

DRAFT

TOWN OF UNION NEW YORK

Prepared By: Town of Union Department of Planning
3111 E. Main St. | Endwell, NY 13760
Sara Zubalsky-Peer, Planning Director
Amber Jacobson, Community Development Coordinator

**FEDERAL
FISCAL YEAR
2018
CONSOLIDATED
ANNUAL
PERFORMANCE
& EVALUATION
REPORT**



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 October 2019 report, three hundred and fourteen (314) households were under lease through the Town of Union's Section 8 Housing Choice Voucher program.

Homeownership

During the course of the past year, the Town of Union assisted two (2) low or moderate-income households in the purchase of a single-family home. \$6,223.00 in owner equity and \$154,520.00 in bank financing/seller concessions through the use of \$10,850.00 CDBG funds. The town leveraged \$14.80 for each CDBG dollar spent.

Preservation of Housing Stock

Using \$34,628 (including project delivery costs of \$650.00) in CDBG funding, the town assisted nine (9), (five (5) ongoing and four (4) new), low to moderate-income single-family homeowners with home repairs.

Elderly Housing/Support

The First Ward Action Council completed minor home improvements/repairs for 71 seniors during the program year utilizing \$20,000.00 in CDBG funds.

Special Needs/Support

The Town of Union provided \$2,250 in CDBG funds to ACHIEVE in support of its Summer Program which serves youth with special needs.

Homeless Housing and Support Services

\$20,500.00 in CDBG funds were provided to Catholic Charities in support of its Teen Transitional Living Program which serves runaway teens.

Neighborhood Preservation

\$324,820.73 in CDBG funds were expended, as of November 18th, 2019, for reconstruction of the

following streets in CDBG eligible census tracts: Exchange Avenue (W. Valley Street to W. Edward Street) in Endicott, NY, and Grand Avenue (Elizabeth Street to Helen Street) in Johnson City, NY. There were no demolition projects during the 2018 program year.

Public Services

Ten (10) organizations were assisted with \$136,988.03 (approximately 9.87% in overall expenditures as of 11/18/19) 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.

ADA Enhancements

There were no funds expending during the current reporting year for this purpose.

Historic Preservation

There were no funds expended during the current reporting year for this purpose.

Economic Sustainability

\$110,501.60 was expended for Economic Development technical assistance including project delivery costs. The Town of Union Local Development Corporation did not close any loans during this program year. 19 full-time jobs were created during FFY 2018. 7 low-income persons, 4 very-low income persons, 4 extremely-low income persons, and 4 non-low/moderate income persons were hired.

Fair Housing Education

\$492.00 in CDBG funding was expended for Fair Housing Education Outreach (FHEO) advertising.

Lead Based Paint Education

Lead paint education brochures were distributed to all participants of the First Time Homebuyer, Home Improvement, and Section 8 Housing Choice Voucher programs.

Program Administration

\$167,358.91 was expended for administrative/planning costs (12.17% of total expenditures as of 11/18/19).

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	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Flood Recovery	Non-Housing Community Development	HUD CDBG-DR: \$3244233 / NY Rising Community Reconstruction Program: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1	0	0.00%			
Flood Recovery	Non-Housing Community Development	HUD CDBG-DR: \$3244233 / NY Rising Community Reconstruction Program: \$	Other	Other	0	0		1	0	0.00%
Grant Administration /Oversight	Grant Administration	CDBG: \$	Other	Other	1	0	0.00%	1	0	0.00%
Low/Mod Job Creation	Non-Housing Community Development	CDBG: \$	Jobs created/retained	Jobs	25	0	0.00%	5	0	0.00%
Neighborhood Preservation	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	3297		2005	3297	164.44%
Neighborhood Preservation	Non-Housing Community Development	CDBG: \$	Buildings Demolished	Buildings	5	0	0.00%	3	0	0.00%
Neighborhood Preservation	Non-Housing Community Development	CDBG: \$	Housing Code Enforcement/For enclosed Property Care	Household Housing Unit	5	0	0.00%			
Neighborhood Preservation	Non-Housing Community Development	CDBG: \$	Other	Other	10	0	0.00%			
Owner Occupied Housing Rehabilitation	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	50	6	12.00%	10	6	60.00%
Provide Assistance To	Affordable Housing	CDBG: \$	Direct Financial Assistance to Homebuyers	Households Assisted	25	0	0.00%	5	0	0.00%

