

FEDERAL FISCAL YEAR 2020 CONSOLIDATED ANNUAL  
PERFORMANCE & EVALUATION REPORT

*DRAFT*

TOWN OF UNION, NEW YORK

PREPARED BY: DEPARTMENT OF PLANNING & COMMUNITY  
DEVELOPMENT

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## **CR-05 - Goals and Outcomes**

**Progress the jurisdiction has made in carrying out its strategic plan and its action plan.**

### **91.520(a)**

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

### **Housing Affordability**

As of the November 1- November 30, 2021 Voucher Management System (VMS) report, three hundred one (301) occupied units were under lease through the Section 8 Housing Choice Voucher program.

### **Homeownership**

During the course of FFY 2020, the Town of Union assisted three (3) low or moderate-income households in the purchase of a single-family home through the use of \$19,251.00 in CDBG funding.

### **Preservation of Housing Stock**

Using \$83,132.97 in CDBG funding, \$2,904.94 in project delivery costs, the town completed two (2) on-going home repairs and is continuing to work with five (5) on-going participants from FFY 2019. These five still remain open due to contractor delays caused by staffing issues, contractor labor shortages, and material supply chain delays. Five (5) applicants were pulled from the Home Improvement Program Waiting list in early summer 2021, two (2) of whom are currently underway in the program.

### **Elderly Housing/Support**

The First Ward Action Council completed minor home improvements/repairs for seventy three (73) seniors during the program year, utilizing \$20,000.00 in CDBG funds.

### **Homeless Housing and Support Services**

\$25,000.00 in CDBG funds was provided to Catholic Charities in support of its Teen Transitional Living Program which serves runaway teens. \$6,000.00 in CDBG funds was provided to Rise-NY (d/b/a S.O.S. Shelter) to complete roofing repairs to a domestic violence shelter for women and children; the project was completed within the PY but accomplishment data was not reported until after the close of FFY 2020.

### **Neighborhood Preservation**

\$285,176.70 in CDBG funds were expended for reconstruction of Grand Avenue -St. Charles Street to Hudson Street.

Due to delays caused by COVID-19, previously scheduled park improvements for George W. Johnson Park in the Village of Endicott (originally scheduled for FFY 2019) were completed in FFY 2020 instead. A new fence and a new playground for pre-school aged children were installed, utilizing \$63,753.50 in CDBG funds. \$4,170.00 was expended for in-rem property maintenance.

### **Public Services**

The Town of Union allocated funds to 10 public service organizations for FFY 2020. These were assisted with \$153,627.75 in CDBG public service funding. Criteria used by the Citizen's Advisory Committee in selecting agencies for funding included which community needs were addressed, other agencies offering similar services, the ability of the program to meet needs, the availability of alternative resources, the number of town residents served, and the cost-effectiveness of the proposal. \$93,097.55 of the total amount went to elderly services, \$50,134.30 went to youth services, and \$10,395.90 went to childcare services.

### **Special Needs**

\$1,800.00 in CDBG funds was expended to meet this need.

### **Neighborhood/Public Facilities**

The Town of Union expended \$30,000.00 for pool repairs for the Southern Tier Community Center and \$24,179.81 for a generator replacement for an affordable housing development that houses 50 low income elderly and disabled residents.

### **Economic Sustainability**

\$48,843.97 was expended for Economic Development administration. The Town of Union Local Development Corporation did not close any loans during this program year. \$93,770.15 was expended in CDBG-CV funds to provide emergency assistance to small businesses in response to the COVID-19 pandemic. # full-time jobs and # part-time jobs were created during FFY 2020 from previously closed loans. These jobs consisted of # low-income person, # extremely low-income person, and # non-low/moderation income person.

### **Lead Based Paint Education**

Lead paint educational brochures were distributed to all participants of the First Time Homebuyer, Home Improvement, and Section 8 Housing Choice Voucher programs. Additionally, a consulting firm provides comprehensive lead paint and clearance testing for all home improvement projects completed with CDBG funding.

### **Program Administration**

\$117,158.63 in CDBG funds was expended for administrative/planning costs. \$70,181.443 in CDBG-CV funds was expended for administrative/planning costs.

**Subsistence Payments**

\$85,841.27 in CDBG-CV funds were provided to low-to-moderate income households to assist with rental and utility payments.

**Other**

There were no funds expended during the current reporting year for Fair Housing Education, Historic Preservation, or ADA Enhancements.

**Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)**

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	% Complete	Expected – Program Year	Actual – Program Year	% Complete
Grant Administration/Oversight	Grant Administration		Other	Other	1	0	0.00%	1	0	0.00%
Low/Moderate Job Creation	Non-Housing Community Development		Jobs created/retained	Jobs	25	0	0.00%	5	0	0.00%
Neighborhood Preservation	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	8270		0	8270	
Neighborhood Preservation	Non-Housing Community Development		Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		10	0	0.00%
Neighborhood Preservation	Non-Housing Community Development		Homeowner Housing Rehabilitated	Household Housing Unit	0	48		0	48	

Neighborhood Preservation	Non-Housing Community Development		Buildings Demolished	Buildings	5	0	0.00%	2	0	0.00%
Neighborhood Preservation	Non-Housing Community Development		Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	5	0	0.00%	2	0	0.00%
Neighborhood Preservation	Non-Housing Community Development		Other	Other	10	0	0.00%			
Owner Occupied Housing Rehabilitation	Affordable Housing		Homeowner Housing Rehabilitated	Household Housing Unit	50	0	0.00%	10	0	0.00%
Prevent, Prepare for, Respond to coronavirus	Non-Housing Community Development		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10	0	0.00%			
Prevent, Prepare for, Respond to coronavirus	Non-Housing Community Development		Homelessness Prevention	Persons Assisted	10	0	0.00%			
Provide Assistance to First Time Home Buyers	Affordable Housing		Homeowner Housing Added	Household Housing Unit	0	0		5	0	0.00%
Provide Assistance to First Time Home Buyers	Affordable Housing		Direct Financial Assistance to Homebuyers	Households Assisted	20	0	0.00%			
Provide Housing Services to the Elderly	Affordable Housing		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		60	0	0.00%
Provide Housing Services to the Elderly	Affordable Housing		Homeowner Housing Rehabilitated	Household Housing Unit	300	73	24.33 %	0	73	
Provide Public Services Targeted to the Elderly	Non-Housing Community Development		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	9816	3313	33.75 %	2454	3313	135.00 %

Provide Public Services Targeted to Youth	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	1000		0	1000	
Provide Public Services Targeted to Youth	Non-Housing Community Development		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1968	307	15.60 %	492	307	62.40 %
Provide Public Services to Persons w/Disabilities	Non-Housing Community Development		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	160	14	8.75%	40	14	35.00 %
Provide Rental Assistance to VLI Households	Affordable Housing		Tenant-based rental assistance / Rapid Rehousing	Households Assisted	1750	0	0.00%	350	0	0.00%
Provide Services to Homeless Persons/Families	Homeless		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	147		0	147	
Provide Services to Homeless Persons/Families	Homeless		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	10		185	10	5.41%
Provide Services to Homeless Persons/Families	Homeless		Homeless Person Overnight Shelter	Persons Assisted	175	0	0.00%	0	0	
Provide Services to Homeless Persons/Families	Homeless		Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0		0	0	
Provide Services to Homeless	Homeless		Homelessness Prevention	Persons Assisted	800	0	0.00%			

Persons/Families										
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Table 1 - Accomplishments – Program Year & Strategic Plan to Date

**Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.**

The town is in the first year of its 2020-2024 Consolidated plan and is working towards meeting the goals outlined for each activity. Due to the change of two program directors within PY 2020 and continuing staffing, labor, and materials issues related to the collateral damage of the COVID-19 pandemic, there have been delays in completion of projects; most of the final accomplishment data for PY 2020 was not received and entered into IDIS until after the close of the year-end reporting period.

Expenses for the Housing Choice Voucher program are not tracked through the IDIS reporting system. Expenses for the Community Development Block Grant-Coronavirus (CDBG-CV) funds allocated to the Town of Union through the CARES Act are tracked through the IDIS system and are reported in this CAPER.

