

FFY 2024

Consolidated Annual Performance and Evaluation Report
(CAPER)

Community Development Block Grant (CDBG)

Submitted to:

The U.S. Department of Housing and Urban Development (HUD)

Submitted by:

Borough of Berwick
1800 North Market Street
Berwick, PA 18603

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.

Highlighted in the FFY 2021-FFY 2025 Consolidated Plan and the FFY 2024 Annual Action Plan, the following items were noted as either low or high priority areas:

Housing Priority - (High Priority)

There is a need to improve the quality of the housing stock in the Borough of Berwick, and to increase the supply of affordable, decent, safe, sound, and accessible housing for homeowners, renters, and homebuyers.

- **HS-1: Fair Housing** – Support education, enforcement/reporting, and/or evaluation/study of Fair Housing rights and other housing related topics relevant to the public
- **HS-2: Housing Stock** - Support efforts to create new units of affordable and/or accessible housing as well as maintain and improve the quality of older homes, including elimination of slum and blighting conditions

Other Special Needs Priority - (Low Priority)

There is a need for services and facilities for the youth, elderly, persons with disabilities, victims of domestic violence, persons with HIV/AIDS, and persons with special needs.

- **SN-1 Public Safety** – Improvement in the ability to respond to emergency situations
- **SN-2 Social Services** - Support social service programs and facilities for the youth, elderly, persons with disabilities, victims of domestic violence, persons with HIV/AIDS, and persons with other special needs

Community and Economic Development Priority - (High Priority)

There is a need to improve the public and community facilities, infrastructure, employment,

and the quality of life in the Borough of Berwick.

- **DV-1 Community Facilities** - Improve the parks, recreational centers, trails, bikeways, and public and community facilities through rehabilitation, new construction, and handicap accessibility improvements
- **DV-2 Infrastructure** - Improve infrastructure through rehabilitation, reconstruction, and new construction of streets, sidewalks, ADA curb cut ramps, sewer, water, storm water management, flood protection, bridges, green infrastructure, etc.
- **DV-3 Employment** - Support and encourage job creation, job retention, and job training opportunities as well as entrepreneurship and small business development.as well as entrepreneurship and small business development

Administration, Planning, and Management Priority - (High Priority)

There is a continuing need for planning, administration, management, and oversight of Federal, state, and local funded programs.

- **AM-1 Overall Coordination** - Provide program management and oversight for the successful administration of Federal, state, and local funded programs, including planning services for special studies, environmental clearance, fair housing, and compliance with all Federal, state, and local laws and regulations

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
AM-1 - Overall Coordination	Administration, Planning & Management	CDBG: \$45,768.00	Other	Other	5	2	40.00%	1	1	100.00%
DV-1 Community Facilities	Non-Housing Community Development	CDBG: \$201,750.98	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10250	10250	100.00%	1,145	0	0.00%
DV-2 Infrastructure	Non-Housing Community Development	CDBG: \$187,46.300	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10250	10250	100.00%	1,145	1,145	100.00%
HS-1 Fair Housing	Affordable Housing Public Housing Homeless	CDBG: \$00.00	Other	Other	1	1	100.00%	0	0	0.00%

HS-2 Housing Stock	Affordable Housing Public Housing Homeless Removal of Blight	CDBG: \$191,868.01	Buildings Demolished	Buildings	10	3	30.00%	8	8	100.00%
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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.

Community Development was given a high priority designation in the FFY 2021-2026 Consolidated Plan and FFY 2024 Annual Action Plan.

AM-1 Overall Coordination: Funds were utilized for the continued administration and operation of the Borough’s CDBG program.

DV-1 Community Facilities: The Borough did not close out the Sponsler Park Improvements activity. Substantial completion was achieved by October 31, 2025 with close-out anticipated by December 31, 2025 with 1,495 beneficiaries.

DV-2 Infrastructure: The Borough closed out the Washington Street Reconstruction activity in July 2025 with 10,250 beneficiaries.

HS-2 Housing Stock: The Borough continues on-going efforts with the Brough Codes Enforcement Office to document improvements with Borough limits of housing stock, property additions and upgrades, as well as to oversee enforcement of residential/building codes and ordinances. Activities of Codes Enforcement Officers, hours and summaries of various neighborhood and site-specific activities will continue. Such actions will serve the Borough to both alleviate spot blight locations, improve qualitative housing stock,

and promote Fair Housing.

The Borough closed out the Removal of Blighted Structures – Berwick Phase IV activity in August 2025. Eight structures were demolished, as reflected in the actual program year of “Demolished Buildings/Spot Blight”.

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	0
Black or African American	0
Asian	0
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
Total	0
Hispanic	0
Not Hispanic	0

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

Narrative

Berwick Borough did not fund any direct benefit activities in program year 2024.

The Borough of Berwick is not a HOME HUD entitlement. The Borough of Berwick does not receive HOPWA or ESG funding.

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	\$1,185,169.00	\$500,270.42

Table 3 - Resources Made Available

Narrative

SEDA-COG Administration: Administration of the CDBG program is ongoing. Allocations are made annually by Berwick Borough

Sponsler Park Improvements: The Borough held off on beginning the environmental review for this project until the substantial amendment was accepted in late January 2025. Once the environmental review was cleared in late April 2025, construction began with installing sidewalks, re-surfacing the basketball court, and erecting the amphitheater and shade structure. Installation of play equipment was delayed due to lead times on delivery. The final pieces were installed in October 2025 with close out anticipated in December 2025, utilizing FFY 2023 and 2024 funding.

