% live in four census tracts, and 51% of Latinos reside in just four census tracts. Two of these four census tracts have a high number of both races, and are adjoining, which creates a high concentration of minorities in one place. Census data confirms that segregation by race is the City's most common type of discrimination. The Census Dissimilarity Indices states that

Bay City ranked 3rd in segregation of Asians and 5th in segregation of Native Americans. Results of the Center's ongoing testing provides an update from the 2000 Census of types of discrimination being perpetrated, i.e. recent tests and complaints show the disabled are increasingly victimized by discrimination. The 2003 Census Department population change data forecast a -1.6% change in Bay County and a change of -3.8% in Bay City. This data shows that the people with the greatest mobility are leaving the City in larger numbers than in suburban areas, which increases the already high levels of segregation of all protected classes living in Bay City.

A comparison of poverty rates between the County as a whole and the City show that City rates are higher. The Michigan Urban League Study states that the County has an overall poverty rate of 10.2%. However, 2000 Census data lists the City's overall poverty rate at 14.6%, over 4 percentage points higher than the County rate cited in the Urban League Study. As Michigan's economy continues to suffer poverty rates rise. One reflection of this is a February 25, 2009 Bay City Times article, "Unknown How Many of Dow Corning's 800 Cut Jobs Will Come from Bay County," which states "...The impact will be felt at all of Dow Corning's 45 global locations, including its headquarters in Bay County's Williams Township." In May of 2009 the Department of Labor reports that the Bay City MSA had an unemployment rate of 12.5% up from 11.5% in April. Based on the distribution of the poverty population, it can be assumed that the greatest effect of these elevated unemployment rates will be on Bay City residents.

Bay City's Consolidated Plan contains an Annual Plan that traditionally includes strategies to address fair housing in the community. One example of the City's commitment to impact fair housing is appointment of a Community Development Department staffer as the City's Fair Housing Officer to conduct fair housing education and forward claims of discrimination to the Center. The City also impacted fair housing by using CDBG and HOME funds for housing rehabilitation, lead remediation, and a ramp program for the disabled, which increases the amount of safe, affordable, accessible housing available in the City. This indirectly helps curb housing inequity. Since 2004 Bay City has used CDBG funds to support the Center's testing and enforcement efforts. In 2008 the

City entered into a five year contract with LSEM to provide an annual update to a portion of its existing 2002 Impediments Study. Information elicited from the Study will help direct future City strategies to address fair housing.

Midland County bears the same signs of housing inequity that plagues the rest of the service area. LSEM's "Fair Housing Impediment Study for Midland County 2005", shows that while Midland County is the wealthiest part of the service area and minorities make up only a small percentage of its total population discrimination exists. In the past 20 years, the County's total population grew by 9,296. Census data shows that from 1980-1990 there was a 3% population increase and from 1990-2000 another 9% rise. The data also shows that while the County's White population decreased, the number of all minorities rose. In 2003 population estimates made by the Census Department showed that the population is still growing, but more slowly; a 1.1% population rise over 2000 figures is predicted for both the City and County. CensusScope 2000 shows that the County's largest minority group, Latinos, comprise only 1.6% of its total population, but 57.9% of them live in the City. Underrepresentation of Latinos exists in 11 of the County's 18 municipalities. The same disproportionate distribution of other minorities is also true. Asians, the County's second largest minority group, is 1.5% of the County's populace, but 99% live in the City. Blacks represent only 1% of the County's population, but 87.4% of all Blacks live in the City. While race seems to account for the greatest number of discrimination cases in the area, other protected classes also suffer from exclusionary and segregative barriers to housing. For example, Census data shows that of the 11,589 disabled people, over the age of five, living in Midland County, 45% are City residents. Housing inequity is widespread.

Midland County is unlike any other part of the Center's service area. The great wealth present in the County has to date resulted in few to no findings of correlation between median income, poverty rates, and unemployment to the high levels of minority segregation seen in the City. The City of Midland, where most minorities and disabled live, has the second highest median income in the County, \$48,632. The only place in the County with a higher median income is Midland Township at \$50,327. Median rental rates and housing values replicate that pattern. The City's median rental rate of \$456 per month is higher than in 14 out of the County's 18 other municipalities. Further, only one other municipality has a higher median housing value than the City's \$114,400. The 2005 Impediments

Study concluded segregation in Midland County seems to be “based more on race than class.” This finding was supported by the Study’s analysis of discriminatory practices and policies of real estate brokers, apartment managers, lending institutions, and landlords that exclude minorities from living in municipalities where they are so underrepresented.

While unemployment and low income have seemed not to factor into Midland’s segregation in the past, recent trends may cause that to be reassessed. On February 25, 2009 “The Saginaw News” reported “Dow Corning Cuts Help; Company Positions Itself.” “The company announced it will shed 800 of its global workforce of 10,200 employees, a nearly 8% cut. Dow Corning has about 3,500 employees in Michigan and about 1,300 in the region (similar to the area served by the Center).” The June 26, 2009 edition of the “Midland Daily News” stated “The May 2009 jobless rate of 9.9% was up from 8.9% in April. Last May, the rate was 6.1%.” Sperling’s Best Places ([http://www.bestplaces.net/city/Homer_township_\(Midland_county\)-Michigan.aspx](http://www.bestplaces.net/city/Homer_township_(Midland_county)-Michigan.aspx)) reported, “Midland’s recent job growth is negative, and County jobs have dropped by 4%.”

LSEM’s Impediments Study persuaded City and County officials who thought discrimination did not exist in their area, to begin addressing the issue. Examples of their commitment include a press conference acknowledging the community’s housing discrimination and funding for a limited testing and enforcement project to provide an ongoing analysis of the prevalence of housing inequity in the area. The result has been a partnership between the Fair Housing Center, the only entity in the County that delivers fair housing services, and governmental entities to work together to positively impact housing discrimination.

Data gathered from the Census and research studies indicating the presence of housing inequity in the Center’s four-county service are confirmed by test results from the Center. Testing and enforcement activities conducted by the Center in 2008 include: 1) 287 tests were conducted, 2) 21 enforcement proposals were filed with HUD, 3) 5 conciliations were settled and the rest were addressed in 2009, and 4) 1 case was settled with litigation. Of the tests conducted race was found to be the protected class that suffered the most discrimination and disability was a close second; these results mirror those found by HUD on a national level. The Center also conducted one

systemic project per office. As with the testing and enforcement efforts, these projects positively affected discriminatory practices.

Realizing the need to address housing inequity regionally, the Fair Housing Center not only offers a full range of fair housing services in its four-county service area, but also offers complaint-based fair housing in the rest of LSEM's service area: Arenac, Clare, Gladwin, Gratiot, Huron, Lapeer, Isabella, Sanilac, St. Clair, and Tuscola Counties. The need to provide services in these 10 counties is documented by 2000 Census data. Data shows the area has two major minority groups, Latinos (mostly in the Thumb area) and Native Americans (mainly in the northern counties) who need access to fair housing services. While the overall percentage of minorities in each county is small, numbers in Lapeer, Huron, Sanilac, and Tuscola Counties grow in the summer with arrival of migrant workers. Since these 10 counties are mainly rural they lack the help that exists in more urban areas. Response to fair housing complaints from rural areas includes the same follow-up paired testing and preliminary investigation done in the rest of the Center's service area. Fair housing work conducted in these areas is significant, because it not only curbs housing discrimination for protected classes living there, but also positively impacts the Center's four-county main target area.

Data and studies cited here adequately document the presence of high levels of segregation in the Center's four-county target area. For over a decade the Center has effectively provided fair housing services. To continue this important work the Center must offer 1) testing and enforcement activities to limit housing discrimination against all protected classes, 2) enforcement activities to secure accommodations for the disabled to expand their access to housing, 3) address the obstacle of poverty by improving accessibility to safe, sanitary, affordable housing, and 4) conduct targeted investigations/systemic change projects that will lead to permanent positive change. Continuation of these services will decisively impact housing equity.

Rating Factor 3: Soundness of Approach (up to 40 points)

Since 1951, Legal Services of Eastern Michigan (LSEM), a non-profit law firm, has offered free civil legal assistance. By combining its routine delivery of legal services with the work done by its Fair Housing Center of Eastern Michigan, LSEM meets the needs of members of all protected classes while promoting HUD's national policy priorities and strategic goals.

Priority A. The Center's purpose is to curb discrimination and expand rental and homeownership opportunities for protected classes to attain safe, decent, affordable housing. This goal is addressed partly through the Center's limited outreach and education efforts which make homeowners, potential homebuyers, and renters more aware of housing rights and what constitutes discriminatory housing practices. But, the Center's main impact on curbing housing inequity is testing and enforcement. The Center conducts paired tests, whether complaint or survey-based; files complaints; and negotiates conciliation agreements. Testing targets rental property, including HUD and MSHDA funded subsidized housing; realty companies; and financial institutions. Testing helps deter discriminatory practices by housing complex managers, rental agents, realtors, and lenders, i.e. the Center's testing of financial institutions deters predatory lending and supports Fair Lending Practices. By educating apartment managers and realtors as part of conciliation, discriminatory practices are reduced. The testing protocol allows for filing complaints with HUD or, as needed, the Michigan Department of Civil Rights. To help promote fair housing the Center signs formal working agreements with community agencies. These agreements allow for reciprocal referrals and include the Center's referral protocol. Also, by proactively engaging municipalities, the Center has been able to promote some ordinance and regulatory changes to minimize barriers to fair housing. The Center also does targeted investigations to further home ownership and rental options. Such targeted investigations often focus on a specific part of the housing market, i.e. testing of mobile homes or a certain protected class, the disabled, or subset of it. This body of work furthers the Center's mission of increasing housing options for members of protected classes.

