NSP2 Technical Training
September 21, 2010
Welcome
Rick Ballard
Agenda

9:00 Welcome
9:15 HUD Regulatory Changes
9:30 Acquisition
10:30 Opal review

10:45 Break

11:00 Compliance Reminders

LUNCH

12:45 Purchasing REO Properties
1:15 Updates to the Policy Manual – MSHDA Web Site
1:30 Rehab Standards
2:00 MSHDA Mortgages
2:15 Administration/ Activity Delivery
2:30 Reporting

2:45 Break

3:00 MSHDA Monitoring Process
3:15 Requesting Draws
3:30 Marketing Materials

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Regulatory Changes

Rick Ballard
25 Percent Low-Income Set-Aside

• As in NSP1, 25% of all funds must be expended on housing for households at or below 50% AMI;

• Under NSP3 changes, housing need not be in units abandoned or foreclosed;

• Changes are retroactive to NSP1 and 2
Implications for NSP2

• Abandoned and foreclosed units are likely to be single-family homes;

• Some target areas may also have one or more abandoned or foreclosed residential properties;

• Can meet set-aside on vacant sites for new multifamily construction;
  – MSHDA’s Rental Development Division may be able to assist you in identifying a site and/or a potential developer.
HUD has Granted Demolition Waiver for Michigan

- Total for Michigan may be up to 32 percent
  - Most city/land bank partnerships are not at the 10 percent previously allowed;
  - Some may want to increase the share of their budget for demolition;
  - MSHDA is ready to work with local city/land bank partnerships to increase demolition up to 32 percent
  - Where local partnerships don’t want to use the full 32 percent, some city/land bank programs may be able to go higher
Changes in Target Areas

- HUD is actively discouraging changes in Target Areas
- HUD *may* be more open to “swapping” census tracts
- MSHDA will try to assist by supporting requests for changes, but does not have the authority to approve changes
Changes in Target Areas

• If you are interested in requesting a change, do not spend any NSP2 dollars in tracts you may want to delete

• Begin by focusing on areas you know you want to address that are already approved
Acquisition
Tonya Young
NSP2 Eligibility

• Definitions: Foreclosed, Abandoned, Vacant, Demolished (see handout)

• Demolition only – LMMA Area Benefit
  [link]

• Beneficiaries – LMMI Benefit/Income Eligible
LMMA Verification Process for Demolition Only Projects

Examples:
Flint City Census Tract 9 Block Group 5 – Yes
Flint City Census Tract 16 Block Group 1 – No

Battle Creek Census Tract 300 Block Group 2 – Split Yes (Urban) and No (Rural)
If Split, a memo to the file must be created certifying that the property is located in the eligible portion of that census tract.
LMMA Info

- Look on American Fact Finder
  http://factfinder.census.gov/servlet/AGSGeoAddressServlet?_lang=en&_programYear=50&_treelId=420
- Policy Map http://www.policymap.com/maps
Eligible Use B

- Sheriff’s Deed
- Deed “C” – Asset backed pass through certificates series xxx
- Deed in lieu of foreclosure
- Tax foreclosure documents
- Foreclosure proceedings notice

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Abandoned/Vacant

Proof of Abandonment:
• Proof of no utilities for 90 days or more
• No taxes or mortgage payments for 90 days or more

Proof of vacancy:
• Unoccupied based on site inspection
OR
• No structure on site (vacant and/or demolished)

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Blighted – Eligible Use D

Blight Certification Letter in File based on NSP2 Definition of Blight

Note: Ownership of property by a Land Bank is not sufficient on its own to meet blight definition.
NSP2 Acquisition Tool

NSP2 Required Documents

• File management
• Handout review
OPAL Review

Renee Conklin
Budgets Containing Direct Homeownership Assistance

• Battle Creek
• Benton Harbor
• Detroit
• Flint
• Grand Rapids
• Hamtramck
• Highland Park
• Kalamazoo
• Lansing
• Saginaw
• Wyandotte
Budget Amendments for Direct Homeownership Assistance

- Per HUD, Direct Homeownership Assistance should NOT be included for units that will be acquired, rehabilitated or constructed, then sold to an eligible household.
- Section 7.6 of the OPAL Grantee User Manual describes how to request a budget amendment. Your CDS is available to assist as well.
- OPAL training is also available to all grantees. Please contact your CDS to set-up a date for CD Staff to provide training; your place or ours.
Compliance Reminders
Carolyn Cunningham