Washington Street Reconstruction: Rising construction costs and change orders delayed initial construction of this project. While construction was substantially complete in November 2024, a significant rain event necessitated paving construction, which did not occur until May 2025 due to weather conditions. This project was closed out in July 2025, utilizing FFY 2021 and 2023 funding.

Removal of Blighted Structures – Berwick Phase IV: The demolition of eight properties was completed in August 2025, utilizing FFY 2022, 2023, 2024 funding.

Berwick Borough Code Enforcement: The Borough uses CDBG funds to help fund code enforcement activities. Most code enforcement activities and non-CDBG eligible activities are financed through local general funds. CDBG funds were utilized from FFY 2021 and 2022 for Code enforcement activities related to Removal of Blighted Structures – Berwick Phase IV.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Borough of Berwick	100%	100%	Allocation amounts are pre-determined by HUD

Table 4 – Identify the geographic distribution and location of investments**Narrative**

The geographic locations for the FFY 2024 CDBG activities are as follows (map attached):

- Administration – Borough Wide
- Sponsler Park Improvements – Census Tract 507, Block Group 1
- Washington Street Reconstruction – Census Tract 507, Block Group 1
- Removal of Blighted Structures – Berwick Phase IV (SBS)
- Code Enforcement – Borough Wide

LMA activities are assumed to benefit low to moderate income persons. SBS activities are a separate national objective.

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.

SEDA-COG Administration: The Borough utilizes its own general funds for miscellaneous CDBG efforts undertaken by its internal staff. Berwick Borough owns office facilities for its employees.

Sponsler Park Improvements: Project closure is anticipated in December 2025. The Borough utilized its own Public Works staff to provide construction, oversight, and support on this activity. Any activity expenditure beyond HUD CDBG allocations will be paid by local general fund. This park is publicly owned.

Washington Street Reconstruction: Project closure in July 2025 required no additional leveraged funding sources beyond HUD CDBG Allocations. Public Works staff, which provide various levels of oversight and support on an activity such as this, are paid in part through the Commonwealth of Pennsylvania's Liquid Fuels tax. This street is publicly owned.

Removal of Blighted Structures – Berwick Phase IV: Project closure in August 2025 required no additional leveraged funding sources beyond HUD CDBG allocations.

Berwick Borough Codes Enforcement: The Borough uses CDBG funds to help fund additional financing for code enforcement activities. Most code enforcement activities and non-CDBG eligible activities are financed through local general funds.

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	3	0
Number of Special-Needs households to be provided affordable housing units	0	0

	One-Year Goal	Actual
Total	3	0

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	3	0
Number of households supported through Acquisition of Existing Units	0	0
Total	3	0

Table 6 – Number of Households Supported

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

During this five-year Consolidated Plan, the Borough of Berwick is not funding any affordable housing activities with CDBG funds. The Borough typically utilizes HOME funds they receive from the Commonwealth of Pennsylvania to do housing rehabilitation activities over the five-year Consolidated Plan period. Due to ongoing investigations of the Borough's HOME program, no homes were rehabilitated during the program year 2024.

Discuss how these outcomes will impact future annual action plans.

In accordance with the Borough's Analysis of Impediments and through collaboration with SEDA-COG, updated programming and project development will be identified as promoting both Fair Housing initiatives and AFFH.

A Fair Housing Hub has been created on SEDA-COG's website. This Fair Housing Hub provides the public with information concerning a variety of affordable housing programs, financial assistance, links to weatherization, LGBTQ concerns, housing discrimination complaints, etc. SEDA-COG and the Borough will continue to publicize this information.

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	0	0
Moderate-income	0	0
Total	0	0

Table 7 – Number of Households Served

Narrative Information

The Borough did not provide funding for any projects during the FFY 2024 CDBG program year, including direct assistance to homeowners.

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 Borough's Citizen Participation Plan encourages consultation with local homelessness organizations during the development of various CDBG planning efforts. These organizations include:

- Beyond Violence, Inc.
 - Provides shelter for women and children that are victims of domestic violence.
 - Located in the Borough of Berwick
- Columbia/Montour Transitional Housing and Care Center
 - Provides emergency shelter and transitional housing
 - Located at the Gatehouse facility in the Borough of Danville
 - This is a nine-mile drive between Bloomsburg and Danville and a twenty-two-mile drive from Berwick to Danville
- Eastern Pennsylvania Continuum of Care
 - HUD program designed to promote regionwide commitment to the goal of ending homelessness
- The Women's Center, Inc.
 - Provides shelter for women and children that are victims of domestic violence.
 - Located in the Town of Bloomsburg

Beyond Violence, the Women's Center, and the Gatehouse all offer counseling programs to clients in an effort to assess their individual needs.

The Borough of Berwick participates in monthly Columbia County Human Service Coalition meetings, as a result of the Consolidated Planning effort. These meetings are also attended by the representatives of Beyond Violence, the Women's Center, and the Gatehouse, as well as other social service providers, to coordinate services, prevent duplication of efforts, share information, and promote networking. The town receives a monthly update from the providers listed above during the monthly Columbia County Human Service Coalition meetings about the status of their programs.