LSEM sees 100's of clients a year through its routine housing services, and many are protected classes with potential fair housing issues. This year one advocate, alone, identified three incidents in which clients were being

evicted due to making disturbances that interfered with the quiet enjoyment of other residents. In each case the client had mental or cognitive disabilities that caused his behavior so these people were deemed part of a protected class. Landlords were forced to make accommodations by allowing the clients to seek proper medical care and/or medications that resolved the problem that had triggered their eviction notice. All of these clients have retained their homes. These people were identified due to LSEM's current screening program. However, this experience showed the need for an expanded screening effort, because so many clients are untouched by survey testing, nor do they file complaints, because they are unaware they are being discrimination against. This effort will target clients throughout LSEM's service area. This effort will be implemented by the new full-time Testing Coordinator housed in the Flint office. Center staff is confident that the expanded screening will raise the number of clients receiving fair housing services. To show LSEM's commitment to this effort, only the Testing Coordinator's position is funded through HUD, other staff involved in screening will be funded via leveraging. These efforts will further HUD's priority of expanded homeownership and rental opportunities for all protected classes.

LSEM also promotes this HUD priority while offering routine non-HUD funded services. This work includes handling landlord/tenant situations, i.e. repairs. When handling repair issues advocates use such legal strategies as having clients withhold rent, enforcement of code violations, etc. Ultimately, forcing repairs makes more clean, decent housing available in the community and contributes to stabilizing the whole neighborhood, thus furthering HUD's goal of improving communities. Advocates also help curb rental of condemned property and often succeed in forcing owners of these properties to return some rent and/or security deposits so the client can move to a new home. Advocates also address utility shut-offs and lock-outs. Other issues impacting housing handled by advocates include land contract forfeiture, tax and mortgage foreclosures LSEM also has a history of attacking predatory lending via casework and development of educational prevention materials to deter predatory lending. LSEM received a Department of Justice grant to write a financial exploitation manual for seniors; one section dealt with predatory lending. Also, the Michigan State Bar Foundation funded LSEM to develop material on predatory lending to use with its own clients, the public-at-large, or staff of other community agencies that could then identify possible

predatory lending and either help their clients or refer them to LSEM for assistance. Also, LSEM's Executive Director served on the Governor's Task Force on Predatory Lending, which helped develop State policy to negate predatory lending as a barrier to homeownership. This work has had local impact.

With non-HUD funds, LSEM has reinstated its consumer/bankruptcy services, which responds to the foreclosure crisis facing LSEM's 14-county service area. The program helps clients deal with consumer issues, i.e. delinquent utility bills for which they may not be liable; assess clients' financial situation; and if warranted, file Chapter 7 Bankruptcies or Chapter 13 Bankruptcies. This work helps reestablish good credit and saves homes.

LSEM also helps clients attain homes by increasing access to public benefits. Advocates help clients who have been denied benefits ranging from Food Stamps to Medicaid to obtain them. Much of this legal work involves help in securing income maintenance benefits for clients, i.e. disability-based SSI, which enables members of this protected class to afford and retain housing. In addition to the Legal Services Corporation, part of this effort is funded by MSHDA as prevention for homelessness.

LSEM also helps the working poor, many of whom are members of protected classes via a Genesee County Individual Development Account Program (IDA), which is a proactive response to Michigan's severe economic decline. (See Rating Factor 2) The IDA gives the working poor a chance to start a savings account that is matched dollar for dollar up to a maximum of \$4,000. Participants' matched savings can be used for first time home purchase, post-secondary education, or business start-up. This asset building effort directly and indirectly helps the working poor access housing. These varied legal services augment LSEM's fair housing efforts and increases access of protected classes to housing without use of HUD funds.

Priority B. – The Center encourages accessible design features and visitability in housing. This work directly promotes decent, affordable housing for the disabled, many of whom are older adults. But this work also improves housing in a way that benefits all protected classes. To reach this priority Center staff developed a brochure titled “A Fair Housing Guide for Reasonable Accommodation and Modification,” which includes information on how the Americans with Disabilities Act defines structural accessibility. This material also includes information on Energy

Star. (See Priority F.) The brochure is distributed to the disabled through all the Center's agency partners serving this population and at presentations for this audience. The material is also distributed at fair housing conferences where attendees include representatives of landlord associations, realtors, housing developers, etc. The material is also shared at Genesee County Quarterly Fair Housing meetings, attended by municipalities, housing developers, etc., Also, LSEM convenes Fair Housing Advisory Boards that have among their membership representatives of agencies serving the disabled and seniors and rehabilitation entities. As LSEM handles routine housing cases, especially those involving repairs, it uses these educational materials so repairs are made with accessibility in mind. If the client being helped is disabled, the case resolution will require a request for accommodation, as warranted. One example of a possible accommodation is installation of a walk-in or roll-in shower for those in wheel chairs. These efforts are ongoing to increase accessibility to housing for the disabled.

Priority C. – Through outreach and education the Center offers members of grassroots, faith-based, and other community organizations full and equal access to involvement in its fair housing efforts. To facilitate this work some fair housing materials have been translated into Spanish. Presentations describing one's fair housing rights have been held for members of various groups, like public housing tenant groups, neighborhood groups, mosques, churches, etc. This will help members of these groups identify possible instances of discrimination and potentially generate complaints the Center may not otherwise receive. Educational sessions also serve as a source of possible tester recruitment, often for members of protected classes. By working with members of such groups, they are increasingly involved and can, if they desire, partner in positively impacting fair housing by becoming testers, etc. The Center also enters into working agreements with such agencies in order to increase the number of people reached and build a stronger formalized cooperative relationship.

Priority D. – During this program year the Center has worked with four of the eight Minority-Serving Institutions (MISs) in the service area (University of Michigan-Flint, Kettering University, Baker College, Mott Community College, Saginaw Valley State University, Delta Community College, Spring Arbor College and Davenport University). This effort is important in reaching minorities, especially Blacks, the largest minority group in the service

area, and Hispanics, the largest Limited English Proficiency (LEP) group. Like the work done with grassroots and faith-based groups, the main focus is education. Translation of some materials into Spanish has helped reach an LEP population that might otherwise go unserved. In the coming year an effort will be made to translate some materials into Arabic to reach the growing Arabic population in parts of the service area. Translation of materials is key to serving LEP populations. Examples of work done with MSIs this year includes: speaking at Baker College and SVSU and an ongoing relationship with a social work class at U. of M. that resulted in recruitment of testers. LSEM also had interns from both Baker and Davenport. This is systemic work that engages minorities, faculty and especially, students, who can gain knowledge, and, if they desire, become change agents in their community. In FY 2009-2010 the Center will work with the MSIs it now serves and connect with at least two others. The Center benefits from the increased awareness of discrimination and broadens its base for recruiting testers.

Priority E. – LSEM addresses homelessness with preventive legal services offered as part of its routine legal assistance. LSEM also addresses needs of the chronically homeless. HUD states, “In general, a chronically homeless person is an unaccompanied disabled individual who has been continuously homeless for over one year.” (<http://www.hud.gov/offices/cpd/homeless/chronic.cfm>) By definition, the chronically homeless fall into one of the protected classes the Center helps. Survey testing and targeted investigations both offer increased access to housing for this population. In working with this population the Center will seek proper accommodations for each person’s disability so housing can be attained and retained over time. LSEM’s routine work in helping clients secure disability-based benefits will also help the chronically homeless secure housing. While the Center will not directly address Priority G., assisting veterans, a significant number of the chronically homeless are veterans. So, the Center will indirectly meet the needs of a portion of this population. To systemically address chronic homelessness, LSEM works with Continuums of Care (CoCs) in its 14-county service area. This work is a type of outreach that allows LSEM to make other agencies aware of the link between homelessness and fair housing. Working with CoCs also allows LSEM to proactively plan program development to address homelessness, such as partnering with shelters to overcome discrimination-based barriers to housing as the disabled exit shelters and working with CoC

members to secure public housing set-asides for the chronically homeless. This work stimulates referrals so the Center can intervene with testing, securing accommodations, etc. that increases housing access for the disabled.

