

Town of Union Federal Fiscal Year 2016 Consolidated Annual Performance & Evaluation Report (CAPER)

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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 November 1, 2017, 326 households were under lease in the town's Section 8 Housing Choice Voucher program.

Homeownership

During the past year, the Town of Union assisted 3 low or moderate-income households in the purchase of a single-family home. \$67,460 in participant owner equity/seller concessions and \$205,231 in bank financing through the use of \$16,796 in CDBG funds. The town leveraged \$16.36 for each CDBG dollar spent.

Preservation of Housing Stock

Using \$162,198 (including project delivery costs) in CDBG funding, the town assisted 18 low/mod-income single-family homeowners with home repairs.

Elderly Housing/Support

The First Ward Action Council completed minor home improvements/repairs for 63 seniors during the program year utilizing \$13,500 in CDBG funds.

Special Needs/Support Services

The town provided CDBG funding to Catholic Charities in support of its Teen Transitional Living Program which serves runaway teens.

Homeless Housing and Support Services

\$30,000 in CDBG funding was used to replace the kitchen at the SOS Shelter.

Neighborhood Preservation

\$255,749 in CDBG funds was expended for reconstruction of the 800 block of Broad St. in Endicott which is located in an CDBG eligible census tract.

Safety improvements at Logan Field in the Village of Endicott were completed utilizing \$39,128 in CDBG funding.

There was one demolition project in the current program year. Utilizing \$124, 800 in CDBG funding, the town partnered with Broome County (\$53,940 leveraged) and the Broome County Land Bank (\$50,000 leveraged) to demolish a flood damaged condemned building at 1605 Davis Ave. in Endwell.

Public Services

Twelve agencies were assisted with \$123,764 (8.63% of overall expenditures) in CDBG public service funding. Criteria used in selecting agencies for funding include the community needs to be addressed by the 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 expended during the current reporting year.

Historic Preservation

There were no funds expended during the current reporting year.

Economic Sustainability

\$500,348 was expended for Economic Development activities including project delivery costs. The three Economic Development loans made during FFY 2016 leveraged \$5.90 for each CDBG dollar expended.

Fair Housing Education

\$1,251 in CDBG funding was expended for FHEO outreach advertising which ran for four days in the Press & Sun Bulletin.

Lead Based Paint Education

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

Program Administration

\$123,876 (8.64% of overall expenditures) was expended for administrative costs.

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
2015 Goal - Flood Recovery	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1	1	100.00%	
2015 Goal - Grant Administration/Oversight	Grant Administration		Other	Other	1	1	100.00%	
2015 Goal - Low/Mod Job Creation	Non-Housing Community Development		Jobs created/retained	Jobs	25	3	12.00%	25
2015 Goal - Low/Mod Job Creation	Non-Housing Community Development		Businesses assisted	Businesses Assisted	5	2	40.00%	5

2015 Goal - Neighborhood Preservation	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	1510		
2015 Goal - Neighborhood Preservation	Non-Housing Community Development		Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		
2015 Goal - Neighborhood Preservation	Non-Housing Community Development		Buildings Demolished	Buildings	5	2	40.00%	5
2015 Goal - Neighborhood Preservation	Non-Housing Community Development		Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	5	5	100.00%	
2015 Goal - Neighborhood Preservation	Non-Housing Community Development		Other	Other	10	2	20.00%	
2015 Goal - Owner Occupied Housing Rehabilitation	Affordable Housing		Homeowner Housing Rehabilitated	Household Housing Unit	50	10	20.00%	50
2015 Goal - Provide Assistance To First Time Home Buyers	Affordable Housing		Direct Financial Assistance to Homebuyers	Households Assisted	25	8	32.00%	25
2015 Goal - Provide Housing Services To The Elderly	Affordable Housing		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		
2015 Goal - Provide Housing Services To The Elderly	Affordable Housing		Homeowner Housing Rehabilitated	Household Housing Unit	300	62	20.67%	
2015 Goal - Provide Public Services Targeted To The Elderly	Non-Housing Community Development		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	12705	6263	49.30%	
2015 Goal - 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	1900		3700
2015 Goal - Provide Public Services Targeted to Youth	Non-Housing Community Development		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	3700	24	0.65%	
2015 Goal - Provide Rental Assistance To VLI Households	Affordable Housing		Tenant-based rental assistance / Rapid Rehousing	Households Assisted	1750	667	38.11%	
2015 Goal - Provide Services To Homeless Persons/Families	Homeless		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	175	175	100.00%	175
2015 Goal - Provide Services To Homeless Persons/Families	Homeless		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		
2015 Goal - Provide Services To Homeless Persons/Families	Homeless		Homeless Person Overnight Shelter	Persons Assisted	175	175	100.00%	175