The Housing Choice Voucher program is the sole funding source for providing rental assistance to low and very-low income persons in the Town of Union. Reporting on the voucher program is accomplished electronically through HUD’s Real Estate Assessment Center (REAC). During the program year, the number of persons assisted fluctuated and ended in a decline due to delays and complications due to staff shortages, the labor market, the housing market, and the rental market, especially considering the end of the eviction moratoriums. The Town of Union instituted a number of applicable waivers available that allowed greater program flexibility to assist low and very-low income persons remain stably housed. The town also began the process of major software upgrades to allow a greater range and accessibility of virtual and digital services. However, a number of persons still left the program for a variety of reasons. In addition to program attrition, the Town of Union has struggled to get new persons leased up on the program. Persons pulled from the waiting list have experienced an extremely difficult time finding suitable units to lease up. The time between voucher issuance and lease up has greatly increased due to lack of availability of accessible and first floor units, the aging housing stock in the town, and the volatility of the rental market. The current market is highly competitive and affordable units that pass HQS inspection are hard to come by. Restrictions on the availability of units, travel, and in-person viewings continue to result in longer than usual time between being reached on the Waiting List and actually leasing up. Staff members have had to adapt to program flexibility and severely decreased staffing at the town. As a result, remaining staff have worked diligently to assist current tenants remain stably housed and new program participants work through the lease up process. Persons on the Waiting List have faced longer than usual wait times due to the above mentioned issues. As of December 2021, 28.45 % of persons on the Waiting List are elderly, 48.35% are families with disability, and 35.91% are families with children. In addition to the increased time to lease-up due to COVID-19, as participants die, relocate to congregate care facilities, or are terminated for failure of program family obligations, the amount of time it takes to replace the leased unit has been significantly increasing over the past number of years. This increase is directly related to a lack of funding for staffing resulting from HUD’s proration (roughly 80% of the regulatory formula) of administrative fees paid to the Town of

Union for much of the past decade. This reduction of critical administrative funding has limited the town's ability to maintain adequate staffing levels or invest in software that would make the program's day-to-day activities more efficient and cost effective. The Town is working to use CARES Act funds to upgrade software and streamline administrative processes in an effort to increase productivity and efficiency of the program. These changes are currently underway and will take effect over the course of 2021 until fully implemented.



## CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG
White	7,327
Black or African American	1,040
Asian	259
American Indian or American Native	14
Native Hawaiian or Other Pacific Islander	11
<b>Total</b>	<b>8,651</b>
Hispanic	56
Not Hispanic	8,595

Table 2 – Table of assistance to racial and ethnic populations by source of funds

### Narrative

Race and ethnic data are collected by the public service agencies that receive CDBG funds through the Town of Union. These data are collected for the Town of Union clients and reports are submitted to the Town of Union on a quarterly basis. Data are then entered into HUD's IDIS system by Town of Union program staff. Program year-end reports are also submitted to the Town of Union to ensure all quarterly reports have been submitted accurately. An annual monitoring visit is conducted for each agency by Town of Union program staff to confirm reporting compliance.

## CR-15 - Resources and Investments 91.520(a)

### Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	1,476,258	1,001,428.23
Other	public - federal	2,631,981	1,688,455.85

Table 3 - Resources Made Available

### Narrative

The primary financial resources available during the program year included the FFY 2020 CDBG annual grant, remaining prior year CDBG funds, Housing Choice Voucher funds, , and CDBG-CV funds allocated to the Town of Union through the CARES Act.

The figure shown as “other” includes the Section 8 Housing Choice Voucher program and the CDBG-CV funds allocated through the CARES Act. This amount included \$1,180,706 in Housing Assistance Payments (HAP) and \$247,957 in administrative expenses for the period January 1, 2021 through November 1, 2021 for the Section 8 program. The figure also includes \$259,792.85 in emergency assistance payments for renters, homeowners, small businesses, and non-profits in relation to COVID-19 through CDBG-CV funds. The town began disbursing Round 1 CDBG-CV funds in FFY 2020 and has processed an amendment to allocate Round 3 funds. No Round 3 funds have been expended during the reporting period.

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
CDBG eligible Low/Mod CensusTract Block Group or Service Area	50		CDBG eligible Low/Mod CensusTract Block Group or Service Area
Townwide	50		Geographic area includes the entire town.

Table 4 – Identify the geographic distribution and location of investments

### Narrative

The First Time Homebuyer and Home Improvement program funds may be utilized anywhere in the town; participants are eligible based on household income guidelines issued by HUD. Many of the HIP projects were delayed due to COVID-19 and the associated shutdowns. Many contractors were shutdown for extended periods of time. When they reopened they faced a major backlog of projects slated for completion, a shortage in the availability of construction supplies, increased costs in construction supplies, and new working conditions based on social-distancing protocols. Currently, many contractors have reported major staffing shortages and supply chain issues with ordering of materials.