Additionally, a Homeless Task Force also meets monthly concerning issues related to the homeless and "at risk" homeless. This group is made up of representatives from the Columbia

County Housing Authority, religious organizations, women's shelters, the Gatehouse, CMSU, Central Susquehanna Opportunities, Inc. (the county's community action agency), the United Way of Columbia County, and the US Department of Agriculture. Currently, information updates regarding the Homeless Task Force are provided to the town of Bloomsburg at the meetings of the Columbia County Human Service Coalition.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Borough of Berwick's FFY 2020 - 2024 Analysis of Impediments Fair Housing Study provides the following strategies to address this housing need:

- Assess the need to provide additional emergency or transitional shelter, rapid rehousing, and homelessness prevention services in the Town and the region
 - Key Partners: Continuum of Care, Community Strategies Group, SEDA-Council of Governments, Columbia County Human Services Coalition (CCHSC)
- Submit a regional competitive ESG (Emergency Solutions Grant) application to DCED to fund the needs and solutions identified in the assessment
 - Key Partners: Continuum of Care, SEDA-Council of Governments

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

A variety of programs are established in Columbia County to help low-income individuals and families avoid becoming homeless. The Columbia County United Way and Berwick United Way, the Columbia County Family Center, Beyond Violence, and the Women's Center of Columbia/Montour Counties offer some form of budgeting or financial literacy class. The goals of these classes are for clients to learn how to earn money, manage it, and potentially invest it, and/or donate it to organizations or causes to help others. Successful money management is a critical skill for clients to develop in order to find and maintain housing which is affordable to their budget.

SEDA-COG Fair Housing activities have included links and brief discussion for renter information, housing discrimination filings, potential levels of discrimination within protected

classes being disseminated to over five-thousand points of contact within the SEDA-COG region. Additional Fair Housing informational outreach may include fundamental banking, realtor, and home-ownership points.

Numerous programs are also available for individuals and families recently discharged from a publicly funded institution or system of care. CMSU has established a Mental Health/Substance Abuse Housing Plan as required by the Pennsylvania Department of Public Welfare's Office of Mental Health and Substance Abuse Services (OMHSAS). This plan describes the status of and any modification to the county's efforts to enable adults and transition age individuals with serious mental illness to live, work, learn, and participate fully in their communities.

The county also has an established reentry program known as the Justice House program for prisoners who have been released back into the community. For individuals about to be released from a medical institution, hospitals must have written discharge policies that include evaluation of a patient's capacity for self-care and possibility of being cared for in "the environment from which he/she entered the hospital." The actual discharge varies with the individual being discharged, their primary and behavioral health needs, and resources and supports available. While social service and related social staffing organizations try to send individuals home or to a family member, sometimes they discharge to a nursing home, rehab hospital or as last resort, non-HUD funded shelter.

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 Borough of Berwick supports the efforts of local partner agencies to address the need for rapid rehousing.

CCHA's Homelessness Prevention and Rapid Re-Housing Program's aim is to provide financial assistance and services to minimize and prevent individuals and families from becoming homeless.

Beyond Violence in Berwick and the Women's Center of Columbia/Montour Counties in Bloomsburg both have counseling and programs to assist their clients with finding more permanent housing opportunities. The Women's Center of Columbia/Montour Counties holds focus groups on this topic and other related topics such as healthcare, budgeting, and

parenting. The Gatehouse also lists “securing affordable housing” as one of their shelter’s tenant goals for their residents.

Recent overtures and investment opportunities from private housing rehabilitation ventures have taken root within the Borough. Housing capitalists (house flippers) opened lines of communications relating to potential CDBG funding avenues in efforts to rebuild/rehabilitate properties within Borough boundaries. As private venture housing capitalists, action projects and inclusion within CDBG programming will require potential shift in utilization of CDBG funds and program goals envisioned within Borough leadership. Continuing to have conversations, developing business plans, and using private funding will enable both expansion of as well as site specific improvements to housing stocks. Said entrepreneurs have experience in purchasing properties which have been deemed dilapidated and overly expensive for personal rehabilitation. Several properties have been purchased and retrofitted (Zombie Houses) placing housing units/apartments in active roles. Notably, private investors have committed to LMI populations as being the focus of efforts and growth. These housing capitalists have set a target of 100 available units to be made available within five years (2030).

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

Actions taken to address the needs of public housing

The Borough of Berwick does not manage any public housing complexes. In Pennsylvania, public housing complexes are generally governed by a municipal authority, which is a separate government entity from a local, municipal government.

The Columbia County Housing Authority oversees the public housing complexes located in Columbia County, which the Borough of Berwick is a part of. The Columbia County Commissioners, a higher tier government entity from the Berwick Borough Council, is the governing board which has established the Columbia County Housing Authority.

However, the Borough of Berwick has begun to participate in the monthly Columbia County Human Service Coalition meetings, as a result of the Consolidated Planning effort. These meetings are also attended by the Columbia County Housing and Redevelopment Authority, as well as other social service providers, to coordinate services, prevent duplication of efforts, share information, and promote networking.

At current the Evan Owen Memorial Apartments are the sole Columbia County Housing Authority property. This property is located in Berwick.

In prior email correspondence with Lori Gordner, Deputy Director of the Columbia County Housing Authority, she described the improvement needs of their public housing units as minor and able to be updated with annual Capital Funds received from HUD.

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

The Columbia County Housing Authority manages their own programs and provides opportunities for their residents to participate in management and encourage homeownership. The Columbia County Housing Authority maintains a website (<https://www.cchrapa.org/>) to inform the public of the programs, projects, and housing opportunities that they provide. Landlord rights and responsibilities, Section 8 voucher programming and the Columbia County Redevelopment Authority are further evidence of housing outreaches. A public notice section is also located on this website to inform the public of any newsworthy developments at the Authority.

