



U.S. Department of Housing and Urban Development

Philadelphia Regional Office
The Strawbridge's Building
801 Market Street
Philadelphia, Pennsylvania 19107-3380

February 17, 2022

Via email: (ldooley@bloomsburgpa.org)

Ms. Lisa Dooley
Town Manager/Secretary/Treasurer
301 E. Second Street
Bloomsburg PA 17815-1870

Dear Ms. Dooley,

RE: Annual Community Assessment
Town of Bloomsburg
Program Year 2020 (October 1, 2020 through September 30, 2021)

We want to thank you and your staff for all you are doing to serve the CPD program needs of your community during these unprecedented times. The provisions of the Housing and Community Development Act of 1974, as amended, and the National Affordable Housing Act of 1990, require the annual submission of performance reports by grant recipients receiving federal assistance through programs covered under these Acts. Additionally, these Acts require that a determination be made by the Secretary of the U.S. Department of Housing and Urban Development that the grant recipient is in compliance with the statutes and has the continuing capacity to implement and administer the programs for which assistance is received.

The Consolidated Plan regulations at 24 CFR 91.525 require the Department to evaluate and report to the public on a community's overall progress in the management of its program funds, compliance with the Consolidated Plan, the accuracy of performance reports, and the extent to which progress has been achieved toward the statutory goals identified in Section 91.1. This letter serves to apprise you of our assessment of the Town of Bloomsburg's overall progress.

In making our evaluation, we relied primarily upon the Town's submission of the Consolidated Annual Performance and Evaluation Report (CAPER) for Program Year 2020. This report summarized accomplishments made with funds provided from the Community Development Block Grant (CDBG) program. This letter is a summary of our review of the Town's overall performance.

Under the Part 91 Consolidated Planning regulations, all Annual Action Plans and CAPERs are required to include performance measures as part of annual reporting. The Office of Management and Budget has deemed this information necessary to validate the continued funding of HUD programs. The Town provided performance measures as required by this guidance.

CARES Act Program Accomplishments

The Town of Bloomsburg has received an allocation of \$247,240 of CDBG CARES Act funds for use preparing for, preventing, and responding to COVID-19. The Town has expended \$52,392.87 of CDBG-CV CARES Act funds to-date. In Program Year 2020, the funds were spent on the following activities:

- 1) Fire Department Mask Fit Tester; and
- 2) Fire Department In-Cab Filtration Systems.

We appreciate all that the Town has done to serve the needs of its community during these difficult times and to adapt to the many operational challenges that COVID-19 has presented.

Annual Program Accomplishments

The CDBG timeliness requirement is that a community may have no more than 1.5 times its most recent annual grant remaining in the line of credit 60 days prior to the end of its program year. When the 60-day test was conducted on August 2, 2021 it was calculated that your community had an adjusted for program income balance in its line of credit of 1.78 times its annual grant, which is not in compliance with the 1.5 timeliness standard. In accordance with the CDBG-CV Notice (FR-6218-N-01), HUD recognizes the extenuating circumstances under which many local governments were operating due to coronavirus and suspended, effective January 21, 2020, all corrective actions, sanctions, and informal consultations for timeliness for fiscal year 2020. This suspension was extended through September 30, 2021, the end of the 2021 fiscal year. Based on government restrictions, closures, shelter-in-place orders, and social distancing guidance related to coronavirus, HUD has determined that all entitlement grantees have factors beyond their reasonable control that, to HUD's satisfaction, impact the carrying out of CDBG-assisted activities in a timely manner. Therefore, HUD has determined that corrective actions related to timeliness are not appropriate at this time. However, this suspension did not eliminate the timely expenditure requirements set forth in 24 CFR 570.902, and our office noted this lack of timely performance as a deficiency in our January 7, 2021, letter to the Town.

During the 2020 program year, the Town reports that it expended 100.0 percent of its CDBG funds for activities benefiting low- and moderate-income persons, which meets the primary objective of the Housing and Community Development Act of 1974. In addition, the Town spent 0.0 percent of its funds on public service activities, which is below the 15 percent regulatory cap. The Town obligated 20.00 percent of its CDBG funds to planning and

administration, which is exactly the 20 percent regulatory cap and in compliance with the *program year obligation* test at 24 CFR 570.200(g)(2).