This has resulted in contractor inability to submit bids for projects and, in some cases, complete projects in a timely fashion. Infrastructure projects are limited to eligible CDBG services areas. All infrastructure improvement projects were completed in CDBG target areas. During FFY 2020 one (1) street reconstruction project occurred: the Village of Johnson City Grand Ave Phase 4 St. Charles Street to Hudson Street. The Village of Endicott also completed park improvements in PY 2020 originally scheduled for FFY 2019 at George W. Johnson Park, which serves a primarily low-to-moderate income service area. These improvements included the replacement of fencing and installation of a new playground for pre-school aged children.

## **Leveraging**

**Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.**

Leveraging data is only reported for the First Time Homebuyer program since no loans were closed by the Town of Union LDC. For every \$1.00 of CDBG funds spent, \$16.71 was leveraged in private funds for the FTHB program.

## CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	0	0
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>0</b>	<b>0</b>

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	0	0
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>0</b>	<b>0</b>

Table 6 – Number of Households Supported

### Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

Home Improvement program progress was constrained in the program year due to the previously mentioned issues, including labor and materials shortages, faced by contractors. Housing Choice Voucher program leasing rates during the program year were lower due to the collateral damage of the COVID-19 pandemic, ending of eviction moratoriums, highly competitive rental market, and HUD's continued pro-ration of administrative fees owed to PHA's. For much of the past decade, the town's HA has only been receiving roughly 80% of earned administrative fees calculated by the terms of the

original agreements, which reference payment under the “Column A” formula. The funds allocated to the Town of Union through the CARES Act have allowed the town to invest in upgraded software capability to allow staff to work remotely when needed, and to increase accessibility and efficiency through virtual and digital offerings. These upgrades will reduce operating costs for items such as printing and postage and reduce the amount of time staff spends responding to verbal requests regarding waiting list status and recertification and filing physical papers. It will increase the town’s ability to communicate with program participants when disseminating tenant outreach letters and emergency notices or informational brochures.

**Discuss how these outcomes will impact future annual action plans.**

The Town of Union 2020-2024 Consolidated Plan and FFY 2020 Annual Action Plan had proposed changes to both the FTHB program and HIP program. The FTHB program limit for purchase price was increased to \$90,000.00 and HIP project limits were increased to \$20,000.00 per unit. This was meant to make more units available to first time homebuyers, especially given the competitive housing market as a result of COVID-19. The increased HIP costs have accounted for increase cost of materials and the increased need for higher impact repairs given the aging housing stock in the town. All HIP projects are lead paint compliant due to contracted services to test all units pre-and post project.

**Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.**

<b>Number of Households Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>
Extremely Low-income	56	0
Low-income	49	0
Moderate-income	18	0
<b>Total</b>	<b>123</b>	<b>0</b>

**Table 7 – Number of Households Served**

**Narrative Information**

The Town of Union does not receive HOME funds; above numbers reported are for CDBG funded programs only.

## **CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)**

**Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:**

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

The Town of Union does not receive ESG funding. The town is a member of the regional Continuum of Care. Outreach is conducted through NY-511 Binghamton/Union Town/Broome, Otsego, and Chenango Counties CoC.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

Although the town does not receive ESG funds directly, it has provided operational support for a teen transitional housing program through Catholic Charities and funding for capital improvements to a domestic violence shelter.

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

The Town of Union does not receive ESG funding. These activities are accomplished through NY-511 Binghamton/Union Town/Broome, Otsego, and Chenango Counties CoC.

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

The Town of Union does not receive ESG funding. These activities are accomplished through NY-511 Binghamton/Union Town/Broome, Otsego, and Chenango Counties CoC.

## **CR-30 - Public Housing 91.220(h); 91.320(j)**

### **Actions taken to address the needs of public housing**

Does Not Apply; there is no public housing in the Town of Union. The town's PHA (NY505) is a Section 8 (Housing Voucher Program) only.

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

Does Not Apply; there is no public housing in the Town of Union. The town's PHA (NY505) is a Section 8 (Housing Voucher Program) only.

### **Actions taken to provide assistance to troubled PHAs**

The town's PHA (NY505) is a Housing Choice Voucher program only and is not rated as Troubled. The most recent SEMAP scoring (2019) rated the town as a "High Performer". HUD issued a notice to PHAs that a waiver was issued suspended SEMAP scoring for the Town of Union for the 2020 program year and that the town would retain its score from 2019. Regular SEMAP scoring is anticipated to resume in program year 2022.