Priority F. – Since protected classes seem to be disproportionately affected by poverty (see Rating Factor 2), the Center supports efforts to make housing more affordable and accessible. To this end the Center will promote Energy Star and Green Development. The Center now uses the educational program described in Priority B to address Energy Star. A brochure has been developed that ties information on Energy Star and universal design together, because it is used with like audiences, i.e. housing agencies and contractors. The material has been well received to date. As LSEM pursues housing repair issues via its routine legal work it supports use of Energy Star, i.e. more efficient heating systems. As fair housing issues are handled the material can benefit the disabled, i.e. the material specifies that as part of enforcement the disabled have the right to request Energy Star appliances as part of an accommodation. Green development has not been part of this educational effort in the past, but, as materials go through an annual review, data on green development will be added. Contact will be made with a company dealing in green develop to secure help in redesigning the current brochure to include this valuable information.

b. Proposed Statement of Work (SOW) and Information Requirements (17 points)

The Statement of Work (SOW) lists the Fair Housing Center's planned activities for FY 2009-2010. Activities are ongoing. They are not listed in order of importance, as all are vital to the Center's ability to respond to housing inequity in the Center's service area as cited in Rating Factor 2. The SOW timelines the Center's work and specifies the staff member who will complete it. All Center staff is qualified to do the work delegated to them (see Rating Factor 1). Below, activities listed in the SOW are detailed.

The Center's current testing methodology is HUD approved. The process is regularly reviewed, by the fair housing staff, so it can be improved, as needed. Changes are sent to HUD for approval. The part-time Testing Coordinator in the Saginaw office conducts tester recruitment, does tester training with HUD approved materials, schedules tests, and records test results. The full-time Testing Coordinator in the Flint office will perform like duties plus lead expansion of the program to screen all housing clients for fair housing issues. Screening tools and other

materials created will be used all over the service area. (When completed, materials will be sent to HUD for approval.) Training materials are reviewed yearly to ensure effectiveness. Initial training is a one and one-half hour session to ready people to do rental testing. More training is needed to gain the skills to do realty or financial tests. Proper completion of testing paperwork is stressed in training to ensure validity of testing. Recruitment and tester training is ongoing so the Center always has a skilled, diverse pool of testers. The SOW calls for 10 tester trainings to be held in FY 2009-2010, which will train 100 testers, including some current testers who take added training to be able to do realty and/or financial testing. Data regarding the testing program, lists of testers, testing assignments, and test results, are tracked using MS Excel. The Program Coordinator supervises the testing program.

The Center uses paired testing. One tester represents the protected class for which discrimination is being tested and a second person serves as a control. An attempt is made to have testers be as alike as possible so only one variable is tested. If a test shows evidence of inequity, another test is done. If repeat tests also show evidence of bias, an enforcement complaint is filed with HUD or the Michigan Department of Civil Rights, as fitting. All tests are entered in a computerized Enforcement Log. Each record lists details of complaints, dates, protected basis of complaints, the issue, test type, and number of tests used to investigate each allegation, respondent type and test results, time for case processing including judicial or administrative or proceedings, cost of testing activities and case processing, to whom the case was referred, and resolution or type of relief sought and received. Complaint-based testing, whether done in the Center's service area or in the other 10 counties in LSEM's service area, is addressed using this same methodology.

Testing Coordinators give test results to the Fair Housing Attorneys and Program Coordinator as tests are completed. The Program Coordinator and Attorneys together handle complaints. Attorneys analyze test results, investigate complaints, do record keeping, refer to HUD, i.e. draft and review complaints before filing with HUD, and conduct conciliation negotiations. The Program Coordinator delivers any training required as part of conciliation settlements. To assure accountability, the Executive Director helps with complaint investigation as needed and reviews and signs all complaints and conciliation agreements filed with HUD. In his absence, the Deputy Director

signs conciliation agreements to avoid processing delays. If an FHIP funded complaint is settled with conciliation resulting in moneys being paid to LSEM, that money, after HUD approval, is reinvested in Center activities, per HUD guidelines. The Director of Litigation and Executive Director help Attorneys with fair housing litigation. Monthly, Directing Attorneys review Attorney casework to see that it meets quality standards set out in LSEM's Legal Work Reference Guide. The Program Coordinator oversees the work of skilled support staff that assist with service delivery from initial screening at client intake through preparation of work products.

The testing method described above remains constant whether the Center is conducting survey or complaint-based testing. Survey tests are randomly conducted to monitor the level of possible housing inequity in an area. If repeated survey tests show evidence of discrimination, the Center becomes the complainant and refers the matter to HUD. Per the SOW, during FY 2009-2010, LSEM will: 1) conduct a minimum of 245 paired tests of rental sites, realtors, and financial institutions (including both survey and complaint-based tests) in the Center's four-county service area, 2) submit to HUD at least 25 enforcement proposals generated by complaint or survey testing, and 3) reach a minimum of 15 conciliations. The Center will also conduct a minimum of one targeted investigation per Center site. Work with community partners is often the catalyst for the scope of work for such projects, i.e. ongoing work with the Disability Network resulted in parking assessment projects in public housing and later at municipal buildings. Such projects are part of an ongoing effort to increase housing accessibility for the disabled, the protected class that after race, suffers the most discrimination as seen in Center test results (Factor 2).

Center staff will get 120 hours of training a year or a minimum of 25 hours per person to improve skills and assure that the subscribed testing methodology is met. The Director of Litigation and Training links staff to training options. At a minimum, staff attends mandated HUD training. This year staff also attended the National Fair Housing Alliance Conference and the John Marshall sponsored training, "Fair Housing in a Time of Crisis." Quarterly, the Program Coordinator holds training attended by LSEM staff and fair housing staff of the Legal Aid and Defender Fair Housing Center (serving Oakland and Macomb Counties). This training hones the skills of both staffs, gives them an opportunity to exchange ideas, and provides a unique regional approach to fair housing.

The Center's goals (as stated in the SOW) of recruiting testers and generating complaints are promoted by advertising, development and distribution of educational material, presentations, and relationship building with grass roots and faith-based entities as well as MSIs. Quarterly advertising campaigns use electronic and print media. As possible, the Center uses public television and other means to promote its efforts at no cost. The main educational tools (other than tester training materials) used by the Center are 1) "Housing Discrimination Is More Than A Black Or White Issue" and 2) "A Fair Housing Guide For Reasonable Accommodation and Modification." One of these brochures is now available in Spanish; efforts to reach LEP populations will be expanded. To raise awareness of discrimination two posters are also used; one deals solely with disabilities. These materials are HUD approved. Staff annually reviews and updates materials to ensure their quality. Staff also reviews existing HUD material to decide if any of it should be incorporated into the Center's educational program. Materials are then revised and sent to HUD for approval. Revised materials will be used to reach the Center's educational goals for FY 2009-2010. At least 10 presentations will be given for a minimum of 200 persons. (To adhere to HUD rules, LSEM does not conduct educational programs for any entity or person the Center has tested in the previous 12 months, unless as part of a mediated HUD settlement.) Audiences for presentations vary. This year the Center did presentations for students and faculty of four MSIs. In FY 2009-2010 LSEM will expand the number of MSIs for which it conducts presentations. Another audience for educational efforts is domestic violence survivors. This population may be in homeless shelters or need to change residences. Their status as having been abused often results in survivors being discriminated against in efforts to find housing. This year LSEM educated residents of the Underground Women's Shelter in Saginaw on housing rights. The Center will expand this work in the coming year by working with the four shelters it serves through its VAWA grant. A minimum of 1,000 pieces of educational material will be distributed via presentations or by community agencies with which the Center has working relationships.

The Center's ability to generate referrals is based largely on its positive working relationships with community and faith-based agencies that also serve protected classes. This is done, in part, by signing formal working agreements with such agencies. With one quarter of FY 2008-2009 left, the Center has already met its goal of

signing eight such agreements. Examples include: FACED Inc., a coalition of churches; the Spanish Speaking Information Center; and the Genesee County Landlord Association. In FY 2009-2010 the SOW again set the goal of signing working agreements with eight such agencies, with at least three being new entities. By building positive working relationships with a variety of community agencies the Center gains proactive partners that will support fair housing in their communities and help achieve the goals listed in the SOW and help meet HUD priorities.

The Center expands its ability to reach protected classes and build support for its efforts through three Advisory Boards. Because of their unique fair housing issues Genesee County and Midland County each has a separate group. The third group combines Saginaw and Bay Counties due to the like fair housing issues facing these communities. Genesee and Midland Counties have unique issues that necessitate separate groups. Groups include representatives of all protected classes and/or agencies serving them; the local HUD office; local government officials; and others which not only give input, but also offer another measure of accountability for the Center's work.

Accountability for the Center's work is provided mainly by the reporting done by the Deputy Director, who serves as Grants Manager, and the Controller. Together they maintain general and fiscal oversight. They file all HUD activity and financial reports quarterly and issue a final report within 90 days of the end of the fiscal year. LSEM's past HUD evaluations of perfect 100's reveal the quality of the Center's work.

c. Budget Form and the Budget Information (10 points)

The total program Budget is \$357,354. Of that total, HUD's portion is \$258,577. The Budget was developed to include support for sufficient staffing and operational costs that are necessary and reasonable to meet program goals listed in the SOW. LSEM has shown the capacity to manage grant funds efficiently and cost-effectively so the most resources possible are used for direct service. LSEM's Accounting Manual lays out a strict set of standards on how moneys are handled as well as checks and balances that ensure funds are appropriately managed. LSEM's fiscal integrity is also maintained by having an independent audit including an A-133 Review, completed annually. For over 15 years LSEM has had no findings on its audits. LSEM also has an impressive track record of financial accountability with individual funders, including HUD.