2015 Goal - Provide Services To Homeless Persons/Families	Homeless		Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0		0
2015 Goal - Provide Services To Homeless Persons/Families	Homeless		Homelessness Prevention	Persons Assisted	800	0	0.00%	
2015 Goal - Provide Services To The Disabled	Non-Housing Community Development		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	37		
2015 Goal - Provide Services To The Disabled	Non-Housing Community Development		Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	75	0	0.00%	
2016 Goal - Flood Recovery	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1	1	100.00%	
2016 Goal - Grant Administration/Oversight	Grant Administration		Other	Other	1	1	100.00%	
2016 Goal - Low/Mod Job Creation	Non-Housing Community Development		Jobs created/retained	Jobs	25	3	12.00%	3
2016 Goal - Low/Mod Job Creation	Non-Housing Community Development		Businesses assisted	Businesses Assisted	1	3	300.00%	1
2016 Goal - Neighborhood Preservation	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	1510		
2016 Goal - Neighborhood Preservation	Non-Housing Community Development		Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		
2016 Goal - Neighborhood Preservation	Non-Housing Community Development		Buildings Demolished	Buildings	1	2	200.00%	1
2016 Goal - Neighborhood Preservation	Non-Housing Community Development		Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	5	5	100.00%	
2016 Goal - Neighborhood Preservation	Non-Housing Community Development		Other	Other	10	1	10.00%	
2016 Goal - Owner Occupied Housing Rehabilitation	Affordable Housing		Homeowner Housing Rehabilitated	Household Housing Unit	10	18	180.00%	10
2016 Goal - Provide Assistance To First Time Home Buyers	Affordable Housing		Direct Financial Assistance to Homebuyers	Households Assisted	5	2	40.00%	5
2016 Goal - Provide Housing Services To The Elderly	Affordable Housing		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		
2016 Goal - Provide Housing Services To The Elderly	Affordable Housing		Homeowner Housing Rehabilitated	Household Housing Unit	70	62	88.57%	

2016 Goal - Provide Public Services Targeted To The Elderly	Non-Housing Community Development		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	12705	6263	49.30%	
2016 Goal - 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	1900		1900
2016 Goal - Provide Public Services Targeted to Youth	Non-Housing Community Development		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	3700	24	0.65%	
2016 Goal - Provide Rental Assistance To VLI Households	Affordable Housing		Tenant-based rental assistance / Rapid Rehousing	Households Assisted	1750	0	0.00%	
2016 Goal - Provide Services To Homeless Persons/Families	Homeless		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	175		175
2016 Goal - Provide Services To Homeless Persons/Families	Homeless		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		
2016 Goal - Provide Services To Homeless Persons/Families	Homeless		Homeless Person Overnight Shelter	Persons Assisted	175	175	100.00%	175
2016 Goal - Provide Services To Homeless Persons/Families	Homeless		Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0		0
2016 Goal - Provide Services To Homeless Persons/Families	Homeless		Homelessness Prevention	Persons Assisted	800	0	0.00%	
2016 Goal - Provide Services To The Disabled	Non-Housing Community Development		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	37		
2016 Goal - Provide Services To The Disabled	Non-Housing Community Development		Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	75	0	0.00%	
Flood Recovery	Non-Housing Community Development	CDBG-DR State: \$9600000 / CDBG-DR: \$5369476	Other	Other	1	1	100.00%	1
Grant Administration/Oversight	Non-Housing Community Development	CDBG: \$179565	Other	Other	1	1	100.00%	1
Low/Mod Job Creation	Non-Housing Community Development	CDBG: \$245000	Jobs created/retained	Jobs	5	3	60.00%	8
Neighborhood Preservation	Non-Housing Community Development	CDBG: \$560000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	10440		1745
Neighborhood Preservation	Non-Housing Community Development	CDBG: \$560000	Buildings Demolished	Buildings	0	1		3