Due to the after-effects of the COVID-19 pandemic, there has been no coordinated effort to encourage public housing residents to become more involved in management. The Columbia

County Housing Authority does not administer a Public Housing Homeownership Program or a Section 8 Housing Choice Voucher Homeownership Program. These are voluntary programs that public housing authorities can choose to establish by notifying HUD and the public in the Annual Agency Plan and by creating administrative guidelines that meet HUD requirements. HUD approval of these local option programs does not increase funding to the public housing authority.

Actions taken to provide assistance to troubled PHAs

The Columbia County Housing Authority currently does not have a troubled designation. Additionally, the Borough of Berwick does not manage any public housing authorities.

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 following strategies have been accomplished to maintain existing affordable housing and create opportunities for new units of affordable housing, per the Borough of Berwick's FFY 2020 -2024 Analysis of Impediments Fair Housing Study:

- Created a link to the Fair Housing Hub on the Borough's website and promote the Fair Housing Hub through one mailing to inform residents and partners that it has been created
- Changed the zoning ordinance so that group care facilities are permitted by right in any single- family dwelling
- Included tenant rights information on the Fair Housing Hub
- Created a Fair Housing Hub on the SEDA-COG website and promote it to residents, municipalities, social services, government agencies, and housing and lending professionals
- Ensured that CDBG/HOME subrecipients fulfill the obligation to affirmatively further fair housing by including a clause in the contract and technical support
- Distribution of SEDA-COG Fair Housing Activity "Toolkit" among CDBG recipient clientele, municipal governments, regional social service agencies as well as public posting and links
- Created a link to Columbia County's utility assistance resources page from the Fair Housing Hub
- Included information about affordable housing programs on the Fair Housing Hub
- Included information about accessible housing programs on the Fair Housing Hub
- Continued to offer a housing rehabilitation program to income eligible homeowners
- Continued to address blight by allocating CDBG funding
- Have materials about utility assistance programs available at Borough City Hall
- Codes Enforcement Offices of Berwick generate monthly updates and activities of property updates, construction, rehabilitation, and renovations

The following strategies are an ongoing effort to maintain existing affordable housing and create opportunities for new units of affordable housing, per the Borough of Berwick's FFY 2020 - 2024 Analysis of Impediments Fair Housing Study

- Rezone underdeveloped land zoned R-1 to R-3 to allow for more density
- Publicize and promote an annual fair housing hearing to provide residents with the opportunity to ask questions and/or share concerns related to fair housing
- Consider accessible housing needs when allocating CDBG funding
- Continue to submit an annual right-to-know request to the PHRC and address any complaints that are received
- Participate in Berwick: The Next Step and support its projects
- Assess the accessibility of sidewalks and other public spaces and identify other public spaces generating community ADA compliance
- Prioritize ADA locations and project specific objectives within the Borough utilizing available CDBG funding
- Explore a relationship within the Berwick Art Association to aesthetically enhance localized community facades, parks, gathering points building AFFH initiatives
- Explore zoning and uses of abandoned community properties via public funding and/or support of private venture housing initiatives

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

Borough of Berwick, social service providers, and other various public and private sector partners continue to collaborate to address underserved needs. With funding resources being scarce, funding becomes the greatest obstacle for the Borough of Berwick to meet its underserved needs constituencies. Insufficient funding lessens the ability to fund many worthwhile public service programs, activities, and agencies. The Borough of Berwick, through its planning efforts, has used its limited resources to address its greatest needs and improve the quality of life for its residents. The following obstacles and corresponding actions have detrimentally affected meeting the underserved needs:

- Lack of decent, safe, sound, and affordable owner and renter housing
 - Aging housing stock reflecting aging population base may be reflected in maintenance
 - Limited availability of apartments being controlled by relatively few property owners
 - Limited local and county-wide public housing stock

- Limited dedicated personnel with Berwick Borough dedicated to research, identify and source multiple grant or funding programs to accentuate community development opportunities
 - SEDA COG and Borough staff reassess public infrastructure and housing prioritizations
- The borough continues to pursue and administer housing rehabilitation projects through HOME and Weatherization funds
- Aging-in-place population who need accessibility improvements
- The need for rehabilitation of the Borough of Berwick's aging housing stock
- Vacant and abandoned properties
 - Borough Council and Borough Codes department continue to identify properties which may be deemed unsafe, inhabitable, foreclosures leading to spot blight activity

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

For the CDBG and HOME Program rehab programs, all contracts entered after January 10, 2002, must comply with the Lead Based Paint Regulations dated September 15, 1999, for housing rehabilitation. These regulations include the requirement that all work performed on lead-containing surfaces must conform to lead-safe practices and be completed by workers who are either supervised by an EPA-certified abatement supervisor, or workers trained in lead-safe work practices. If abatement options are specified in the work writeup, then the contractor must hire an EPA-certified and state licensed abatement contractor and submit proof of the current state license.

The following requirements apply to federally funded housing rehabilitation:

Rehab where the costs range from \$1,000 to \$4,999:

- Provisions of the Protect Your Family From Lead in Your Home Pamphlet found at www.epa.gov/lead
- Paint testing
- Repair surfaces disturbed during rehabilitation
- Use lead safe work practices
- Clearance of the work site

Rehab where the costs range from \$5,000 to \$24,999:

- Provisions of the Protect Your Family From Lead in Your Home Pamphlet found at www.epa.gov/lead

- Paint testing and risk assessment
- Interim controls
- Use lead safe work practices
- Clearance of the unit

Rehab where the work exceeds \$25,000:

- Provisions of the Protect Your Family From Lead in Your Home Pamphlet found at www.epa.gov/lead
- Paint testing and risk assessment
- Abatement (interim controls on exterior surfaces not disturbed by rehab)
- Use lead safe work practices
- Clearance of the unit

Any housing rehabilitation projects undertaken by the Borough, utilize DCED's Housing Rehabilitation Guidebook created November 2020 and updated in October 2025. This guidebook was specifically created for projects financed with CDBG and/or HOME funds. The actions listed above were obtained from this literature.