Rating Factor 4: Leveraging Resources (up to 5 points)

Beginning in 1995 with the hiring of a Director of Development, Legal Services of Eastern Michigan (LSEM) has actively worked on diversifying its funding base, to build greater financial stability for its free civil legal service programs. In 1995 about 90% of LSEM's funding came from a single source, the Federal Legal Services Corporation (LSC). While LSC is still the firm's largest single funder, less than half (47%) of LSEM's 2009 \$2,832,704 budget comes from LSC. LSEM currently receives over 20 different grants, many of which come from Federal sources. LSEM has also received funding for special projects. Currently, LSEM has a fee for service contract with the City of Bay City to conduct a five-year rolling Impediments to Fair Housing Study.

To provide an ongoing revenue stream, insulated from grant dependency, the firm received a special grant from the C.S. Mott Foundation to buy a building in Flint. The facility houses LSEM's administrative offices as well as its Flint based legal service programs, including one of its fair housing sites. Ownership of the building reduces LSEM's overall operating expenses, and rental income derived from portions of the facility it does not occupy help support its delivery of direct legal services.

New funding is continuously pursued to further diversify LSEM's support base. Examples include the LSEM's 2008 receipt of Violence Against Women's Act moneys to provide legal representation for domestic violence survivors. This work puts LSEM in touch with a population that is potentially victimized by housing discrimination. LSEM is also preparing a private foundation grant to secure added support for its regular family law program. Additionally, LSEM has a pending award from the City of Flint funded through settlement of a suit by the State Attorney General against the nation's largest mortgage lender due to having engaged in predatory practices. This award, when received, will be used to help provide foreclosure prevention services. These are examples of LSEM's continued efforts to diversify funding for its services thus strengthening its support base.

In 1997 Legal Services of Eastern Michigan initiated the Genesee County Fair Housing Center with a two-year grant from the Charles Stewart Mott Foundation. At that time this grant was the sole source of funding for delivery of LSEM's fair housing services. Mott Foundation funding allowed LSEM to gain the needed experience in testing and

enforcement activities that made it eligible to apply for an U.S. Housing and Urban Development (HUD) grant to continue its fair housing work in Genesee County. In 2000 LSEM applied for and received a HUD grant as well as securing funding from both the City of Flint and Genesee County. The two government entities signed five-year agreements to provide funding to match HUD moneys on a decreasing basis. These moneys were used for some testing and enforcement, limited education, advertising, and operations as well as activities that could not be funded under HUD such as research projects that have been used to better focus testing efforts. Both municipalities fulfilled their five-year commitment, and the County continues to support the Center today.

While LSEM's fair housing efforts started in Genesee County, it was evident that housing discrimination existed throughout LSEM's 14 county service area. LSEM identified the greatest need, outside of Genesee County, for these services to be in the Tri-County area composed of Bay, Saginaw, and Midland Counties. (See Rating Factor 2) That area had once been served by its own fair housing center, which went defunct in the late 1990's, leaving an unmet need for fair housing services. LSEM attempted to fill that gap by applying to HUD for additional funding to expand its efforts into the Tri-County area. In March of 2004 LSEM received added HUD funds and implemented this expansion. The Center then became known as the Fair Housing Center of Eastern Michigan and initiated fair housing programming on a regional basis. LSEM used HUD moneys to leverage other local government support. The first municipality in the Tri-County area to provide the Center financial support was the City of Bay City, and that commitment has been ongoing since 2004. The City of Midland and Midland County contracted with LSEM to conduct an Impediments to Fair Housing Study, which was completed in 2005. That Study later served as the catalyst for a one-year contract to conduct targeted testing and enforcement to further identify the scope of the fair housing problem existing in the area.

In determining leveraging for this grant request, it has been assumed that the HUD grant year will begin November 15, 2009. Given that entities supporting the Center have differing fiscal years, it is difficult to calculate a precise amount each will supply during HUD's fiscal year. The leveraging letters submitted verify an amount that equals the total grant being awarded by each funding source during its fiscal year as well as the amount that will be

available during the HUD PEI fiscal year of November 15, 2009 – September 30, 2010. As appropriate, leveraging amounts have been decreased from actual awards to amounts of money equal to the portion of the entity's fiscal year that coincides with the assumptions made about the starting and ending dates of the HUD fiscal year. All confirmations of leveraging have been faxed.

For a decade, Genesee County has partnered with LSEM to offer fair housing services. The County's fiscal year is from May 1, 2009 through April 30, 2010. LSEM has already received notification of its current award of \$34,657. Of this total amount [REDACTED] will be used as leveraging, because that is the amount available during the portion of the County's fiscal year that coincides with the HUD grant period. County moneys will be used for testing and enforcement activities to curb housing discrimination and provide accommodations for the disabled as well as addressing poverty issues that will increase accessibility to safe, affordable housing. All of this work meets national HUD goals and priorities. In addition to these efforts, County support will be used for advertising, outreach, and research that are not funded by HUD. Genesee County funds will be used to provide fair housing activities exclusively within the County.

Ever since the Fair Housing Center expanded to the Tri-County area, the City of Bay City has actively partnered in its provision of fair housing services. Bay City has granted Community Development Block Grant funding to the Fair Housing Center every year since 2004. The 2009-2010 grant award is for \$8,000, which covers the City's July 1, 2009 – June 30, 2010 fiscal year. Of that \$8,000 [REDACTED] will be available for leveraging during HUD's fiscal year. As in Genesee County, City funds will be used to provide activities such as testing and enforcement that further the Center's goals as well as those of HUD. All of the CDBG funding that the City of Bay City provides will be used to address housing discrimination issues exclusively within the City limits. Also, LSEM has a contract with the City, \$1,500 per year for five years, to conduct a continuing Impediments Study. While this contract cannot be used as leveraging for this application, it demonstrates the staunch pledge the City has made to address fair housing in its area.

In addition to municipal support, LSEM expects to generate a minimum of \$7,500 in program income. Program income includes money produced from conciliations, site assessments, and trainings associated with conciliations arrived at through use of Fair Housing Initiative Program (FHIP) and non-FHIP funding. All such program income received as a result of expenditure of FHIP funds is reinvested into provision of fair housing services as required under HUD rules. Based on past experience, the [REDACTED] estimate of revenue to be earned by the Center during FY 2009-2010 is realistic. If program income tops [REDACTED] any excess will also be invested in delivery of fair housing services. If LSEM fails to receive the expected [REDACTED] in program income, the difference between the amount earned and the [REDACTED] will be taken from other LSEM funds. A letter from the President of Legal Services of Eastern Michigan's Board of Directors offers the Board's assurance that program income of a minimum of [REDACTED] received as a result of FHIP funding for the coming fiscal year will be reinvested into Center activities. Program income can be used, without restriction, to provide fair housing activities throughout the Center's service area.

Further leverage for this grant will be provided by the Center for Civil Justice (CCJ). Annually, CCJ subcontracts with LSEM to provide basic legal services to the 14 county area to which both entities deliver service. CCJ is allowing LSEM to use a portion of that funding as leveraging for its HUD fair housing grant request. These moneys will be used to partially fund salaries and benefits for two Housing Attorneys one in the Midland office and one in the Port Huron office as well as one Paralegal in the Saginaw office to screen for fair housing issues while they handle clients' general housing needs. In the Flint office this task will be performed by the full-time Fair Housing Testing Coordinator (see Rating Factors 1 and 3). These housing advocates have been trained in fair housing issues so they will be able to identify those clients who may be victimized by subtle discriminatory practices that the clients themselves do not recognize. The advocates will use a screening tool specifically developed to better spot individuals with potential fair housing complaints that would otherwise go unaddressed. CCJ funds will also be used to help support supervisory activities and needed assistance of support staff. A letter from Ms. Terri Stangl, Executive Director of CCJ, is included, to substantiate this agreement. The funding LSEM receives from CCJ is not Federal in origin. Rather, it is Filing Fee moneys provided through a grant from the Michigan State Bar Foundation.

CCJ's 2009 grant award to LSEM is \$364,887, which covers its January 1, 2009 – December 31, 2009 fiscal year. The largest portion of that grant amount is received by LSEM in the last quarter of each fiscal year. Of the \$364,887, [REDACTED] will be available for leveraging for fair housing during HUD's October 1, 2008 – September 30, 2009 grant year. Since CCJ and LSEM have the same 14 county service area, LSEM has the flexibility to use CCJ funds to serve clients anywhere in the Center's service area.

The total leveraging that has already been committed to this project is as follows:

Genesee County - [REDACTED]

City of Bay City - [REDACTED]

The Center for Civil Justice - [REDACTED]

Program Income - [REDACTED]

Together these sources equal [REDACTED] of leveraging or [REDACTED] of the total project cost of [REDACTED]. The remainder of the total program costs of \$258,577 is requested from HUD.