Owner Occupied Housing Rehabilitation	Affordable Housing	CDBG: \$95000	Homeowner Housing Rehabilitated	Household Housing Unit	10	13	130.00%	10
Provide Assistance To First Time Home Buyers	Affordable Housing	CDBG: \$50000	Direct Financial Assistance to Homebuyers	Households Assisted	5	2	40.00%	5
Provide Housing Services To The Elderly	Affordable Housing	CDBG: \$18000	Homeowner Housing Rehabilitated	Household Housing Unit	60	53	88.33%	60
Provide Public Services Targeted To The Elderly	Non-Housing Community Development	CDBG: \$66500	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2541	1910	75.17%	3949
Provide Public Services Targeted to Youth	Non-Housing Community Development	CDBG: \$48500	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	740	485	65.54%	3295
Provide Rental Assistance To VLI Households	Affordable Housing	Section 8: \$1320000	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	350	326	93.14%	375
Provide Services To Homeless Persons/Families	Homeless	CDBG: \$20000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	16	16	100.00%	12
Provide Services To The Disabled	Non-Homeless Special Needs	CDBG: \$7000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	15	36	240.00%	68

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 on track to meet the 5 years goals 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 the first year reporting period. This data will be included in the FFY 2017 report.

Expenses for both the Housing Choice Voucher program and the CDBG-DR program 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 60% of the persons leased under the program are either elderly or disabled. 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 increased significantly. 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 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 CDBG-DR program are reported

through HUD's Disaster Recovery Grant Reporting System (DRGRS). The town has expended approximately 64% of this \$10,137,818 grant award and expects to expend roughly 80% of the grant before the end of the 2018 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	8,041
Black or African American	841
Asian	197
American Indian or American Native	69
Native Hawaiian or Other Pacific Islander	11
Total	9,159
Hispanic	81
Not Hispanic	9,078

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

Narrative

The chart listed above identifies beneficiaries by race and ethnicity.

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	CDBG	1,301,095	1,434,276
HOME	HOME		
HOPWA	HOPWA		
ESG	ESG		
Section 8	Section 8	1,320,000	1,523,241
Other	Other	14,969,476	769,052

Table 3 - Resources Made Available

Narrative

The primary financial resources available during the program year included the FFY 2016 CDBG annual grant, remaining prior year CDBG funds, Housing Choice Voucher funds, CDBG-DR funding, and NY Rising funding from New York State.

The figure shown as expended for the Section 8 program includes \$1,278,265 in Housing Assistance payments and \$244,976 in administrative expenses. The figure shown as "Other" represents expenses paid through the town's CDBG-DR grant.

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	46	CDBG eligible Low/Mod CensusTract Block Group or Service Area
Townwide	50	54	Geographic area includes the entire town.

Table 4 – Identify the geographic distribution and location of investments

Narrative

First Time Home Buyer and Home Improvement program funds may be utilized anywhere in the town. Infrastructure projects are limited to eligible CDBG service areas.

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 2016, the First Time Home Buyer program leverage \$16.36 for each CDBG dollar expended. The Economic Development loan programs leveraged \$5.90 for each CDBG dollar expended.

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	150
Number of Non-Homeless households to be provided affordable housing units	365	326
Number of Special-Needs households to be provided affordable housing units	60	60
Total	575	536

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	375	326
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	70	81
Number of households supported through Acquisition of Existing Units	5	2
Total	450	409

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 that was somewhat constrained in the previous program year by the loss of a staff person is now back on track. Housing Choice Voucher program leasing rates were lower due to HUDs continued pro-ration of administrative fees owed to PHAs which has 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 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 has to expend responding to verbal requests for updates on waiting list status.