The grant-based accounting interim rule at 24 CFR 570.200(g)(1) requires that, for 2015 and subsequent CDBG grants, a grantee may not expend more than 20 percent of any year grant for planning and program administrative costs. As a result, beginning with 2015 CDBG grants, grantees must ensure compliance with this new *origin year grant expenditure* test. In review of the Town's origin year expenditures, HUD has determined that the Town is in compliance with the origin year expenditure test for its 2016 grant—the grant is fully expended and 16.65 percent of the grant was expended for planning and administrative costs. The 2017 grant, also fully expended, and 18.50 percent of the grant was expended for planning and administrative costs. Though not fully expended, currently the Town has expended 19.58 percent of its 2018 grant, 11.98 percent of its 2019 grant, and 9.41 percent of its 2020 grant on planning and program administrative costs. The Town's final compliance with the 2018, 2019 and 2020 origin year expenditure tests will be assessed once the grants are fully expended.

The Town received a CDBG grant of \$274,571 for Program Year 2020 and expended \$301,104 of CDBG funds during this period. Resources were devoted to activities in geographic areas consisting primarily of low- and moderate-income residents throughout the Town. In Program Year 2020, the majority of CDBG funds were spent on public facilities and improvement activities.

HUD acknowledges the Town's programmatic accomplishments during the program year. Based on our review we have concluded that the Town has the capacity to carry out its CPD programs and has met its reporting requirements.

Affirmatively Furthering Fair Housing

The Town of Bloomsburg included in its CAPER its efforts to affirmatively furthering fair housing and identify impediments to fair housing. The Town officially adopted its Analysis of Impediments on July 14, 2020. The Town, SEDA-COG, and Hailstone Economic Consultant have begun a collaboration to address the impediments identified in the study. The following impediments have been identified:

Impediment 1: Fair Housing Education, Advocacy, Monitoring and Enforcement: SEDA-COG, on behalf of the Town of Bloomsburg, annually publishes the Fair Housing Notice in the local newspaper of general circulation. Additionally, a public hearing is annually held during which the public is asked to report any unfair housing practices.

Impediment 2: Benefit Gaps and Challenges: The Town will contact non-profit organizations during the CDBG application preparation process to invite input and support projects that benefit the community.

Impediment 3: Housing Affordability: The Town of Bloomsburg will continue to utilize HOME Weatherization and other grant programs to finance housing rehabilitation.

Impediment 4: Housing Accessibility: The Town will continue using HOME Program funds to assist home accessibility improvements as necessary.

In accordance with the Town's Analysis of Impediments and through collaboration with SEDA-COG, during program year 2020, the "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, and financial assistance. The Town will continue to publicize this information.

U.S. Department of Housing and Urban Development program participants are reminded that the legal obligation to affirmatively further fair housing remains in effect under the Fair Housing Act; Title VI of the Civil Rights Act; Section 109 of the Housing and Community Development Act; and other civil rights related authorities. Please be aware that a jurisdiction could be subject to a compliance review to determine whether, as a recipient of HUD funds, it is in compliance with applicable civil rights laws and their implementing regulations if its certification to affirmatively further fair housing is in question. The Office of Fair Housing and Equal Opportunity (FHEO) initiates most compliance reviews based on risk analyses, issues raised during a limited monitoring review, or when a civil rights problem is detected through HUD program monitoring. FHEO is available to provide technical assistance regarding affirmatively furthering fair housing upon your request. Should you have any questions, we encourage you to reach out to Patricia McGarvey Knebels, Acting FHEO Regional Director, at (215) 430-6664, or by email at PatriciaMcGarvey.Knebels@hud.gov.

We ask that you review our assessment of your performance and provide any comments that you may have within 35 days of the date of this letter. Upon receipt, we will evaluate your comments and make any revisions that are deemed appropriate. If you do not have any comments, we request that you formally notify us of that fact within the 35-day timeframe. Where no comments are received within the designated timeframe, our initial letter will serve as our final assessment of the Town's performance for this program year. To facilitate and expedite citizen access to our performance letter, we request that you inform the general public and interested citizens' organizations and non-profit entities of its availability. If, for any reason, the Town chooses not to do so, please be advised that our office is obligated to make the letter available to the public. We appreciate your cooperation in this matter.

We look forward to continuing to work with you and members of your staff to accomplish Departmental goals and mutual objectives to develop viable urban communities. We would also be pleased to provide you with any information on resources that may be available to your community. If you need assistance, or if you have any questions concerning the content of this letter please contact Kathleen McCarthy, Community Planning and Development

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Representative at (610) 836-2570 (cell), or by email, at kathleen.k.mccarthy@hud.gov. Our telephone text (TTY) number for the hearing impaired is (800) 877-8339.

Sincerely,

NADAB BYNUM

Digitally signed by: NADAB BYNUM
DN: CN = NADAB BYNUM C = US O = U.S.
Government OU = Department of Housing and
Urban Development, Office of Administration
Date: 2022.02.17 09:45:32 -0500

Nadab O. Bynum
Director
Office of Community Planning
and Development