## **CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)**

**Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)**

The Town of Union completed an update of the Analysis of Impediments (AI) in October of 2014. Town of Union staff have been working on an update to the AI but have been delayed by subsequent loss of key staff. The town plans to complete the update in 2022. This report will include outreach to community agencies, lending institutions, and the public. There will be a thorough analysis of census data, Home Mortgage Disclosure Act (HMDA) data, and local housing and land use policies.

At the time of the 2014 AI, the town did not receive any suggestions, recommendations, or complaints from the public regarding fair housing choice. Analysis of HMDA data did not indicate any impediments to fair housing choice. No federal, state, or local fair housing or human rights agencies had any open complaints on file for the Town of Union. The town has received one (1) complaint since the 2014 AI in November 2020. The investigation has been completed and it was found that there was no evidence of discrimination on behalf of the town.

The town's efforts to promote fair housing opportunities through the use of federal funding include, but are not limited to, a housing rehabilitation program, a first-time home buyer program, public services, and neighborhood revitalizations activities. These programs are aimed at assisting low and moderate-income persons with housing related needs.

The Town of Union's Department of Planning & Community Development acts in its capacity as the fair housing office to conduct outreach regarding fair housing issues and affordable housing opportunities. Outreach efforts have included mailings to community groups and interested parties, media advertising, presentations to community groups, neighborhood town meetings, local conferences, and sitting on a Safe Housing Taskforce created in response to the COVID-19 pandemic.

The 2014 AI included an analysis of the town's property tax policies and zoning ordinance, neither of which were determined to present impediments to fair housing. As part of the study, the town also examined the composition of the boards and committees that work with issues relating to housing and community development. These groups were found to consist of a diverse representation of community members.

The Town of Union continues to publicize the importance of fair housing in advertisements and flyers used as part of the Section 8 Housing Choice Voucher Program briefing packet. Approximately 20 Section 8 families received such counseling as part of the briefing process in the past year.

While there are few actions that can realistically eliminate all barriers to affordable housing, the town is making an effort to ameliorate conditions that can prevent residents of the town from obtaining quality, affordable shelter. These efforts include the following:

- The town will continue its efforts to initiate and adopt regulations designed to eliminate barriers to the creation of affordable housing.

- The town will continue to encourage banks to participate in the Small Business Administration's Micro-loan Demonstration Program and will continue to try to provide financial opportunities and partnerships for local developers and builders.

- Housing counseling services will continue to be provided to first time homebuyers to ensure equal access to all available units throughout the town.

### **Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)**

Some of the barriers to homeownership that were addressed in the 2020-2024 Consolidated Plan and FFY 2020 Annual Action Plan included poor credit histories, lack of down payment/closing cost funds, and the inability to save for future repairs. The COVID-19 pandemic caused an increase in competition for housing and increased home prices in Broome County in 2020 and 2021. The town's First Time Homebuyer Program addressed these potential barriers by providing funds for closing costs and in some cases subsidies to lower the purchase price of homes. In the 2020-2024 Consolidated Plan, the town changed the FTHB program to increase the eligible purchase price to \$90,000.00 to account for increased home prices and to make higher quality housing accessible to program participants. The town also makes funds available to participants for rehabilitation projects. The town recognizes the importance of homeowner counseling, not solely for households with credit problems, but for all potential homebuyers as a tool to understanding the responsibilities of homeownership. During the past fiscal year, Metro Interfaith, who is a HUD certified housing counseling agency, ended its contract with the town for assistance with the First Time Homebuyer and Home Improvement Programs. The town is exploring options to continue its mission of first time homebuyer assistance and counseling. Credit counseling agencies have played a vital role in special homeownership programs developed by the town. The town has also been able to minimize the impact of the national housing crisis on CDBG funded first time home buyers by not allowing the use of sub-prime mortgages.

### **Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)**

During the program year, hundreds of visual assessments were performed by the town inspector under the Section 8 Housing Choice Voucher, First Time Homebuyer, and Home Improvement programs. The town also distributes the pamphlet Protect Your Family from Lead in Your Home to all Section 8, Home Improvement, and First Time Homebuyer program applicants. The town had previously written a letter of support for a lead rehab grant for the Broome County Health Department. The town now provides informational brochures advertising the successful lead abatement program run by Broome County. In addition, the town has made available to the public multiple new links to lead paint resources and information on its webpage. The town's Home Improvement program also addresses lead paint through the use of a contracted firm who performs lead paint testing and clearance testing on every unit that goes through the Home Improvement Program.