The main reason for LSEM's success in leveraging fair housing dollars has been relationship building. That relationship building started in 1996 when LSEM staff was asked to participate in a group reviewing the research being done by [REDACTED] for inclusion in an Impediments to Fair Housing Study. For 18 months LSEM staff met with others in the Study group: the City of Flint and Genesee County officials; representatives of other non-profit organizations, i.e. the Urban League; representatives of the Association of Townships; etc. Culmination of [REDACTED] research and input of the group was the 1998 publication of the Impediments Study, which included as one of its recommendations establishment of an independent Fair Housing Center. LSEM's cooperation with the City and County in completion of the Study built the municipalities' confidence in LSEM's ability to form a Fair Housing Center and laid the foundation for them to become financial partners in the effort. These positive relationships are maintained by LSEM's ongoing involvement in County sponsored quarterly fair housing meetings of all municipalities in the County. The Center also works with the City on implementation of its annual fair housing

conference. Also, both entities serve on LSEM's Fair Housing Advisory Committee. Additionally, LSEM works with these governmental entities in the Flint/Genesee County Continuum of Care.

In 2005 Genesee County chose to have LSEM update its five year old Impediments Study. (See Rating Factor 2) LSEM conducted and compiled all of the research and wrote drafts of each section of the Study, and, as completed, sent them to the County for review. This made the completed Study a collaborative effort that was inclusive of all components that both LSEM and the County felt were needed to provide a comprehensive study. The cooperative process established in preparation of the Impediments Study resulted in the County requesting LSEM to do additional research projects for the County. The most recently completed of these is the "Analysis of Municipality Parking Compliance in Genesee County, 2008".

While Genesee County continues to supply leveraging and moneys for research, the City of Flint's large budget deficit forced an end to its support of the Center in FY 2008-2009. Lack of continuity in leadership, three Mayors in less than six months, has also contributed to financial support for the Center ending. The City has continued some limited in-house fair housing educational services through its Human Relations Office, and the Center continues to cooperate with the City on the activities it initiates, i.e. the fair housing conferences mentioned above. The need for testing and enforcement activities in the City is critical and this work is now paid for with HUD funding. This will continue to be the case until such time that City support can be reestablished.

LSEM's ongoing relationship with City of Bay City began when both entities attended Continuum of Care (CoC) meetings. In an effort to explore any possible link between homelessness and housing discrimination the CoC invited LSEM's Executive Director to make a presentation on fair housing issues and what indicators of possible segregation and/or discrimination might exist in their City. The presentation was the impetus for building positive relationships with the Public Housing Authority and City officials. Involvement with the City grew when LSEM was hired to conduct an updated Impediments Study. City officials responded to this proof of an ongoing housing inequity problem in their community by awarding the Center a CDBG grant to support testing, enforcement, and outreach/education efforts. This Bay City grant was the onset of local support for restoration of fair housing services

to the area that had, until a decade ago, been supplied by the Tri-County Fair Housing Center. The award also helped the Center leverage HUD dollars to expand services in this area. The continuing work on a new Impediments Study is an example of how productive LSEM's relationship with the City of Bay City is in addressing fair housing issues within its jurisdiction.

In 2006 the Center began to develop the same type of positive relationship with Midland County and City of Midland officials. The City of Midland and Midland County contracted with the Center to research and publish updated Impediments to Fair Housing Study. The final scope of the Study was developed cooperatively between the City, County, and the LSEM researcher. As in the Genesee County process, LSEM completed research and writing of sections of the Study, and referred them to the municipal leaders for review. Such reviews provided government officials with a feeling of ownership of the results of the Study and developed a commitment on their part to address the issues surfacing in the Study. Since the number of minorities and other protected classes living in the County were small, government officials and most residents had long denied that discrimination existed in their community. But when Study results demonstrated that in spite of the small numbers of protected classes living in the area, the majority of them lived within the City limits, governmental officials accepted the findings, and have started to address the problems that have been identified. Municipal officials did not hide results of the Study. Instead, officials created community awareness of the issue by holding a press conference to share the Study results. The Center later entered into a year long contract to do limited testing and enforcement to target the areas in the community where discrimination was the most widespread.

LSEM is still in the process of relationship building with City of Saginaw and Saginaw County officials. Strategies similar to those used elsewhere are being tried in the Saginaw area in hope of securing the same positive results achieved in other communities. The City contracted with a private consulting firm to update its Impediments Study. However the Study was limited in scope. The fact that it concentrated primarily upon Blacks living in the City of Saginaw only, makes it difficult to draw any global conclusions regarding levels of discrimination for all protected classes throughout the area. However, LSEM will continue to make overtures to working with the

City to expand its view of housing discrimination and how to address it. LSEM will also work with Saginaw County and Saginaw Township officials in an attempt to create a greater awareness of the scope of the discrimination problems in the County that LSEM has identified through its own limited research and testing results as outlined in Rating Factor 2. One example of a strategy that will be implemented is to build on the relationships LSEM has developed through its past contribution to the City/County Continuum of Care and participation in development of the Michigan State Housing Development Authority mandated Ten-Year Plan to End Homelessness. LSEM has already made presentations to the CoC regarding fair housing in the area and this may, in the future, provide the same entrée for examining how housing discrimination may be related to homelessness as occurred in Bay City. The Center will be working on relationship building in the Saginaw area throughout FY 2009-2010, which may result in some additional leveraging.

LSEM has an outstanding track record of being able to diversify funding for all of its legal programs, and the examples given here show how relationship building has increased its capacity to leverage funds, specifically for fair housing. During the next program year, LSEM will continue to both promote its existing relationships as well as cultivate new ones to further diversify its fair housing funding.

ATTACHMENTS FORM

Instructions: On this form, you will attach the various files that make up your grant application. Please consult with the appropriate Agency Guidelines for more information about each needed file. Please remember that any files you attach must be in the document format and named as specified in the Guidelines.

Important: Please attach your files in the proper sequence. See the appropriate Agency Guidelines for details.

1) Please attach Attachment 1	HUD424cbw.xlsx	Add Attachment	Delete Attachment	View Attachment
2) Please attach Attachment 2	LSEM10Forms2990and2991.pdf	Add Attachment	Delete Attachment	View Attachment
3) Please attach Attachment 3	LSEM10Form2993.pdf	Add Attachment	Delete Attachment	View Attachment
4) Please attach Attachment 4	HUD2994-AYourAreOurClientSury	Add Attachment	Delete Attachment	View Attachment
5) Please attach Attachment 5	LSEM10logicmode196010PEI.xlsx	Add Attachment	Delete Attachment	View Attachment
6) Please attach Attachment 6	LSEM10RatingFactor1.doc	Add Attachment	Delete Attachment	View Attachment
7) Please attach Attachment 7	LSEM10RatingFactor2.doc	Add Attachment	Delete Attachment	View Attachment
8) Please attach Attachment 8	LSEM10RatingFactor3.docx	Add Attachment	Delete Attachment	View Attachment
9) Please attach Attachment 9	LSEM10RatingFactor4.doc	Add Attachment	Delete Attachment	View Attachment
10) Please attach Attachment 10	LSEM10RatingFactor5.docx	Add Attachment	Delete Attachment	View Attachment
11) Please attach Attachment 11	LSEM10SOW.docx	Add Attachment	Delete Attachment	View Attachment
12) Please attach Attachment 12	LSEM10budnarr.docx	Add Attachment	Delete Attachment	View Attachment
13) Please attach Attachment 13	LSEM10LeveragingLetters.pdf	Add Attachment	Delete Attachment	View Attachment
14) Please attach Attachment 14	LSEM0FairHousingStatement.doc	Add Attachment	Delete Attachment	View Attachment
15) Please attach Attachment 15	LSEM10ABSTRACT.doc	Add Attachment	Delete Attachment	View Attachment

Survey on Ensuring Equal Opportunity For Applicants

OMB No. 1890-0014 Exp. 2/28/2009

Purpose:

The Federal government is committed to ensuring that all qualified applicants, small or large, non-religious or faith-based, have an equal opportunity to compete for Federal funding. In order for us to better understand the population of applicants for Federal funds, we are asking nonprofit private organizations (not including private universities) to fill out this survey.

Upon receipt, the survey will be separated from the application. Information provided on the survey will not be considered in any way in making funding decisions and will not be included in the Federal grants database. While your help in this data collection process is greatly appreciated, completion of this survey is voluntary.

Instructions for Submitting the Survey

If you are applying using a hard copy application, please place the completed survey in an envelope labeled "Applicant Survey." Seal the envelope and include it along with your application package. If you are applying electronically, please submit this survey along with your application.