First Time Home Buyers										
Provide Housing Services To The Elderly	Affordable Housing	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		60	0	0.00%
Provide Housing Services To The Elderly	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	300	0	0.00%			
Provide Public Services Targeted To The Elderly	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	12705	1440	11.33%	3660	1440	39.34%
Provide Public Services Targeted to Youth	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	3700	647	17.49%	655	647	98.78%
Provide Rental Assistance To VLI Households	Affordable Housing	Section 8: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	1750	0	0.00%	350	0	0.00%
Provide Services To Homeless Persons/Families	Homeless	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		12	0	0.00%
Provide Services To Homeless Persons/Families	Homeless	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	175	0	0.00%			
Provide Services To Homeless Persons/Families	Homeless	CDBG: \$	Homelessness Prevention	Persons Assisted	800	0	0.00%			
Provide Services To The Disabled	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	30		37	30	81.08%
Provide Services To The Disabled	Non-Housing Community Development	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	75	0	0.00%			

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 has met the 5 year goals outlined in the Consolidated Plan for most activities. Final accomplishment data for several economic development, public service, and housing activities was not received and entered into IDIS until shortly after the close of the year-end reporting period. This data will be included in the FFY 2019 report.

Expenses for the Housing Choice Voucher program, Governor's Office of Storm Recovery (GOSR), and Community Development Block Grant-Disaster Recovery (CDBG-DR) programs are not tracked through the IDIS reporting system.

The Housing Choice Voucher program is the sole funding source for providing rental assistance to low and very-low income persons. 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 declined due to a larger than normal number of persons leaving the program for a variety of reasons. Approximately 59% of persons leased under the program are either elderly or disabled and approximately 48% are families with children. 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. This increase is directly related to a lack of funding for staffing resulting from HUD's pro-rating (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 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 CBDG-DR program are reported through HUD's Disaster Recovery Grant Reporting System (DRGRS). As of November 2019, the town has expended approximately \$9,335,135.00 of the \$10,137,818.00 grant award and expects to expend the remainder of the grant by the end of the 2020 construction season.

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	2,571
Black or African American	194
Asian	24
American Indian or American Native	2
Native Hawaiian or Other Pacific Islander	3
Total	2,794
Hispanic	28
Not Hispanic	2,766

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 at 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	1,378,669	847,101
Section 8	public - federal	1,256,288	1,281,921
Other	public - federal	3,244,233	1,917,478

Table 3 - Resources Made Available

Narrative

The primary financial resources available during the program year included the FFY 2018 CDBG annual grant, remaining prior year CDBG funds, Housing Choice Voucher funds, CDBG-DR funding, and NY-Rising funding from New York State through the Governor's Office of Storm Recovery.

The figure shown as expended for the Section 8 Housing Choice Voucher program included \$1,099,698.00 in Housing Assistance Payments (HAP) and \$182,223.00 in administrative expenses for the period January 1, 2019 through October 30, 2019.

The figure shown as "Other" represents expenses paid through the town's CDBG-DR grant for the period October 1, 2017 through September 30, 2019.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
CDBG eligible Low/Mod Census Tract Block Group or Service Area	50		CDBG eligible Low/Mod Census Tract 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. Infrastructure projects are limited to eligible CDBG services areas. All infrastructure improvement projects were completed in CDBG target areas within the villages of Endicott (Exchange Avenue- W. Edward Street to W. Valley Street) and Johnson City (Grand Avenue-Helen Street to Elizabeth Street).

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.