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Procurement – The purchase of goods and services with public $ (Part 85.36)

- Use own procedures if conforming
- Contract administration system
- Written code of conduct--Conflict of interest (PB #8); Gifts
- Review proposed procurements
- Intergovernmental agreements
- Use Federal excess and surplus equipment/property
- Value engineering clauses
- Select responsible contractors
- Dispute procedures
- Maintain records

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**Competition**
- Maximum free and open competition
- Written selection procedures
- Clear bid evaluation requirements
- Appropriate procurement method
- Affirmative marketing to WBE/MBE

**Cost analysis**

**Bonding** -- for construction contracts >$100,000
- May accept grantee’s bonding requirements OR
  - 5% bid guarantee
  - Performance bond = 100%
  - Payment bond = 100%

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Contract Provisions (85.36i)
- Legal remedies for breach of contract
- Termination
- E.O. 11246 (EEO)
- Copeland Anti-Kickback Act
- Davis Bacon Act
- Contract Work Hours and Safety Standards
- Reporting requirements
- Patent rights
- Access to records
- Clean Air Act
- Energy efficiency

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Davis Bacon and Related Acts

What NSP activities trigger DBRA compliance?
• Rehab on properties that contain 8 or more units (not the # of units being rehabbed). Property = 1 or more contiguous lots/parcels, commonly owned and operated as 1 rental, co-op or condo
• NSP funding for “acquisition only” does not trigger DBRA

Basics:
• Payment of not less than prevailing wage rates to all laborers and mechanics (www.wdol.gov)
• Compensation for overtime hours (over 40 hours @ 1.5 regular basic rate of pay)
• Certified weekly payroll reports
• Accurate records

OCD Policy Bulletin #14
Fair Housing/Equal Opportunity

Statutes:
• Rehabilitation Act (1973) Section 504
• Fair Housing Amendments Act (1988)
• Amended Civil Rights Act of 1968
• Americans with Disabilities Act (1998)
Fair Housing/Equal Opportunity

Affirmatively Furthering Fair Housing

– Conduct an Analysis of Impediments to FH Choice (AI)
– Take appropriate actions to overcome effects of impediments
– Maintain records
Fair Housing/Equal Opportunity


#3. Complaint Procedure and Conflict Resolution
#22. Fair Housing

A. Sample Fair Housing Resolution
B. Fair Housing and Anti-Discrimination Laws
C. Fair Housing Logs
D. Fair Housing Resources
E. Equal Opportunity Clause, EO 11246
F. Fair Housing Equal Opportunity for All
F. Fair Housing Equal Opportunity for All, Spanish

#23. Affirmative Marketing
Affirmative FH Marketing Plan
FH Standards for OCD Grantees

- FH Policy
- FH Contact
- Accessibility/Reasonable Accommodations
- Complaint referral system
- FH Log
- Fair Housing Resources
- FH materials/logos/EEO & EHO posters
- “Fair Housing, Equal Opportunity for All”
NFHA Recommendations
(Nat’l Fair Housing Alliance, 2010 Trends Report)

Affirmatively Furthering FH (AFFH)
Stronger AFFH regulations
Amend the FH Act to allow civil rights actions against HUD grantees for FH violations

Improve enforcement of FH Act
Private FH enforcement
Greater investigation of lending institutions
Create federal FH enforcement agency

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Tenant Protections at Foreclosure

• American Recovery and Reinvestment Act of 2009 (ARRA, Recovery Act)
• Protecting Tenants at Foreclosure Act of 2009 (PTAF)
• HUD Federal Register Notice of June 24, 2009
Tenant Protections at Foreclosure

“Immediate successors in interest” of a residential property being foreclosed bear responsibility

– Provide 90-day notice to vacate to “bona fide” tenants
– Except where purchaser will occupy as primary residence, term of lease remains in effect
– Applies to:
  • federally related mortgage loans
  • any dwelling or residential real property
  • Housing Choice Voucher assistance
– Does NOT supersede the requirements of URA
Environmental Review

Tier II Project Checklists are to be used for residential properties only. All proposed projects involving commercial or industrial sites must be reviewed and approved by Bruce Jeffries, MSHDA’s Certifying Officer, 517-335-0183, jeffriesb@michigan.gov.