SEDA-COG periodically reviews Berwick Borough's policies and procedures utilized to operate the various aspects of the borough's CDBG program, including policies and procedure relating to lead-based paint reduction. For program year 2024, the Borough of Berwick did not undertake rehabilitation, tenant based rental assistance, and/or property acquisition, which was supported by the CDBG program. The Borough of Berwick does adhere to the Lead-Based Paint Poisoning Prevention Act.

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

The resources and opportunities that the Borough of Berwick has for minimizing the number of families with incomes below the poverty line are limited. Since poverty is a function of income, its effect on housing opportunity and choice is apparent. Conversely, without adequate, stable housing, alleviating poverty is more difficult. Still, the means of addressing both issues are fragmented.

Several structural barriers to poverty are addressed through different local policies. For example, the Borough of Berwick has adopted a Section 3 Action Plan which requires the employment of Section 3 households in construction contracts when possible. Admittedly, contractors often already have the workforce necessary to complete a construction project though. However, the Borough encourages contractors awarded CDBG funded contracts to hire

Section 3 persons, making all opportunities for contracts known to Section 3 businesses, and requires contractors to report on Section 3 labor hours for each project.

Recent and current trends in housing rehabilitation have produced several private sector venture capital housing rehab initiatives. Private sector rehab opportunities have fostered dilapidated property purchases, rehabilitation, and end-user renting/leasing specific to LMI and poverty level families. Currently, Borough-wide property availability is limited; however, ownership objectives to manage dozens of units by 2030 remain achievable through realistic business planning and community-driven opportunities.

More direct efforts to alleviate poverty by combining case management, social services, job training, and housing assistance are more common through collaboration with the Columbia County Human Service Coalition. The Columbia Montour Chamber of Commerce also has developed relevant programming to include:

1. Facilitation of regular discussions between employers and educators to improve the teaching of real workplace skills; and
2. Foundational skills for unemployed and underemployed individuals with the potential expansion to include people on parole and/or leaving prison; and
3. A partnership with Bloomsburg University to develop team leadership and basic management skills in existing employees.

The goals of the FFY 2021-2025 Consolidated Plan concerning economic development include:

Community and Economic Development Priority - (High Priority)

There is a need to improve the public and community facilities, infrastructure, employment, and the quality of life in the Borough of Berwick.

- **DV-1 Community Facilities** - Improve the parks, recreational centers, trails, bikeways, and public and community facilities through rehabilitation, new construction, and handicap accessibility improvements
- **DV-2 Infrastructure** - Improve infrastructure through rehabilitation, reconstruction, and new construction of streets, sidewalks, ADA curb cut ramps, sewer, water, storm water management, flood protection, bridges, green infrastructure, storm water management, recreational/park improvements, aesthetic art improvements, etc.

- **DV-3 Employment** - Support and encourage job creation, job retention, and job training opportunities as well as entrepreneurship and small business development. Developing a continued relationship with PA CareerLink, Chamber of Commerce and private staffing firms to identify and fill employment referrals

Assignment of Priority Discussion:

High Priority - Activities are assigned a high priority if the Borough of Berwick will likely utilize CDBG funds to finance activities during the Five-Year Consolidated Plan period.

Low Priority - Activities are assigned a low priority if the activity may not be funded by the Borough of Berwick during the Five-Year Consolidated Plan period. The Borough of Berwick may support applications for other funding if those activities are consistent with the needs identified in the Five-Year Consolidated Plan.

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

The Borough of Berwick and SEDA-COG will coordinate activities amongst public and private agencies, and other organizations that serve the municipality. Due to the relatively small population of the Borough, many public and private agencies provide services on either a county or multi-county level. As a result of this administrative structure, the efforts to implement the strategies produced from this Five-Year Consolidated Plan will require greater cooperation across Columbia County.

In order to streamline efforts and promote greater local cooperation, the Borough will continue to collaborate with the Columbia County Human Service Coalition. This will facilitate and coordinate the linkages between these public/private partnerships, develop new partnership opportunities, and ensure that the goals and objectives of the Five-Year Consolidated Plan will be addressed by more than one agency.

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

Establishment of a public transportation system is among the greatest improvements that may occur to facilitate institutional and regional visibility of structures. Identified within the Borough's Analysis of Impediments as a potential hurdle limiting fair housing, growth of population as well as economic employment opportunities, a combined effort among regional

non-profits has continued development of “RabbitTransit.” Serving the Columbia County contiguous area, van-ride public transportation provides visibility, recognition of logo and knowledge of destination surety and safety.

Community Service organizations receive annual Fair Housing Activity offerings. In FFY 2025, SEDA-COG’s Community Development Department worked to address the Fair Housing goal of increasing public awareness of Fair Housing rights on behalf of its grantees. During Fair Housing month, SEDA-COG partnered with the PA Human Relations Commission (PHRC), to provide an in-person and interactive Fair Housing Fundamentals training for housing professionals in the region.

The Fair Housing Fundamentals training included an overview of the history of Fair Housing, relevant Fair Housing laws, protected classes, and discriminatory actions, as well as information on how to navigate both the reasonable accommodation and the Fair Housing complaint processes. Outreach included the Columbia County Human Services Coalition, Agape Fellowship, and Gatehouse; reach serving distinct population, yet reflective of LMI population bases.