### **Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)**

All programs and priorities described within the five-year Consolidated Plan and undertaken during the past fiscal year were consistent with an overall goal to reduce poverty and to develop a viable urban community by providing decent housing, suitable living environments, and expanded economic

opportunities principally for low and very low-income persons. Some specific programs that were directly aimed at reducing poverty include the following:

a). *Housing Programs*: All of the town's existing housing programs assist low and very low-income persons with housing needs, including rental assistance (Section 8 Housing Choice Voucher program), housing rehabilitation (for low-income owners), and first time homebuyer assistance. In addition, several housing programs (i.e. First Ward Action Council Home Repair for Seniors) assist special needs low-income populations such as elderly populations. These programs help ease housing costs of low-income households.

b). *Public Service Programs*: The town dedicates a portion of its CDBG funding to support a wide variety of public service organizations. Agencies receiving these funds help meet critical needs of low and very low-income persons. This year, these services included childcare, elderly services, parent and family education counseling, youth development, vocational and career planning, independent living skills, and assistance to persons with disabilities. All CDBG funded programs provide essential services that encourage self-sufficiency.

c). *Economic Development*: A primary objective of all economic development activities funded by the Town of Union through the use of CDBG funds is the retention and/or creation of jobs for low-income persons. Any CDBG assistance to businesses requires employment opportunities for low-income persons, thus serving to aid in the reduction of poverty within the community. Job creation/retention accomplishments for the past fiscal year are provided in the narrative on economic development, presented earlier in this report.

d). *Homeless Assistance*: As part of the Town of Union's efforts to reduce poverty and homelessness, the town provides financial assistance to community agencies that serve the homeless and at-risk populations through the provision of emergency and essential services as well as services aimed at reducing and preventing homelessness. The town also supported the efforts of service providers that emphasize a comprehensive approach to addressing problems associated with homelessness and poverty. CDBG funds were provided to Catholic Charities Teen Transitional Living Program which provides intensive care management to homeless and runaway youth and to a domestic violence shelter for capital improvements.

### **Actions taken to develop institutional structure. 91.220(k); 91.320(j)**

Although the Town of Union's primary means of carrying out its housing and community development plan is through the use of the federal funding it receives, there is also a critical reliance on other community organizations to carry out this plan. These organizations include non-profit agencies, banks, private industry, and other levels of government, including the state. Most of the programs outlined by the town in the five-year plan that address community needs with respect to housing, homelessness, economic development, public infrastructure, and public services are administered by the Town of Union. Programs are staffed and operated by either the Town of Union or, in some cases, non-profit community organizations that receive funding from the town. While the town is successful in the programs that it administers through federal funding, it recognizes that the needs within the community are greater than it can address. Therefore, many of the priorities identified in the Consolidated Plan

require the commitment and assistance of other community organizations. The Town of Union continues to enjoy well-established and productive working relationships with many community agencies, including non-profit organizations, regional and local planning agencies, the private sector, and other levels of government including adjacent municipalities and the state. These relationships have resulted in many innovative partnerships to address community needs, several of which are mentioned in the Consolidated and Annual Plans. Some of these collaborative efforts include, but are not limited to, working relationships with The Agency, the Broome County Health Department, Opportunities for Chenango, and the Continuum of Care.

Within the town itself, the current gap in institutional structure is the lack of a permanent Community Development Director. The town has productive working relationships with two former directors who provide consulting services for the program but is currently seeking a long-term solution to the current lack of director. It is anticipated this gap in institutional structure will be resolved by early 2022.

**Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)**

The town continues to collaborate with private and public housing, health, and social service agencies on an as needed basis.

**Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)**

During the 2014 update of the town's Analysis of Impediments to Fair Housing, an analysis of American Community Survey data and most recent Home Mortgage Disclosure Act (HMDA) reports found no impediments to fair housing choice. There were no recommendations concerning fair housing choice problems or issues provided by the service agencies or the public.