Every project set up will be checked against approved and published target area to validate project eligibility.
Environmental Review

RAMPS – HUD ER reporting system for NSP
– Tonya Young, 517-335-4337,
youngt4@michigan.gov

SHPO – Diane Tuinstra, 517-335-2723,
tuinstrad@michigan.gov
Section 3
Guy Stockard
Session Purpose

Clarify Section 3 responsibilities to:

1) Ensure compliance with the annual reporting requirements; and

2) Increase overall compliance with the objectives of the regulatory requirements of Section 3
A Changing Discussion

– Renewed emphasis on enforcement of Section 3.
– Previous discussions largely involved “how to avoid the intent of the law.”
– New discussion “how to implement creatively the spirit of the law to get results.”
What is Section 3?

- Section 3 of the Housing and Urban Development Act of 1968
- Implementing regulations at:
  24 CFR Part 135
- Statute: 12 U.S.C. 1701u
- Purpose/Intent
Section 3

To ensure that economic opportunities generated by certain HUD funded projects shall, to the greatest extent feasible, and consistent with existing Federal and State laws, be directed to low- and very low-income persons (particularly those receiving assistance for housing), and to the businesses that provide economic opportunities to these persons.
To the Greatest Extent Feasible

...what does this mean???
Simply Stated….

• HUD funds are one of the largest sources of federal dollars

• Typically result in new contracts, employment or training opportunities

• If economic opportunities are created…Section 3 residents and businesses receive preference

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Failure to Comply with Section 3

HUD holds direct recipients of covered funding accountable for their own compliance, and the compliance of their subrecipients and contractors
Penalties for Noncompliance

Sanctions for noncompliance include:

– Debarment
– Suspension
– Limited Denial of Participation in HUD Programs
Funding Thresholds

• The requirements for Section 3 apply to recipients of HUD CPD funding exceeding $200,000.

• Contractors or subcontractors that receive contracts in excess of $100,000 are required to comply with Section 3 in the same manner as the recipients.
Applicability to Entire Project

Section 3 requirements apply to the entire project or activity regardless if the project is fully or partially funded with covered financial assistance.
What Section 3 is NOT...

– A Racial Quota Program
– An Entitlement for Eligible Individuals and Businesses
– Only applicable to Direct Recipients
– Optional—It’s the law!
Section 3 Economic Opportunities

Section 3 regulations do not require hiring/contracting unless it is necessary to complete the project.

Only triggered when covered projects require “new” hires or contracting opportunities
Section 3 Economic Opportunities

– Not limited to low-wage construction jobs

– Prospective Section 3 eligible employees or businesses must demonstrate that they are qualified
Section 3 Residents

- Residents of Public Housing; or
- Low- and very low-income persons residing in the metropolitan area or non-metropolitan county

Certification of Eligibility
Section 3 & Minorities

• Section 3 of the HUD Act is race-neutral.

• The preferences provided by this federal act are based on income and location.
Responsibility #1
Implementing procedures designed to comply with the requirements of Section 3

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Section 3 Plans

- Strategies to target Section 3 residents and businesses

- Certification/Selection criteria

- Process for informing contractors about responsibilities and assessing hiring/subcontracting needs

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Section 3 Plans

– Penalties for noncompliance
– Incentives for good performers
– Reporting Requirements
– Recordkeeping
– Section 3 Coordinator
Responsibility #2

Notify Section 3 residents about training and employment opportunities and Section 3 businesses about contracting opportunities
Responsibility #3

Notify covered contractors about the requirements of Section 3
Responsibility #4

Incorporate the Section 3 clause into covered solicitations and contracts

24 CFR Part 135.38
Responsibility #5

Facilitate training and employment of Section 3 residents and award contracts to Section 3 businesses, as appropriate to reach the minimum numerical goals

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Responsibility #6

Minimum Numerical Goals:

– 30% of new hires annually
– 10% of the total dollar amount of covered construction contracts
– 3% of the total dollar amount of covered non-construction contracts

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Minimum Numerical Goals

– 24 CFR Part 135.30
– Numerical Targets (may be exceeded)
– Safe Harbor Compliance
– Other Efforts Taken to Achieve Compliance
Responsibility #7