Continued coordination between public and private services largely falls within currently identified agencies servicing the Columbia County contiguous region. Included within monthly and quarterly meetings have been Columbia County Family Center, Columbia County Children and Youth Services, Columbia County Juvenile Probation, Columbia Child Development Program/ Head Start, AGAPE, Gatehouse Shelter, Caring Communities, Central Susquehanna Opportunities Inc., Central Pennsylvania Workforce Development Corp. (CPWDC), The Women's Center Inc.

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

The following strategies have been accomplished to maintain existing affordable housing and create opportunities for new units of affordable housing, per the Borough of Berwick’s FFY 2020 - 2024 Analysis of Impediments Fair Housing Study:

- Created a link to the Fair Housing Hub on the Borough Website and promote the Fair Housing Hub through
- Changed the zoning ordinance so that group care facilities are permitted by right in any single-family dwelling
- Included tenant rights information on the Fair Housing Hub
- Created a Fair Housing Hub on the SEDA-COG website and promote it to residents, municipalities, social service and government agencies, and housing and lending professionals

- Ensured that CDBG/HOME subrecipients fulfill the obligation to affirmatively further fair housing by including a clause in the contract and technical support
- Created a link to Columbia County's utility assistance resources page from the Fair Housing Hub
- Created a link to SEDA-COG's weatherization program on the Fair Housing Hub
- Have materials about utility assistance programs available at Borough Hall
- Include information about affordable housing programs on the Fair Housing Hub
- Continued to offer a housing rehabilitation program to income eligible homeowners
- Continued to address blight by allocating CDBG funding
- Creation and distribution of Fair Housing Activity: Fair Housing Financial Awareness/Home Ownership Social Media” project throughout the Borough’s service region
- Developed involvement with regional transportation services, PA Department of Transportation to advance fixed and on-demand routes

The following strategies are an ongoing effort to maintain existing affordable housing and create opportunities for new units of affordable housing, per the Borough of Berwick’s FFY 2020 - 2024 Analysis of Impediments Fair Housing Study:

- Rezone underdeveloped land zoned R-1 to R-3 to allow for more density
- Rezone commercial blocks to allow potential 2nd/3rd floor residential accommodations
- Publicize and promote an annual fair housing hearing to provide residents with the opportunity to ask questions
- When opportunities arise, support public and private efforts to create new units of affordable housing
- Bring forward private housing rehabilitation endeavors within property rehabilitation efforts specifically affecting LMI populations
- Consider affordable housing needs when allocating CDBG funding
- Continue to submit an annual right-to-know request to the PHRC and address any complaints that are received
- Participate in Berwick: The Next Step and support its projects
- Access the accessibility of sidewalks and other public spaces and identify other public spaces and identify other priority projects
- Ensure that new multi-unit developments include accessible housing as required by the ADA

The following strategies are currently being evaluated for implementation in program year 2024, and beyond to maintain existing affordable housing and create opportunities for new units of affordable housing, per the Borough of Berwick's FFY 2020 - 2024 Analysis of Impediments Fair Housing Study:

- Update the PHA tenant guide to reflect protected classes and update the tenant guide as needed.
- Create an incentive to promote new units of affordable housing in this area.
- Change the definition of family in the zoning ordinance.
- Change the definition of disruptive conduct so that it excludes victims of domestic violence.
- Change the Landlord Registration Ordinance so that a license can be revoked after three violations involving the same occupant
- Establish a relationship between code enforcement staff and social service agencies that encounter housing quality issues so that the Borough can address landlords that are reluctant to make needed repairs
- Pass and enforce an Anti-Discrimination Ordinance
- Establish a relationship with a HUD-approved housing counseling agency to offer financial education including improving credit and a first-time homebuyer's program in the region
- Assess the need to provide additional emergency or transitional shelter, rapid rehousing, and homelessness prevention services in the Borough and the region.
- Establish a partnership between social service agencies and local banks to help them connect with, prepare, and assist first-time homebuyers
- Explore feasibility of creating a program that provides resources to help older adults age in place
- Explore the feasibility of incentivizing the creation of affordable and/or accessible housing on lots where blighted properties are razed
- Ensure that municipal staff have access to and understand fair housing educational materials so that these can be shared with the public as needed
- Inform the Local Center for independent Living (MyCIL) about new projects
- Participate in the manufactured housing task force
- Ensure that rentals owned by out-of-town landlords that have housing quality issues are addressed by code enforcement staff
- Participate in Fair Housing Month to raise awareness about fair housing rights and how to file complaints

- Report known hate group activity to the Southern Poverty Law Center which tracks such activity nationally
- Issue an annual proclamation to recognize someone who has made a positive contribution to fair housing in the local community during Fair Housing Week
- Provide funding to solutions that address predatory affordable housing options
- Organize outreach with materials in Spanish to connect with local Hispanic or Latino(a) mortgage applicants
- Implement site link within Borough website for Fair Housing, AFFH
- Develop a publicly accessible information point within Borough website and associated links highlighting steps toward family budgeting, savings, and goals of homeownership
- Distribute annual Fair Housing and AFFH information, minimally during April Fair Housing initiatives

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 Borough of Berwick has entered into a formal legal agreement with SEDA-COG to provide administration of the grant(s). SEDA-COG Community Development Staff manage project development and application preparation responsibilities including citizen participation requirements, preparation of the Consolidated and Annual Action Plans, and satisfaction of federal regulatory requirements related to plan submission, including the Consolidated Action Plan Evaluation Report (CAPER).