Applicant's (Organization) Name:	Legal Services of Eastern Michigan
Applicant's DUNS Name:	[REDACTED]
Federal Program:	Fair Housing Initiatives Programs (FHIP) - Private Enforcement Initiative (PEI)
CFDA Number:	14.418

- Has the applicant ever received a grant or contract from the Federal government?
 Yes No
- Is the applicant a faith-based organization?
 Yes No
- Is the applicant a secular organization?
 Yes No
- Does the applicant have 501(c)(3) status?
 Yes No
- Is the applicant a local affiliate of a national organization?
 Yes No
- How many full-time equivalent employees does the applicant have? (Check only one box).
 3 or Fewer 15-50
 4-5 51-100
 6-14 over 100
- What is the size of the applicant's annual budget? (Check only one box.)
 Less Than \$150,000
 \$150,000 - \$299,999
 \$300,000 - \$499,999
 \$500,000 - \$999,999
 \$1,000,000 - \$4,999,999
 \$5,000,000 or more

Survey Instructions on Ensuring Equal Opportunity for Applicants

OMB No. 1890-0014 Exp. 2/28/2009

Provide the applicant's (organization) name and DUNS number and the grant name and CFDA number.

1. Self-explanatory.
2. Self-identify.
3. Self-identify.
4. 501(c)(3) status is a legal designation provided on application to the Internal Revenue Service by eligible organizations. Some grant programs may require nonprofit applicants to have 501(c)(3) status. Other grant programs do not.
5. Self-explanatory.
6. For example, two part-time employees who each work half-time equal one full-time equivalent employee. If the applicant is a local affiliate of a national organization, the responses to survey questions 2 and 3 should reflect the staff and budget size of the local affiliate.
7. Annual budget means the amount of money your organization spends each year on all of its activities.

Paperwork Burden Statement

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this

information collection is **1890-0014**. The time required

to complete this information collection is estimated to average five (5) minutes per response, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection.

If you have any comments concerning the accuracy of the time estimate(s) or suggestions for improving this form, please write to: The Agency Contact listed in this grant application package.

America's Affordable Communities
Initiative

U.S. Department of Housing
and Urban Development

OMB approval no. 2510-0013
(exp. 03/31/2010)

* Organization Name:

Legal Services of Eastern Michigan

Questionnaire for HUD's Initiative on Removal of Regulatory Barriers

Part A. Local Jurisdictions. Counties Exercising Land Use and Building Regulatory Authority and Other Applicants Applying for Projects Located in such Jurisdictions or Counties [Collectively, Jurisdiction]

	1	2
1. Does your jurisdiction's comprehensive plan (or in the case of a tribe or TDHE, a local Indian Housing Plan) include a "housing element"? A local comprehensive plan means the adopted official statement of a legislative body of a local government that sets forth (in words, maps, illustrations, and/or tables) goals, policies, and guidelines intended to direct the present and future physical, social, and economic development that occurs within its planning jurisdiction and that includes a unified physical plan for the public development of land and water. If your jurisdiction does not have a local comprehensive plan with a "housing element," please enter no. If no, skip to question # 4.	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes
2. If your jurisdiction has a comprehensive plan with a housing element, does the plan provide estimates of current and anticipated housing needs, taking into account the anticipated growth of the region, for existing and future residents, including low, moderate and middle income families, for at least the next five years?	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes
3. Does your zoning ordinance and map, development and subdivision regulations or other land use controls conform to the jurisdiction's comprehensive plan regarding housing needs by providing: a) sufficient land use and density categories (multifamily housing, duplexes, small lot homes and other similar elements); and, b) sufficient land zoned or mapped "as of right" in these categories, that can permit the building of affordable housing addressing the needs identified in the plan? (For purposes of this notice, "as-of-right," as applied to zoning, means uses and development standards that are determined in advance and specifically authorized by the zoning ordinance. The ordinance is largely self-enforcing because little or no discretion occurs in its administration.). If the jurisdiction has chosen not to have either zoning, or other development controls that have varying standards based upon districts or zones, the applicant may also enter yes.	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes
4. Does your jurisdiction's zoning ordinance set minimum building size requirements that exceed the local housing or health code or is otherwise not based upon explicit health standards?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

<p>5. If your jurisdiction has development impact fees, are the fees specified and calculated under local or state statutory criteria? If no, skip to question #7. Alternatively, if your jurisdiction does not have impact fees, you may enter yes.</p>	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes
<p>6. If yes to question #5, does the statute provide criteria that sets standards for the allowable type of capital investments that have a direct relationship between the fee and the development (nexus), and a method for fee calculation?</p>	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes
<p>7. If your jurisdiction has impact or other significant fees, does the jurisdiction provide waivers of these fees for affordable housing?</p>	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes
<p>8. Has your jurisdiction adopted specific building code language regarding housing rehabilitation that encourages such rehabilitation through graded regulatory requirements applicable as different levels of work are performed in existing buildings? Such code language increases regulatory requirements (the additional improvements required as a matter of regulatory policy) in proportion to the extent of rehabilitation that an owner/developer chooses to do on a voluntary basis. For further information see HUD publication: "Smart Codes in Your Community: A Guide to Building Rehabilitation Codes" (www.huduser.org/publications/destech/smartcodes.html)</p>	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes
<p>9. Does your jurisdiction use a recent version (i.e. published within the last 5 years or, if no recent version has been published, the last version published) of one of the nationally recognized model building codes (i.e. the International Code Council (ICC), the Building Officials and Code Administrators International (BOCA), the Southern Building Code Congress International (SBCI), the International Conference of Building Officials (ICBO), the National Fire Protection Association (NFPA)) without significant technical amendment or modification? In the case of a tribe or TDHE, has a recent version of one of the model building codes as described above been adopted or, alternatively, has the tribe or TDHE adopted a building code that is substantially equivalent to one or more of the recognized model building codes?</p> <p>Alternatively, if a significant technical amendment has been made to the above model codes, can the jurisdiction supply supporting data that the amendments do not negatively impact affordability?</p>	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes
<p>10. Does your jurisdiction's zoning ordinance or land use regulations permit manufactured (HUD-Code) housing "as of right" in all residential districts and zoning classifications in which similar site-built housing is permitted, subject to design, density, building size, foundation requirements, and other similar requirements applicable to other housing that will be deemed reality, irrespective of the method of production?</p>	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes

<p>11. Within the past five years, has a jurisdiction official (i.e., chief executive, mayor, county chairman, city manager, administrator, or a tribally recognized official, etc.), the local legislative body, or planning commission, directly, or in partnership with major private or public stakeholders, convened or funded comprehensive studies, commissions, or hearings, or has the jurisdiction established a formal ongoing process, to review the rules, regulations, development standards, and processes of the jurisdiction to assess their impact on the supply of affordable housing?</p>	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes
<p>12. Within the past five years, has the jurisdiction initiated major regulatory reforms either as a result of the above study or as a result of information identified in the barrier component of the jurisdiction's "HUD Consolidated Plan?" If yes, attach a brief list of these major regulatory reforms.</p> <p><i>(If you have attachments that are electronic files please scroll to bottom of page 5 and attach. For information that is not in an electronic format use the eFax method. See the General Section Instructions for eFaxing.)</i></p>	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes
<p>13. Within the past five years has your jurisdiction modified infrastructure standards and/or authorized the use of new infrastructure technologies (e.g. water, sewer, street width) to significantly reduce the cost of housing?</p>	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes
<p>14. Does your jurisdiction give "as-of-right" density bonuses sufficient to offset the cost of building below market units as an incentive for any market rate residential development that includes a portion of affordable housing? (As applied to density bonuses, "as of right" means a density bonus granted for a fixed percentage or number of additional market rate dwelling units in exchange for the provision of a fixed number or percentage of affordable dwelling units and without the use of discretion in determining the number of additional market rate units.)</p>	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes
<p>15. Has your jurisdiction established a single, consolidated permit application process for housing development that includes building, zoning, engineering, environmental, and related permits? Alternatively, does your jurisdiction conduct concurrent, not sequential, reviews for all required permits and approvals?</p>	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes
<p>16. Does your jurisdiction provide for expedited or "fast track" permitting and approvals for all affordable housing projects in your community?</p>	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes
<p>17. Has your jurisdiction established time limits for government review and approval or disapproval of development permits in which failure to act, after the application is deemed complete, by the government within the designated time period, results in automatic approval?</p>	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes
<p>18. Does your jurisdiction allow "accessory apartments" either as: a) a special exception or conditional use in all single-family residential zones or, b) "as of right" in a majority of residential districts otherwise zoned for single-family housing?</p>	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes
<p>19. Does your jurisdiction have an explicit policy that adjusts or waives existing parking requirements for all affordable housing developments?</p>	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes
<p>20. Does your jurisdiction require affordable housing projects to undergo public review or special hearings when the project is otherwise in full compliance with the zoning ordinance and other development regulations?</p>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<p>Total Points:</p>		

**Part B. State Agencies and Departments or Other Applicants for Projects Located in
Unincorporated Areas or Areas Otherwise Not Covered in Part A**