Assisting and actively cooperating with MSHDA in obtaining the compliance of contractors
Responsibility #8

Refrain from entering into contracts with contractors that fail to comply
Responsibility #9

Documenting actions taken to comply with the requirements of Section 3, results of actions taken, and impediments, if any

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Responsibility #10

State or County agencies must attempt to reach the numerical goals regardless of the number of local governments that receive funding.
Responsibility #10, Continued

State or County must inform sub-recipients of the requirements of this part, assist them and their contractors with complying, and monitor performance.
Contact Information

Guy Stockard
stockardg@michigan.gov
517-373-6725
Contact Information

Diane Tuinstra

Cultural Resource Protection Specialist
State Historic Preservation Office
517.335.2723
TuinstraD@michigan.gov
LUNCH
Purchasing REO Properties
Sue DeVries
FHA First Look

- 10% Discount
- For direct recipients of NSP funds, Consortium members, and Subrecipients
- For-Profits are **NOT** eligible
- Special Instructions for participations
  
  [http://hudnsphelp.info/media/resources/NSPPolicyAlert_FirstLook_7-16-10.pdf](http://hudnsphelp.info/media/resources/NSPPolicyAlert_FirstLook_7-16-10.pdf)
National First Look

• Agreement between HUD and National Community Stabilization Trust (NCST)
• Can view bank owned properties all in one place
• First look period last 5-12 business days
• 24-48 hours to respond to pricing once appraisal on property is completed by bank
• NCST will obtain necessary tenant protection papers
• 13 Participating banks

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REOMatch – Reverse Look

• You can view pre-foreclosure status properties where “Notice of Default” has been filed
• Buyers can indicate interest in specific properties to create “Shopping List” to achieve property concentration for neighborhood stabilization
• NCST will identify Servicers for desired properties using various methods
• NCST will monitor desired properties for progression toward desired sale
• Sellers can make property disposition decisions such as stopping a charge-off based on prospect of an offer.

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NCST Webinar and Site Visits

• NCST will conduct a webinar for all consortium members in the next few weeks

• NCST will make a site visit to each interested consortium city and it’s related land bank to train on use of tools.
Updates to the Policy Manual

Sue DeVries
Policy Manual Updates

• Updates will be added as needed
• You will receive email alert regarding updates
• The most recent changes will be highlighted in yellow
• Policy Manual on the MSHDA web site at http://www.michigan.gov/mshda/0,1607,7-141-5564_54750---,00.html
MSHDA
Visitability Standards
For Newly Constructed Single Family Homes
Visitability: PA-182
Background

• The Inclusive Home Design Act; Commonly known as PA-182
• PA-182 passed in June 2006 and took effect on January 1, 2007
• PA-182 Requires 50% of all newly constructed MSHDA single-family homes meet visit-ability and adaptability requirements
PA-182 Minimum Requirements

• At minimum, One Zero-Step Entry at the Front, Side or Back
• All main floor interior doors, including bathrooms with “minimum” clear space entry of 32”
• Hallways “minimum” clear space of 36”
• At minimum, One Visitable Half Bathroom, Preferably a Full Bathroom on the main floor with future grab bar blocking installed at time of construction
• Environmental Controls located no more than 48” above the floor
Policy Bulletin 10 Attachment E

• More in-depth information and associated forms are located at the Office of Community Development (OCD) PB#10 Attachments E, 1, 2 and 3

• VISITABILITY CERTIFICATION

• VISITABILITY CONTRACT RIDER

• VISITABILITY WAIVER REQUEST
Incorporating PA-182/MSHDA Requirements

- All Plans and Specifications must be submitted to your Community Development Specialist (CDS) prior to OPAL set-up
- Plans and Specifications will be reviewed by Jim Davis, Construction Management Specialist
- If the plans and specifications comply to PA-182/ MSHDA guidelines and/or requirements, CDS will approve the project set-up in OPAL
- If the plans and specifications do not comply with PA-182/MSHDA guidelines, they will be sent back for modifications as needed
PA-182 Visitability Waiver Request