Specific grant administration responsibilities include assistance in record keeping and financial management (including preparation and approval of invoice forms and IDIS draws), contract review and finalization of project scope, project coordination, procurement; regular review of required policies/plans, preparation, approval, and submission of progress reports, and close-out/monitoring. Specific project management responsibilities to be carried out on a project-by-project basis include Labor Standards Enforcement and completion of the required Environmental Review(s).

The Borough of Berwick retains control of grant funds and retains overall control of the financial management system through invoice drawdown and preparation of bank drafts. After final execution of the contract between the Department of Housing and Urban Development (HUD) and the Borough of Berwick, SEDA-COG assists the Borough of Berwick in preparing the necessary contract documents. SEDA-COG shall set up, maintain, and requisition funds through the IDIS system. The Borough of Berwick, however, has final authority on the actual issuance of payment.

The chief elected official shall serve as the contact person between the Borough of Berwick and SEDA-COG in order to assist in the coordination of grant management activities. The Borough of Berwick council may also utilize other necessary expertise, at their discretion. Specific activities may require certain delivery services over and above the activities listed. HUD funds may be utilized to support archaeological, architectural, and/or engineering services, in addition to legal consultation.

SEDA-COG is an established Council of Governments created by eleven (11) counties with a mandate to provide planning and development assistance services to governments within its

region. The agency provides a variety of services and has a successful track record in community development, project development, and contract administration. SEDA-COG's Community Development Program is also an approved Commonwealth vendor under ITQ Solicitation No. 4400007410 and Vendor Contract No. 4400014141 for Technical Assistance – Federal Grant or Loan Programs. SEDA-COG is also a COSTARS Participating Member (No. 3186).

SEDA-COG's Community Development team consists of 16 experienced professionals and numerous support personnel, including secretarial, word and data processing, and graphics staff. Additional specialized technical expertise is available through other SEDA-COG program staff with credentials in business development, finance, accounting, design, construction management, inspection, and supervision.

SEDA-COG's Community Development team is comprised of the following individuals:

- Tyler Dombroski, Director
- Jamie Shrawder, Program Manager
- Angie Hunselman, Program Manager
- Leslie Hosterman, Program Analyst
- Hanorah Lucas, Program Analyst
- Tonia Troup, Program Analyst
- Carol High, Project Analyst
- Michelle Koslap, Program Analyst
- Larissa Hassinger, Program Analyst
- Nicole Hogan, Fiscal Manager
- Susan Shaffer, Fiscal Assistant
- Sarah Biddle, Administrative Assistant
- Andrea Genovese, Administrative Assistant
- Paige Campbell, Administrative Assistant
- Debra Lyons, Administrative Assistant
- Audrey Frederick, Administrative Assistant

The grant is managed by Leslie Hosterman, with supervision provided by Tyler Dombroski, Director of the Community Development Program at SEDA-COG. Collectively, team members have focused energies within the housing and community development field, successfully administering and completing over 1,000 federally funded projects during SEDA-COG's tenure and service agreements.

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 advertised in the *Press Enterprise*, the local newspaper of circulation, regarding review of the program year 2024 CAPER in order to invite public comments. The public hearing will be held during a regularly scheduled Borough Council meeting on December 1, 2025, was also provided in the notice.

SEDA-COG notified all the organizations that initially participated in the consultation process, during the development of the FFY 2021-FFY 2025 Consolidated Plan and FFY 2024 Action Plan, that comments for the FFY 2024 CAPER were being accepted.

The Borough of Berwick conducted a 15-day public comment period for its FFY 2024 CAPER between November 28 and December 14, 2025. The Borough of Berwick provided a draft copy of the CAPER for public comments at the following locations:

1. Borough of Berwick
1800 North Market Street
Berwick, PA 18603
2. SEDA-COG's Website: www.seda-cog.org

Please refer to the minutes of the public hearing, which provides comment documentation for the public hearing.

The Borough of Berwick does make every effort to make all programs and activities accessible to the learning, mobility, visually, hearing, language-impaired persons, and those with limited English proficiency. Therefore, persons with a disability or limited English proficiency that require an auxiliary aid, service, or accommodation to participate, are invited to contact SEDA-COG to discuss how to best accommodate needs. Translators are also made available at public meetings upon advance request.

Any complaints, grievances, or comments written and submitted to SEDA-COG are addressed within fifteen working days when practicable.

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.

One substantial amendment was approved by Berwick Borough Council for the FFY 2024 Annual Action Plan, resulting in a reallocation of funds for FFY 2017, 2018, and 2021-2023. The reallocation of funds was done, in part, to correct bookkeeping based on how the Borough thought HUD wanted it to be reflected, which the Borough has since learned was not correct. As a result, the reallocation of Code Enforcement fund reflects a repayment in the amount of \$76,502.54. In addition, other funds were reallocated due to surpluses from completed projects being used for approved projects in need of additional funding.