	1	2
1. Does your state, either in its planning and zoning enabling legislation or in any other legislation, require localities regulating development have a comprehensive plan with a "housing element?" If no, skip to question # 4	<input type="checkbox"/> No	<input type="checkbox"/> Yes
2. Does your state require that a local jurisdiction's comprehensive plan estimate current and anticipated housing needs, taking into account the anticipated growth of the region, for existing and future residents, including low, moderate, and middle income families, for at least the next five years?	<input type="checkbox"/> No	<input type="checkbox"/> Yes
3. Does your state's zoning enabling legislation require that a local jurisdiction's zoning ordinance have a) sufficient land use and density categories (multifamily housing, duplexes, small lot homes and other similar elements); and, b) sufficient land zoned or mapped in these categories, that can permit the building of affordable housing that addresses the needs identified in the comprehensive plan?	<input type="checkbox"/> No	<input type="checkbox"/> Yes
4. Does your state have an agency or office that includes a specific mission to determine whether local governments have policies or procedures that are raising costs or otherwise discouraging affordable housing?	<input type="checkbox"/> No	<input type="checkbox"/> Yes
5. Does your state have a legal or administrative requirement that local governments undertake periodic self-evaluation of regulations and processes to assess their impact upon housing affordability address these barriers to affordability?	<input type="checkbox"/> No	<input type="checkbox"/> Yes
6. Does your state have a technical assistance or education program for local jurisdictions that includes assisting them in identifying regulatory barriers and in recommending strategies to local governments for their removal?	<input type="checkbox"/> No	<input type="checkbox"/> Yes
7. Does your state have specific enabling legislation for local impact fees? If no skip to question #9.	<input type="checkbox"/> No	<input type="checkbox"/> Yes
8. If yes to the question #7, does the state statute provide criteria that sets standards for the allowable type of capital investments that have a direct relationship between the fee and the development (nexus) and a method for fee calculation?	<input type="checkbox"/> No	<input type="checkbox"/> Yes
9. Does your state provide significant financial assistance to local governments for housing, community development and/or transportation that includes funding prioritization or linking funding on the basis of local regulatory barrier removal activities?	<input type="checkbox"/> No	<input type="checkbox"/> Yes

<p>10. Does your state have a mandatory state-wide building code that a) does not permit local technical amendments and b) uses a recent version (i.e. published within the last five years or, if no recent version has been published, the last version published) of one of the nationally recognized model building codes (i.e. the International Code Council (ICC), the Building Officials and Code Administrators International (BOCA), the Southern Building Code Congress International (SBCI), the International Conference of Building Officials (ICBO), the National Fire Protection Association (NFPA)) without significant technical amendment or modification?</p> <p>Alternatively, if the state has made significant technical amendment to the model code, can the state supply supporting data that the amendments do not negatively impact affordability?</p>	<input type="checkbox"/> No	<input type="checkbox"/> Yes
<p>11. Has your jurisdiction adopted specific building code language regarding housing rehabilitation that encourages such rehabilitation through graduated regulatory requirements applicable as different levels of work are performed in existing buildings? Such code language increases regulatory requirements (the additional improvements required as a matter of regulatory policy) in proportion to the extent of rehabilitation that an owner/developer chooses to do on a voluntary basis. For further information see HUD publication: "Smart Codes in Your Community: A Guide to Building Rehabilitation Codes" (www.huduser.org/publications/destech/smartcodes.html)</p>	<input type="checkbox"/> No	<input type="checkbox"/> Yes
<p>12. Within the past five years has your state made any changes to its own processes or requirements to streamline or consolidate the state's own approval processes involving permits for water or wastewater, environmental review, or other State-administered permits or programs involving housing development? If yes, briefly list these changes.</p> <p><i>(If you have attachments that are electronic files please scroll to bottom of this page and attach. For information that is not in an electronic format use the eFax method. See the General Section Instructions for eFaxing.)</i></p>	<input type="checkbox"/> No	<input type="checkbox"/> Yes
<p>13. Within the past five years, has your state (i.e., Governor, legislature, planning department) directly or in partnership with major private or public stakeholders, convened or funded comprehensive studies, commissions, or panels to review state or local rules, regulations, development standards, and processes to assess their impact on the supply of affordable housing?</p>	<input type="checkbox"/> No	<input type="checkbox"/> Yes
<p>14. Within the past five years, has the state initiated major regulatory reforms either as a result of the above study or as a result of information identified in the barrier component of the states' "Consolidated Plan submitted to HUD?" If yes, briefly list these major regulatory reforms.</p> <p><i>(If you have attachments that are electronic files please scroll to bottom of this page and attach. For information that is not in an electronic format use the eFax method. See the General Section Instructions for eFaxing.)</i></p>	<input type="checkbox"/> No	<input type="checkbox"/> Yes
<p>15. Has the state undertaken any other actions regarding local jurisdiction's regulation of housing development including permitting, land use, building or subdivision regulations, or other related administrative procedures? If yes, briefly list these actions.</p> <p><i>(If you have attachments that are electronic files please scroll to bottom of this page and attach. For information that is not in an electronic format use the eFax method. See the General Section Instructions for eFaxing.)</i></p>	<input type="checkbox"/> No	<input type="checkbox"/> Yes
<p>Total Points:</p>		

Additional Information:

Add Attachment

Delete Attachment

View Attachment

Close Form

Grant Applications Detailed Budget

U.S. Department of Housing and Urban Development

Print Page

About

OMB Approval No. 2501-0017 (expires 01/31/2008)

* Organization Name: Legal Services of Eastern Michigan
* Project/Activity Name: Fair Housing Center of Eastern Michigan

Table with columns: HUD Share (\$), Applicant Match (\$), Other HUD Funds (\$), Other Fed Share (\$), State Share (\$), Local/Tribal Share (\$), Other Share (\$), Program Income (\$), Total (\$). Rows include categories like Personnel, Fringe Benefits, Travel, Equipment, Supplies, Contractual, Construction, Administration and Legal Expenses, etc.

Next Year

Tracking Number: GRANT10420810

**Grant Applications
Detailed Budget**

U.S. Department of Housing
and Urban Development

Print Page

About

OMB Approval No. 2501-0017
(expires 01/31/2008)

* Organization Name:

Legal Services of Eastern Michigan

* Project/Activity Name:

Fair Housing Center of Eastern Michigan

	Functional Categories										All Years
	Year 1:	Year 2:	Year 3:	Year 4:	Year 5:	Year 6:	Year 7:	Year 8:	Year 9:	Year 10:	
	Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10	Column 11
	HUD Share (\$)	Applicant Match (\$)	Other HUD Funds (\$)	Other Fed Share (\$)	State Share (\$)	Local/Tribal Share (\$)	Other Share (\$)	Program Income (\$)	Total (\$)		
a. Personnel (Direct Labor)											
b. Fringe Benefits											
c. Travel											
d. Equipment (only items > \$5,000 depreciated value)											
e. Supplies (only items < \$5,000 depreciated value)											
f. Contractual											
g. Construction											
1. Administration and Legal Expenses											
2. Land, Structures, Rights-of-Way, Appraisals, etc.											
3. Relocation Expenses and Payments											
4. Architectural and Engineering Fees											
5. Other Architectural and Engineering Fees											
6. Project Inspection Fees											
7. Site Work											
8. Demolition and Removal											
9. Construction											
10. Equipment											
11. Contingencies											
12. Miscellaneous											
h. Other Direct Costs											
i. Subtotal of Direct Costs											
j. Indirect Costs (% Approved Indirect Cost Rate: <input type="text"/> %)											
Grand Total (Year <input type="text"/> 2):											
Grand Total (All Years):											

Previous Year Next Year

Tracking Number: GRANT10420810

Funding Opportunity Number: FR-5300-N-10 Received Date: 2009-09-17 11:00:29 AM
Form HUD-424-CB (1/2004)

357,354.00

Close Form

Print Page

About

U.S. Department of Housing and Urban Development

OMB Approval No. 2501-0017 (expires 01/31/2008)

Organization Name: Legal Services of Eastern Michigan
Project Activity Name: Fair Housing Center of Eastern Michigan

Table with columns: HUD Share (\$), Applicant Match (\$), Other HUD Funds (\$), State Share (\$), Local/Tribal Share (\$), Other Share (\$), Program Income (\$), Total (\$). Rows include categories like Personnel, Fringe Benefits, Equipment, Supplies, Contracting, Construction, Administration, Land/Structures, Renovation, Architectural, Other Architectural, Project Inspection Fees, Site Work, Demolition, Construction, Equipment, Contingencies, Miscellaneous, Other Direct Costs, Subtotal of Direct Costs, Indirect Costs, Grand Total (Year 3), Grand Total (All Years).