- Waivers will **not** be allowed unless certain site and/or Neighborhood Conditions prohibit the “Zero Step Entry”
- If a No-Step/Zero Step Entry can not be achieved, all other requirements must still be implemented unless otherwise impossible
- Technical Assistance may be available as needed to achieve the Zero Step Entry
- All projects must be reviewed. The 50% rule is a state wide achievement annually reviewed
- Grantees building new single family housing will be expected to reach the 100% Visit-Ability mark; unless otherwise unachievable or impossible
• MSHDA has developed eight (8) home designs that meet PA-182/MSHDA design criteria
• All eight (8) designs are available to OCD grantees building new single family homes
• Grantees can review the designs on the MSHDA web-site.
• The “web-site designs” feature two (2) façade renderings and floor plans which can be altered, adjusted, flipped or reversed to meet different landscapes and/or traditional neighborhood site conditions
• Full working drawings are available upon request after approval of grant-project set-up on OPAL
The Craftsman
The Craftsman

First Floor Plan

Second Floor Plan

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The Ferndale

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The Ferndale
The Ferndale
The Grayson

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The Grayson
The Karrington
The Karrington
The Karrington

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The Maplewood
The Maplewood
The Maplewood

FIRST FLOOR PLAN
THE MAPLEWOOD
Basement Plan
Total Living Area - 1,363 s.f.

SECOND FLOOR PLAN
THE MAPLEWOOD

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The Oakcrest
The Oakcrest

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The Oakcrest

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The Plymouth
The Plymouth
The Plymouth

FIRST FLOOR PLAN

SECOND FLOOR PLAN

Total Living Area - 1,261 s.f.

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The Stanton
The Stanton
MSHDA Energy Star Requirements

• The requirements of the Michigan Uniform Energy Code, Promulgated in 2003 but was held up in court until October 24, 2008

• OCD has been supportive of local efforts to build more energy efficient housing, to help maintain affordability and have a positive impact on the environment

• MSHDA Energy Efficiency Standards for OCD Funded Projects was revised on September 24th, 2007
MSHDA Energy Efficiency Requirements

• All new construction single family homes must be built to at least the Five (5) Star Energy Star Home Energy Standard per the HERS index rating system
• NSP#2 Gut-Rehabilitations and Substantial Rehabilitation Projects must meet the same Five (5) Star Energy Star Standard
• Substantial Rehabilitation is defined as projects with OCD investment over $35,000 in rehabilitation activities, inclusive of Lead Paint and/or Asbestos testing, Stabilization or Remediation
Documentation Requirements

- Grantees shall have their plans and specifications reviewed by a certified HERS rater to include (on site pre-drywall inspection) insuring Prescriptive/Performance Approaches
- Grantees Community Development Specialist (CDS) will review building plans prior to project set-up in OPAL
- A Final Five (5) Star Energy Star Certificate will be submitted to your CDS prior to final construction and developer fee payment
Resources

- Residential Energy Services Network (RESNET) [http://natresnet.org](http://natresnet.org)
- Warm Training Center at: [www.warmtraining.org/](https://www.warmtraining.org/)
- State of Michigan Energy Office at: [www.michigan.gov/cis/0,1607,7-154-25676---,00.html](https://www.michigan.gov/cis/0,1607,7-154-25676---,00.html)
MSHDA Mortgages

Renee Conklin

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MSHDA 80% Mortgage Still Available

• Funding for 80/20 loan under NSP1 is exhausted
• MSHDA will do manually underwritten mortgages up to 80% loan-to-value
• Balance of down payment and cash-to-close is provided by the local program
• Second mortgage forgivable over the HOME affordability period.

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Administration/Activity Delivery

Tonya Young
Definitions

• Administration - program specific activities

• Activity Delivery Cost – street address associated costs

• A process must be in place to ensure that time billed is documented by person and date

http://www.michigan.gov/documents/mshda/mshda_cd_nsp2_quarterly_staff_timesheet_330944_7.xls
Administrative Plan

Each city and land bank must prepare implement and have available on site an administrative plan. The plan will identify how the budgeted administrative dollars are anticipated to be expended over the grant term. There is a grant admin and management plan sample (module 2 appendix D of your policy manual).
Reporting
Tonya Young
NSP2 DRGR Reporting Deadlines

Quarters Ending
- September 30
- December 31
- March 31
- June 30
ARRA -- Work Tracked Hourly

ARRA NSP2 persons that are paid with any percentage of NSP2 funds are tracked on an hourly basis.
How Does This Work?