Discuss how these outcomes will impact future annual action plans.

No changes are planned based upon 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	0	0
Low-income	5	0
Moderate-income	5	0
Total	10	0

Table 7 – Number of Households Served

Narrative Information

The results listed above are only for the First Time Home Buyer program.

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.

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. The town has also funded a number of capital improvements at a local shelter for victims of domestic violence utilizing CDBG funding

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, 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, 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 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 Section 8 (Housing Voucher Program) only.

Actions taken to provide assistance to troubled PHAs

The Town's PHA (NY505) is Housing Choice Voucher program only and is not rated as Troubled.

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)

A full update of the Analysis of Impediments (AI) was completed in October of 2014. This report included outreach to community agencies, lending institutions, and the public, as well as a thorough analysis of census data, Home Mortgage Disclosure Act (HMDA) data from banks, and local housing and land use policies.

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/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 Analysis of Impediments (AI) identified many programs and activities 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, housing rehabilitation programs, first-time homebuyer programs, public services, and neighborhood revitalization activities. These programs are aimed at assisting low and moderate-income residents with housing and related needs.

The Town of Union's Department of Planning, in its capacity as the fair housing office, conducts outreach regarding fair housing issues and affordable housing opportunities. Outreach efforts may include mailings to community groups and interested parties, media advertising, presentations to community groups, and participation in local trade shows, neighborhood town meetings, local conferences, and workshops. The 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 briefing package. Each year, approximately 75 Section 8 families receive such counseling. 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 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 include poor credit histories, lack of down payment/closing cost funds, and inability to save for future repairs. The town's first time homebuyer program addresses these potential barriers by providing funds for closing costs, rehabilitation, and in some cases, subsidies to lower the purchase price of homes. The town also recognizes the importance of homeowner counseling, not solely for households with credit problems, but also for all potential homebuyers as a tool to understanding the responsibilities of homeownership. During the past fiscal year, Metro Interfaith was awarded CDBG funds 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 Home Buyer, 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 Home Buyer program applicants.

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 are consistent with an overall goal to reduce poverty and to develop a viable urban community by providing decent housing, a suitable living environment, and expanded economic opportunities principally for low and very low income persons. Some specific programs that are 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 such needs as 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 and North Side Villa) assist special needs low-income populations such as elderly populations.

All of the above 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, job counseling and employment programs, youth development, 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.

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 federal funding it receives, there also is 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. In addition to collaborative efforts involving the town, there have been a number of collaborative initiatives facilitated by other organizations within the community. 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 the disabled population. 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 1, 2017 (1.21 Unadjusted and 1.59 Adjusted) and the town was in compliance with the Unadjusted ratio but did not meet the Adjusted ratio due to the ongoing large amount of unexpended cash in the Local Development Corporation (LDC) Revolving Loan Fund. The high level of funding in the LDC revolving loan fund is a critical issue now that HUD is testing both the Unadjusted and Adjusted balances for compliance with timeliness of expenditure requirements. The Planning Director met with the Town Board on September 6, 2017 to review the status of a number of CDBG and CDBG-DR projects and to advise the members of the new method that HUD is using when calculating timeliness compliance. The board members were advised that revisions should be made to the subrecipient agreement with the LDC that would allow the town to move funds out of the revolving loan fund to other CDBG eligible activities if it appears that the town may not meet the timeliness requirement. Reviews are also undertaken to review 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 in each bid package. Contractors submit certified payrolls (Form WH-347) that may be randomly supplemented with field interviews.

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.

Record Keeping: 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.

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.

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 Monday, November 27th announcing the availability of the CAPER on December 4th 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). The notice included a link to the report. The public was also provided with an opportunity to comment at the December 20, 2017 Town Board meeting during the Hearing of Visitors portion of the agenda. No comments were received at the Town Board meeting prior to the approval of the report.

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 nor are any significant changes proposed at this time.

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

No

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