Previous Year Next Year

357,354.00

U.S. Department of Housing and Urban Development

OMB Approval No. 2501-0017 (expires 01/31/2008)

* Organization Name: Legal Services of Eastern Michigan

* Project/Activity Name: Fair Housing Center of Eastern Michigan

Functional Categories	Year 1: <input type="checkbox"/> Year 2: <input type="checkbox"/> Year 3: <input type="checkbox"/> All Years: <input checked="" type="checkbox"/>							Column 8 Program Income (\$)	Column 9 Total (\$)
	Column 1 HUD Share (\$)	Column 2 Applicant Match (\$)	Column 3 Other HUD Funds (\$)	Column 4 Other Fed Share (\$)	Column 5 State Share (\$)	Column 6 Local/Tribal Share (\$)	Column 7 Other Share (\$)		
a. Personnel (Direct Labor)									
b. Fringe Benefits									
c. Travel									
d. Equipment (only items > \$5,000 depreciated value)									
e. Supplies (only items < \$5,000 depreciated value)									
f. Contractor									
g. Construction									
1. Administration and Legal Expenses									
2. Land, Structures, Rights-of-Way, Appraisals, etc.									
3. Relocation Expenses and Payments									
4. Architectural and Engineering Fees									
5. Other Architectural and Engineering Fees									
6. Project Inspection Fees									
7. Site Work									
8. Demolition and Removal									
9. Construction									
10. Equipment									
11. Contingencies									
12. Miscellaneous									
n. Other Direct Costs									
i. Subtotal of Direct Costs									
j. Indirect Costs (% Approved Indirect Cost Rate <input type="text"/> %)									
Grand Total (Year <input type="text"/> All <input type="text"/>)									
Grand Total (All Years)									

Previous Year

357,354.00

**Applicant/Recipient
Disclosure/Update Report**

U.S. Department of Housing
and Urban Development

OMB Approval No. 2510-0011
(exp. 08/31/2009)

Applicant/Recipient Information

* Duns Number: 021843792

* Report Type: INITIAL

1. Applicant/Recipient Name, Address, and Phone (include area code):

* Applicant Name:

Legal Services of Eastern Michigan

* Street1: 436 S. SAGINAW STREET

Street2:

* City: Flint

County: GENESEE

* State: MI: Michigan

* Zip Code: 48502

* Country: USA: UNITED STATES

* Phone: 810-234-2621

2. Social Security Number or Employer ID Number: 38-1958131

* 3. HUD Program Name:

Private Enforcement Initiatives

* 4. Amount of HUD Assistance Requested/Received: \$ 258,577.00

5. State the name and location (street address, City and State) of the project or activity:

* Project Name: Fair Housing Center of Eastern Michigan

* Street1: Legal Services of Eastern Michigan

Street2: 436 S. Saginaw Street

* City: Flint

County: Genesee

* State: MI: Michigan

* Zip Code: 48502

* Country: USA: UNITED STATES

Part I Threshold Determinations

* 1. Are you applying for assistance for a specific project or activity? These terms do not include formula grants, such as public housing operating subsidy or CDBG block grants. (For further information see 24 CFR Sec. 4.3).

Yes No

* 2. Have you received or do you expect to receive assistance within the jurisdiction of the Department (HUD), involving the project or activity in this application, in excess of \$200,000 during this fiscal year (Oct. 1-Sep. 30)? For further information, see 24 CFR Sec. 4.9

Yes No

If you answered " No " to either question 1 or 2, **Stop!** You do not need to complete the remainder of this form.

However, you must sign the certification at the end of the report.

Part II Other Government Assistance Provided or Requested / Expected Sources and Use of Funds.

Such assistance includes, but is not limited to, any grant, loan, subsidy, guarantee, insurance, payment, credit, or tax benefit.

Department/State/Local Agency Name:

* Government Agency Name:

Housing and Urban Development, FHIP - PEI

Government Agency Address:

* Street1: 451 7th Street, SW., Room 3156

Street2:

* City: Washington

County:

* State: DC: District of Columbia

* Zip Code: 20410-5000

* Country: USA: UNITED STATES

* Type of Assistance: FHIP - PEI

* Amount Requested/Provided: \$ 258,577.00

* Expected Uses of the Funds:

To operate a Fair Housing Center

Department/State/Local Agency Name:

* Government Agency Name:

Government Agency Address:

* Street1:

Street2:

* City:

County:

* State:

* Zip Code:

* Country:

* Type of Assistance:

* Amount Requested/Provided: \$

* Expected Uses of the Funds:

(Note: Use Additional pages if necessary.)

Add Attachment

Delete Attachment

View Attachment

Part III Interested Parties. You must decide.

1. All developers, contractors, or consultants involved in the application for the assistance or in the planning, development, or implementation of the project or activity and

2. Any other person who has a financial interest in the project or activity for which the assistance is sought that exceeds \$50,000 or 10 percent of the assistance (whichever is lower).

* Alphabetical list of all persons with a reportable financial interest in the project or activity (For individuals, give the last name first)	* Social Security No. or Employee ID No.	* Type of Participation in Project/Activity	* Financial Interest in Project/Activity (\$ and %)
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %

(Note: Use Additional pages if necessary.)

Add Attachment

Delete Attachment

View Attachment

Certification

Warning: If you knowingly make a false statement on this form, you may be subject to civil or criminal penalties under Section 1001 of Title 18 of the United States Code. In addition, any person who knowingly and materially violates any required disclosures of information, including intentional non-disclosure, is subject to civil money penalty not to exceed \$10,000 for each violation. I certify that this information is true and complete.

* Signature:

Teresa Trantham

* Date: (mm/dd/yyyy)

09/17/2009

Facsimile Transmittal

U. S. Department of Housing and Urban Development
Office of Department Grants Management and Oversight

OMB Approval No. 2525-0118
exp. Date (5/30/2008)

1248445220-1437

* Name of Document Transmitting: Support Information for HUD 27300 Questionnaire

1. Applicant Information:

* Legal Name: Legal Services of Eastern Michigan
* Address:
* Street1: 436 S. SAGINAW STREET
Street2:
* City: Flint
County: GENESEE
* State: MI: Michigan
* Zip Code: 48502 * Country: USA: UNITED STATES

2. Catalog of Federal Domestic Assistance Number:

* Organizational DUNS: [redacted] CFDA No.: 14.418
Title: Private Enforcement Initiatives
Program Component:

3. Facsimile Contact Information:

Department:
Division:

4. Name and telephone number of person to be contacted on matters involving this facsimile.

Prefix: Ms. * First Name: Teresa
Middle Name: F.
* Last Name: Trantham
Suffix:
* Phone Number: 810-234-2621
Fax Number: 810-234-9039

* 5. Email: ctrantham@lseem-mi.org

* 6. What is your Transmittal? (Check one box per fax)

a. Certification b. Document c. Match/Leverage Letter d. Other

* 7. How many pages (including cover) are being faxed? 2

Application for Federal Assistance SF-424

Version 02

* 1. Type of Submission:

- Preapplication
- Application
- Changed/Corrected Application

* 2. Type of Application:

- New
- Continuation
- Revision

* If Revision, select appropriate letter(s):

[Empty field]

* Other (Specify)

[Empty field]

* 3. Date Received:

09/17/2009

4. Applicant Identifier:

[Empty field]

5a. Federal Entity Identifier:

38-1958131

* 5b. Federal Award Identifier:

[Empty field]

State Use Only:

6. Date Received by State:

[Empty field]

7. State Application Identifier:

[Empty field]

8. APPLICANT INFORMATION:

* a. Legal Name:

Legal Services of Eastern Michigan

* b. Employer/Taxpayer Identification Number (EIN/TIN):

38-1958131

* c. Organizational DUNS:

[Redacted]

d. Address:

* Street1:

436 S. SAGINAW STREET

Street2:

[Empty field]

* City:

Flint

County:

GENESEE

* State:

MI: Michigan

Province:

[Empty field]

* Country:

USA: UNITED STATES

* Zip / Postal Code:

48502

e. Organizational Unit:

Department Name:

[Empty field]

Division Name:

[Empty field]

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Ms.

* First Name:

TERESA

Middle Name:

F.

* Last Name:

TRANHAM

Suffix:

[Empty field]

Title:

DEPUTY DIRECTOR

Organizational Affiliation:

[Empty field]

* Telephone Number:

810-234-2621

Fax Number:

810-234-9039

* Email:

trantham@lem-mi.org

Application for Federal Assistance SF-424

Version 02

9. Type of Applicant 1: Select Applicant Type:

M: Nonprofit with 501C3 IRS Status (Other than Institution of Higher Education)

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

US Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.418

CFDA Title:

Private Enforcement Initiatives

*** 12. Funding Opportunity Number:**

FR-5300-N-10

* Title:

Fair Housing Initiatives Programs (FHIP) - Private Enforcement Initiative (PEI)

13. Competition Identification Number:

PEI-10

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Bay, Saginaw, Midland and Genesee Counties

*** 15. Descriptive Title of Applicant's Project:**

Fair Housing Center of Eastern Michigan

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

Version 02

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="258,577.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="91,277.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="7,500.00"/>
* g. TOTAL	<input type="text" value="357,354.00"/>

* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes", provide explanation.)

Yes No

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative: * Date Signed:

Application for Federal Assistance SF-424

Version 02

*** Applicant Federal Debt Delinquency Explanation**

The following field should contain an explanation if the Applicant organization is delinquent on any Federal Debt. Maximum number of characters that can be entered is 4,000. Try and avoid extra spaces and carriage returns to maximize the availability of space.

[Empty text input area for Applicant Federal Debt Delinquency Explanation]