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

N/A

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

N/A

CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	1	0	0	0	0
Total Labor Hours	458.43	0	0	0	0
Total Section 3 Worker Hours	0	0	0	0	0
Total Targeted Section 3 Worker Hours	0	0	0	0	0

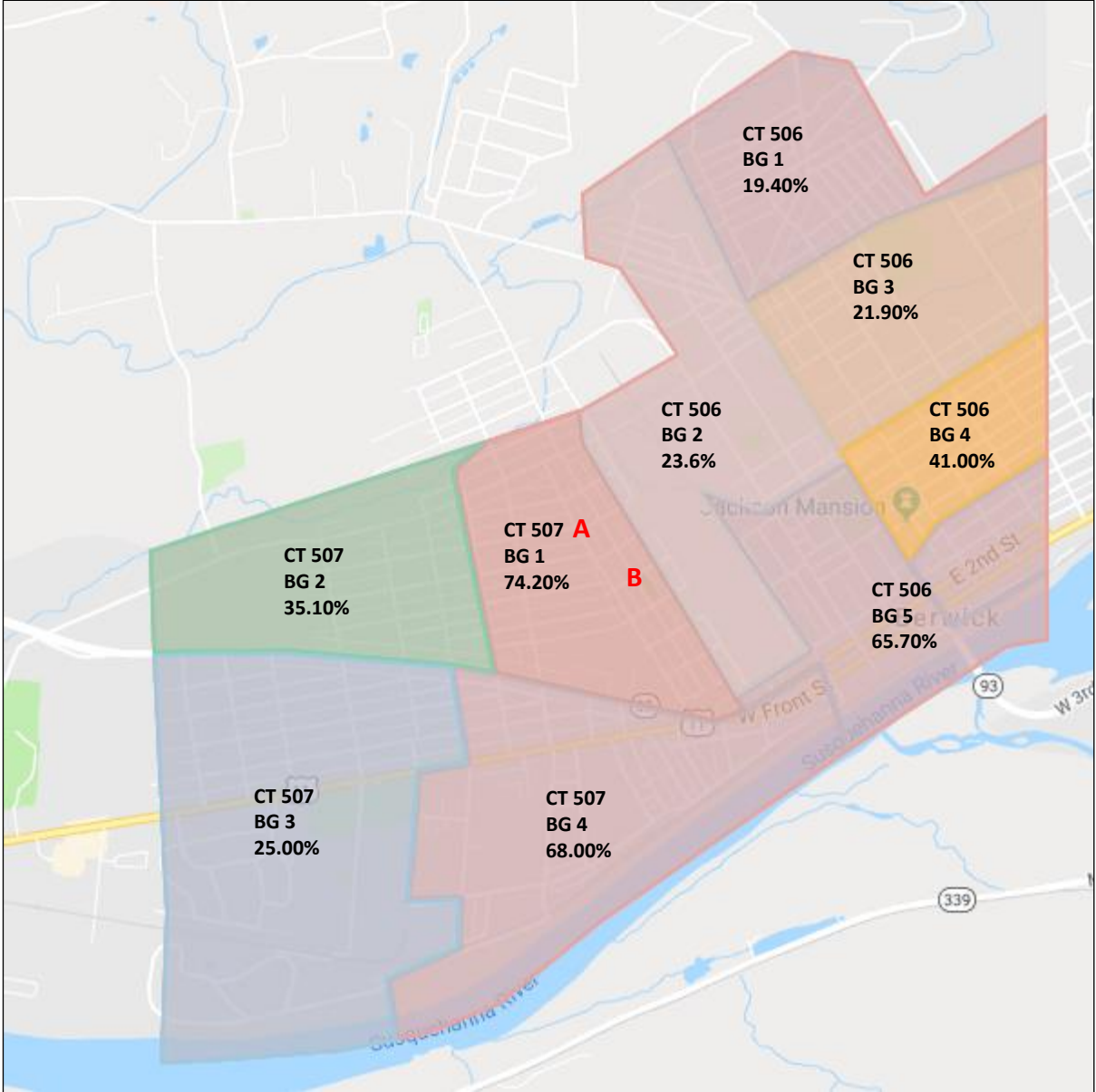
Table 8 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	1	0	0	0	0
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	0	0	0	0	0
Direct, on-the job training (including apprenticeships).	0	0	0	0	0
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	0	0	0	0	0
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).	0	0	0	0	0
Outreach efforts to identify and secure bids from Section 3 business concerns.	0	0	0	0	0
Technical assistance to help Section 3 business concerns understand and bid on contracts.	0	0	0	0	0
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	0	0	0	0	0
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.	0	0	0	0	0
Held one or more job fairs.	0	0	0	0	0
Provided or connected residents with supportive services that can provide direct services or referrals.	0	0	0	0	0
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.	0	0	0	0	0
Assisted residents with finding child care.	0	0	0	0	0
Assisted residents to apply for, or attend community college or a four year educational institution.	0	0	0	0	0
Assisted residents to apply for, or attend vocational/technical training.	0	0	0	0	0
Assisted residents to obtain financial literacy training and/or coaching.	0	0	0	0	0
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.	0	0	0	0	0
Provided or connected residents with training on computer use or online technologies.	0	0	0	0	0
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	0	0	0	0	0
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	0	0	0	0	0
Other.	0	0	0	0	0

Table 9 – Qualitative Efforts - Number of Activities by Program

Narrative

The Washington Street Reconstruction project was the only Section 3 applicable project completed during the 2024 program year. The prime contractor did their due diligence and made targeted outreach attempts to hire Section 3 workers and subcontract to Section 3 firms. These efforts were not successful as the pool of Section 3 subcontractors in the region is very limited and contractors often have the workforce required to complete the project without needing to hire. If there was a need to hire, Section 3 individuals would receive preference.



Berwick Borough
LMI – 45.30%
CAPER
FFY 2024

- Projects:**
- A** – Washington Street Reconstruction
 - B** – Sponsler Park Improvements

Removal of Blighted Structures, Phase IV – Borough Wide
Code Enforcement – Borough Wide

Population by Race	
White	9,417
African American	71
Asian	0
American Indian and Alaska Native	0
Native Hawaiian and Pacific Islander	0
Other	176
Identified by two or more	339
Hispanic (any race)	629
% Minority	5.9%