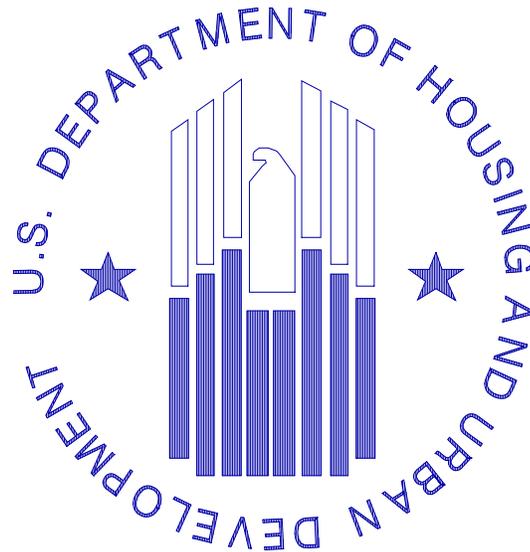


**U.S. Department of Housing & Urban Development
Buffalo, New York Office**



**2019
Annual Community Assessment Report**

For

Town of Union, New York
Community Development Block Grant Program

October 1, 2019 – September 30, 2020

Introduction

As a recipient of grant funds provided by the Department of Housing and Urban Development, each jurisdiction that has an approved Consolidated Plan shall annually review and report to HUD on the progress it has made in carrying out its Consolidated Plan and Annual Action Plan. The performance report is submitted to HUD in the form of the Consolidated Annual Performance and Evaluation Report (CAPER).

HUD has the responsibility to review the CAPER report and the performance for each jurisdiction on an annual basis. In conducting performance reviews, HUD will primarily rely on information obtained from the recipient's performance reports, records, findings from monitoring reviews, grantee and subrecipient audits, audits and surveys conducted by the Inspector General, and financial data regarding the amount of funds remaining in the line of credit plus program income. HUD may also consider relevant information pertaining to a recipient's performance gained from other sources, including litigation, citizen comments, and other information provided by or concerning the recipient. A recipient's failure to maintain records in the prescribed manner may result in a finding that the recipient has failed to meet the applicable requirement to which the records pertain. Such information, along with grantee input, is considered in HUD's Annual Community Assessment to make a determination that a grantee has the continuing capacity to administer HUD programs.

In the assessment of your community's performance, this report is prepared to provide feedback on your community's performance in the delivery of HUD's Community Development Programs. This report is presented in two sections. Section I provides a general summary related to your planning and performance reporting. Section II provides general overview related to specific program progress and performance.

Assessment Period:	October 1, 2019 – September 30, 2020
4th Year of a 5-year Consolidated Plan	
Programs Administered & Funding Amounts:	<u>CDBG</u> 2019 Allocation - \$1,232,339 2019 Disbursements - \$1,068,938
	<u>Disaster Relief Grant</u> \$10,137,818 Awarded 2012

Summary of Compliance with Consolidated Plan and 2019 Annual Action Plan

A Consolidated Annual Performance and Evaluation Report (CAPER) is due 90 days after the Town completes its 2019 program year. The Town consistent with HUD COVID 19 rules was allowed to submit its CAPER after the 90 day-program requirement. The CAPER for 2019 was received by the HUD Buffalo Field Office on February 19,2021. The report was determined to be substantially complete, and accurately described the Town's performance throughout the program year.

It was determined that the Town followed its HUD-approved Consolidated Plan and Annual Action Plan during the 2019 program year, consistent with the Town's stated goals, objectives and priority needs for each program funded. These goals, objectives and priority needs were based on the following four key elements identified by the Town:

1. Provide Extremely Low, Very Low, and Low-Income Renters with Rental Assistanances.
2. Provide Housing Units and Support Services for Persons with Special Needs
3. Produce and Preserve Housing by Promoting Homeownership
4. Pursue Community and Economic Development Activities

The activities designed, funded and completed during this reporting period supported these goals, objectives and priorities. More detailed information about accomplishment highlights and assessments of expected accomplishments to actual accomplishments can be found in Section II of this report.

Section II – Program Progress and Performance

Community Development Block Grant (CDBG)

Summary of Performance Indicators and Accomplishments

Activities: Program activities were adequately described during the reporting period. CDBG funds were spent on activities that were eligible under program rules. The following highlights activities and accomplishments that were completed during the program year:

Housing: The Home Improvement program progress was somewhat constrained in the current program year by the COVID-19 pandemic and associated shutdowns. The Section 8 Housing Choice Voucher program provided support for 318 occupied units. The First Ward Action Council completed minor home improvements/repairs for 70 seniors during the program year utilizing \$20,000.00 in CDBG funds. Also, one low-to moderate-income household was provided \$5,250 in CDBG funds to assist in the purchase of their single-family home.