- Report is sent out on the 20th day for each consortium partner to complete based on all activities through the 25th day of the month in which the report is due.
- Consortium Partners submit report and make all OPAL updates by 27th day.
- DRGR system is locked down on 30th day except for narrative.
DRGR Process

• Consortium receives Report to complete
• Report completed for all progress through 9/25/10
• Report submitted to MSHDA by 9/27/10
• Consortium enters in all OPAL updates by 9/27/10

• MSHDA enters in OPAL Data into DRGR plus other Obligations and Leverage by 9/30/10

• MSHDA enters in Narrative based on Reports

• DRGR Report submitted to HUD on 10/10/10

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NSP2 ARRA Reporting Deadlines

Quarters Ending

- September 30
- December 31
- March 31
- June 30
How Does This Work?

- Consortium partner completes the job creation report on OPAL based on all jobs created through the 25th day of the month in which the report is due.
- Consortium Partners submit the report on OPAL by the 27th day.
- MSHDA takes job creation data and compares it to the total number of ARRA jobs reported on the DRGR report form.
- MSHDA prepares the ARRA report and submits it for review and approval on the 10th day of the following month.
ARRA Job Creation Reporting Process

• Consortium tracks all positions being paid for with ARRA funds – cut off date for quarter is 9/25/10
  (Consortium maintains backup documentation on site)

• Consortium enters in job data on OPAL Report by 9/27/10
  — (each quarter is counted separately)

• MSHDA enters in Data and prepares ARRA report by 9/30/10

• MSHDA submits report to HUD on 10/10/10
Determining Jobs Created

Step 1: Select Reporting Information Format

ARRA Funded Employee(s)
List Names, ID codes, etc. by Individual or by Group. Note that once listed, the employee should never be deleted, even if no longer employed on the project.
Using whatever individual identifier you like, such as actual names, internal employee numbers, or any other unique identifier that you use to keep records.

Employees may be grouped and listed here by group identifiers, such as contract number, company name, sub-project, or any other unique group identifier used to identify a group of employees working on a project whose hours can be aggregated.
Who is Reported?

- **MSHDA = Prime Recipient** (Tier 1)
  (MSHDA employees and service providers)

- **Consortium Partners = Subaward** (Tier 2)
  (Consortium, Subawards to: Nonprofit, For Profit and Counselor)

- **Subrecipients** (Tier 3)
  (Local contractors hired by Consortium, Nonprofit and For Profit)
Determining Jobs Created

Step 2: Determine Standard Full-Time Work Week For Consortium/ Subrecipients/ Contractors/ Vendors

Basis for FTE Calculation

*How many hours per week does the employer consider to be full time, for example "40".*
Determining Jobs Created

Step 3: Calculate total number of ARRA paid hours for Quarter by each Entity.

Hours Worked per ARRA Reporting Period

Beginning with the 1st quarter of ARRA funded employment on this project, list the number of ARRA-funded-hours-worked PER QUARTER. Do NOT list cumulative hours. Sick Leave and Vacation hours taken do count as hours worked.

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Determining Jobs Created

Step 4: Complete and Submit OPAL ARRA Report

Maintain Records Documenting Hours Worked per ARRA Reporting Period.
Monitoring Process and Requesting Draws

Jess Sobel
## Expenditure Deadlines

<table>
<thead>
<tr>
<th>Approximate End Date</th>
<th>Performance Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>March 31, 2011</td>
<td>Local grantee must expend at least 20% of their total award</td>
</tr>
<tr>
<td>Sept 30, 2011</td>
<td>Local grantee must expend at least 50% of their total award</td>
</tr>
<tr>
<td>March 31, 2012</td>
<td>Local grantee must expend at least 75% of their total award</td>
</tr>
<tr>
<td>Sept 30, 2012</td>
<td>Local grantee must expend at least 90% of their total award</td>
</tr>
<tr>
<td>Dec 31, 2012</td>
<td>Local grantee must expend at least 100% of their total award</td>
</tr>
</tbody>
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[Link to Michigan State Housing Development Authority](michigan.gov/mshda)
Marketing Materials

Deb Horak & Christina Campbell