In FFY 2018, the First Time Homebuyer program leveraged \$14.80 for each CDBG dollar expended. The Economic Development loan program did not close any loans during FFY 2018.

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	150	0
Number of Non-Homeless households to be provided affordable housing units	350	0
Number of Special-Needs households to be provided affordable housing units	60	0
Total	560	0

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	350	314
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	70	9
Number of households supported through Acquisition of Existing Units	0	0
Total	420	323

Table 6 – Number of Households Supported

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

The Home Improvement program progress was somewhat constrained in the current program year by the transition of staff members. Housing Choice Voucher program leasing rates during the program year were lower due to HUD's continued pro-ration of administrative fees owed to PHA's, which has continuously reduced staff levels. 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 chronic withholding of earned administrative fees has significantly limited efforts to fill key vacancies and upgrade software capabilities that would

ultimately reduce operating costs for items such as printing and postage, and would reduce the amount of time that staff spends responding to verbal requests regarding waiting list status.

Discuss how these outcomes will impact future annual action plans.

No changes are planned based on current reporting data.

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.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	14	0
Low-income	43	0
Moderate-income	21	0
Total	78	0

Table 7 – Number of Households Served

Narrative Information

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.

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 COC2.

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 COC2.

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 (2017) rated the town as a "High Performer".

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 are currently working on an update of the AI which is expected to be completed in 2020. 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 not received notice of any complaints filed since the 2014 AI update.

The AI identified multiple programs and activities already in place to further fair housing and promote affordable housing opportunities. These activities involve partnerships among the town, financial institutions, and community organizations.

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 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, participation in local trade shows, neighborhood town meetings, local conferences, and workshops.

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 public service announcements, advertisements, and in flyers used as part of the Section 8 Housing Choice Voucher

Program briefing packet. Approximately 40 Section 8 families received such counseling this year. The Town of Union and the villages of Endicott and Johnson City have taken positive steps to foster access for the disabled by extensive remodeling of public buildings and through the provision of services for people with hearing and vision disabilities.

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 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 five-year and annual action plans included poor credit histories, lack of down payment/closing cost funds, and the inability to save for future repairs. The town's First Time Homebuyer Program addresses these potential barriers by providing funds for closing costs and in some cases subsidies to lower the purchase price of homes. The town also makes funds available to participants for rehabilitation projects. The town also 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 was awarded CDBG funds by HUD as a certified housing counseling agency to provide counseling services to participants in the town's homeownership program. 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 town inspectors 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.

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.

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. There does not appear to be any gaps in institutional structure at this time.

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 recent American Community Survey data and most recent Home Mortgage Disclosure Act (HMDA) reports found no impediments to fair housing choice. The lack of discrimination complaints filed locally or with New York State or the federal government suggests a lack of housing choice limitations. 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, 2019 (0.94 Unadjusted and 1.38 Adjusted) and the town was in compliance with both the Unadjusted and Adjusted ratios. 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 and Section 3 data collection 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.

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 Sunday, December 1st, 2019 announcing the availability of the CAPER on Monday, December 2nd, 2019 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) on Wednesday, November 27th, 2019. 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 18th, 2019 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 significant changes are proposed at this time. It should be noted that the town's Planning Director Paul Nelson, who oversaw the CDBG program for the past 18 years, retired at the end of December 2018. The Town Board appointed the former Community Development Coordinator, Sara Zubalsky-Peer, as the new Planning Director effective 12/31/18. The Town Board approved the hire of Amber Jacobson as the new Community Development Coordinator effective 3/11/2019.

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.

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 significant changes are proposed at this time. It should be noted that the town's Planning Director Paul Nelson, who oversaw the CDBG program for the past 18 years, retired at the end of December 2018. The Town Board appointed the former Community Development Coordinator, Sara Zubalsky-Peer, as the new Planning Director effective 12/31/18. The Town Board approved the hire of Amber Jacobson as the new Community Development Coordinator effective 3/11/2019.

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.