Public Facilities and Improvements: The Town expended \$585,555 for various street reconstruction projects and public park improvements in low/mod target areas in the Villages of Johnson City and Endicott.

Public Services: Ten (10) organizations were assisted with \$127,854 in CDBG public service funding. Criteria used in selecting agencies for funding included the community needs addressed by each agency, the ability of the proposed program to meet those needs, the availability of alternative resources to meet the needs, and the cost-effectiveness of the proposal. Meals on Wheels, the Western Broome Senior Center, Catholic Charities Teen Transitional Living Program, and The Johnson City Senior Center and others received CDBG funds. Public service expenditures were 11.28% of overall spending, which is within the 15% program limit.

Planning and Administration: The Town spent \$135,179 for planning and administration during the reporting period, which accounts for 10% of their overall spending. That was well within the 20% limit.

National Objective Compliance: The CDBG program was designed to principally benefit low-moderate income persons. During the reporting period, it was determined that the Town spent 96.66% of their funds on activities that principally benefitted low-moderate income persons.

Program Progress and Timeliness: The CDBG program requires that the Town's unexpended CDBG funds to be no more than 1.5 times their annual grant, including program income, 60-days before the end of the program year. The financial analyst reports the Town's timeliness ratio at 1.38% at the July 1, 2020 test date.

Fair Housing and Equal Opportunity: Similar to the 2018 program year review FH&EO has determined the Town's non-English speaking population is greater than 5% (3.9% Asian and 3.6% Hispanic). Therefore, the Town must engage in the Limited English Proficient (LEP) Four-Factor Analyses for its Asian and Hispanic population, and develop a Language Assistance Plan (LAP) if it has not already done so. This includes among other things the development of a robust outreach program to the LEP; and to organizations serving the LEP community in the Town's jurisdiction; identification and translation of vital documents, thus ensuring significant access to these populations to programs and services funded by HUD. A copy of these documents must be submitted to FHEO within 60 days. The Town can obtain information from www.lep.gov. Should the Town require Technical Assistance please contact Tammy M. Muffoletto, EO Specialist at tammy.m.muffoletto@hud.gov or 716-646-7054. The CPD representative requests that FH&EO provide documentation on the methodology used to determine the non-English speaking population.

HUD Monitoring: The Town's Disaster Recovery grant was monitored on-site by Buffalo Field Office staff in 2017. There were no findings or concerns issued.

Financial

The financial information provided by the Town appears to be complete, accurate, and with a sufficient level of detail to document the overall financial condition of the CDBG program. The Financial Summary Report submitted with the 2019 program year CAPER is accurate and complete. During the program year, the Town has also correctly received program income in IDIS, submitted quarterly Federal Financial Reports, and is current with required audits. Our review did not reveal any significant issues related to overall financial compliance.

Management

The Town reports that they regularly monitor and evaluate subrecipients administering activities with CDBG funds.

In addition to its CDBG allocation the Town Planning Department administers a Disaster Relief Grant (DRGR) of \$10,137,818 awarded to address damage caused by a historic flood that occurred on September 7-9, 2011. The CDBG-DR program is the primary funding source for addressing the impacts of the 2011 flood event that created widespread damage in several neighborhoods within the Town. Accomplishments for the CDBG-DR program is reported through HUD's Disaster Recovery Grant Reporting System (DRGRS). The Town as of March 26, 2021, has expended \$9,656,677 of the \$10,137,818 grant award. The unexpected delays caused by eminent domain issues regarding right of way access that had prevented the completion of levee repairs were resolved and the repairs were completed in October 2020, that resulted in the expenditure of the remaining DRGR grant funds.

Recommendations/Areas for Improvement

It is recommended that the Town continue to monitor program activities to ensure that CDBG funds are spent in a timely manner. Also as cited in the FH&EO section, the Town must engage in the Limited English Proficient (LEP) Four-Factor Analyses for its Asian and Hispanic population and develop a Language Assistance Plan (LAP).

This report was prepared by: Lambros Touris, CPD Representative
716-646-7023

The Town had the opportunity to respond within 30 days concerning the information contained in this report. No response was received; therefore, this report is final and will be considered the Town's Program Year Review Letter as required by HUD regulation. Consistent with the Consolidated Plan regulations, the Program Year Review Letter should be made available to the public through the City's established citizen participation process. HUD will also make it available to citizens upon request.