*Actions to Address Impediments*

The Town of Union has taken a number of steps to ensure that its programs and actions are administered and advertised in a manner that encourages wide participation by all segments of the population. The town has undertaken specific housing programs to promote wider housing choice by providing financial assistance for owner occupied housing rehabilitation and mortgage assistance to purchase housing. The rehabilitation program incorporates necessary repairs to improve the housing stock and to make the units accessible to persons with disabilities. The rental assistance program has been administered in a manner to allow the widest choice of housing and to allow easy access to employment, education, and services.

## **CR-40 - Monitoring 91.220 and 91.230**

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

The Lead Agency routinely monitors program activity. After each drawdown of funds a reconciliation process involving the town Comptroller's Office takes place. A review is also completed to monitor the timeliness of expenditures requirement. The town's timeliness ratios were calculated on August 2, 2021 (1.38 Unadjusted and 1.80 Adjusted). Due to COVID-19 and the associated shutdowns, the town did not meet the timeliness of expenditure test. Moving forward into FFY 2021, the town faces the challenge of meeting this test as it has a backlog of projects to complete (and funds to expend) and continues to face staffing issues and shortages with key personnel. It will be critical to prepare construction projects for spring start dates in 2022 and to ensure timely submission of public service agency reimbursements to expend funds. The high level of funding in the LDC revolving loan fund remains a critical concern now that HUD is testing both the Unadjusted and Adjusted balances for compliance with timeliness of expenditure requirements. Reviews are also undertaken to monitor the 70% Low/Mod benefit requirement. Construction activities are also monitored for compliance with Davis Bacon Act (prevailing wage) requirements. Prevailing wage rate schedules, Section 3 data collection forms. And MWBE good faith effort forms are included in each bid package. Contractors submit certified payrolls (Form WH-347) that may be randomly supplemented with field interviews by Town of Union staff. Due to COVID-19 and health/safety restriction, field interviews were not conducted in FFY 2020.

### ***Documentation of National Objective:***

***Direct Benefit:*** Subrecipients are asked if and how client income is verified. The subrecipient is asked to show documentation, such as a W-2 form or pay stub, from a randomly selected client. Proof of eligibility for other programs, such as reduced and free school lunches, that have income levels at or below that of CDBG, are also accepted.

***Limited Clientele:*** The client is qualified by "Presumed Benefit" if they are abused children, battered spouses, elderly, homeless, illiterate adults, persons living with AIDS, disabled adults, or migrant farm workers. Subrecipients are asked to show proof that the client is in one of these groups.

***Area Benefit:*** The activity benefits all the residents of an area that is primarily residential and where at least 51 percent of the residents are of low to moderate income. This is determined by use of Census data prior to the site-monitoring visit.

***Financial Management:*** The subrecipient is asked if a separate budget or line item is kept for CDBG funds. A randomly selected financial report submitted with the payment request is reviewed prior to the site visit. The subrecipient is asked to show invoices, receipts, time sheets, etc. to support the report. The subrecipient is asked if financial and activity records are kept in an automated information system. They are asked what files, datasets, or software are used. If the records are maintained on paper, they are asked if the records are readily available and arranged in a logical order. The subrecipients are asked how long records are kept.

**Procurement:** Durable goods purchased with CDBG funds are observed to determine if the items delivered correspond to purchase orders or invoices. When reviewing purchase orders, checks, etc. it is determined if signatures are from authorized officials.

**Citizen Participation Plan 91.105(d); 91.115(d)**

**Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.**

A notice was published in the local newspaper (Press & Sun Bulletin) on Saturday, December 4<sup>th</sup>, 2021 announcing the availability of the CAPER on that same day for public comment. The notice provided the required minimum 15-day comment period. A public notice was also posted on the Town of Union web page ([www.townofunion.com](http://www.townofunion.com)) on Friday, December 3<sup>rd</sup>, 2021. The notice included instructions on obtaining both physical and digital copies of the report. The public will also provide an opportunity for the public to comment at the December 21<sup>st</sup>, 2021 Town Board meeting during the Hearing of Visitors portion of the agenda.

**CR-45 - CDBG 91.520(c)**

**Specify the nature of, and reasons for, any changes in the jurisdiction’s program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.**

The town has not made any major changes in program objectives during the past fiscal year. No changes to program objectives are proposed at this time. Changes to the HIP and FTHB programs were included in the 2020-2024 Consolidated Plan and FFY 2020 Annual Action Plan.

**Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?**

No.

**[BEDI grantees] Describe accomplishments and program outcomes during the last year.**

Does not apply.