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July 23, 2010

Daniel J. Siegel, Commissioner  
Board of Commissioners  
1705 Marilyn Drive  
Havertown, PA 19083

Dear Commissioner Siegel:

Enclosed is short version of the report submitted each year to the Federal government describing how you spent the funds given to you. I have not attached the many computer reports, although they are available in Mr. Gentile's office and at the Library for review. It is entitled "Fifth Program Year CAPER" (Consolidated Annual Performance Evaluation Report). It means it is the 5<sup>th</sup> year of a 5-year cycle and actually the 35<sup>th</sup> funding year.

The FY ended March 31, 2010 and Haverford expended \$931,745 of the \$996,731 received (94%). In addition, Haverford received \$264,617 of HUD Stimulus funds on August 28<sup>th</sup> and expended \$218,180 (83%). The balance of \$46,437 is fully obligated and will be paid at your August Board Meeting. You also received \$190,000 of DOE Stimulus money on October 1<sup>st</sup> for street lights. A contract for \$160,000 has been awarded and should be done by the end of October. Not only will the new lighting be better, they will save you thousands of dollars in the years ahead in PECO energy charges. You should also be entitled to a PECO rebate on the \$160,000.

Sincerely,

Anthony J. Dunleavy

AJD/jml  
Enclosure

Cc: Mr. Lawrence J. Gentile, Township Manager/Secretary



# Fifth Program Year CAPER

The CPMP Fifth Consolidated Annual Performance and Evaluation Report includes Narrative Responses to CAPER questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

The grantee must submit an updated Financial Summary Report (PR26).

## GENERAL

### Executive Summary

#### 1. INTRODUCTION

The report covers the Community Development Block Grant Program for the period April 1, 2009, through March 31, 2010. Tangentially, Haverford will discuss its major housing program, HOME, funded by the Commonwealth of Pennsylvania, with the local match (no longer required) being provided by the Delaware County Affordable Housing Trust Fund.

Haverford, beginning in 2005, used HUD's new CPMP Tool. This is the final year of the five-year CPMP cycle. All activities prior to 2004 were previously reported complete.

It also reports on the ARRA (Stimulus) assistance from HUD, called CDBG-R. Under CDBG-R, Haverford received \$264,617 on August 27, 2009. To date, it has expended directly from CDBG-R \$218,179.60, which is 82.5% of the grant amount. In addition, Haverford has provided an additional \$200,000 for these same activities. The intent was to create jobs and improve infrastructure. Both are being accomplished in a timely manner. Completion is expected during the summer of 2010, less than one (1) year from approval.

Attached is an IDIS Report called "CDBG Financial Summary." Basically, it shows:

Amount of Federal Funds from prior grant, unspent on 3/31/09	\$ 7,426.82
FY 09 Grant 4/1/09	\$ 996,731.00
Program Income received	\$ <u>218,378.99</u>
Total Available	\$ 1,222,536.81
Total Expended	\$ <u>931,744.96</u>
<b>Total Available on 4/1/10</b>	<b>\$ 290,791.85</b>

Benefit: At least 70% of funds must benefit Low/Moderate Persons:

1) Amount benefiting Low/Moderate	\$ 622,321.19
2) Total subject to calculation	\$ 674,044.89
3) Percent of Low/Moderate Benefit	92.33%

Administration Cap: Only 20% of funds received may be used for Administration and Planning.

1) Funds Basis	\$1,215,109.99
2) Used for Administration	\$ 257,700.27
3) Percent of Administration	21.21%

The IDIS computation on the PR 26 form that follows (which is the basis for the computer generated figures) is **INCORRECT**.

If one examines the PR 36 form which shows the receipt of Program Income by actual dates, the listing for 2009 shows \$207,489.65. However, there is an entry which occurred on 6-03-09 in the amount of \$11,611.93, thus bringing the total to \$219,101.58. This is a difference of \$722.59 between the two reports.

While insignificant (.003), it reduces the percentage to 21.18.

More importantly, while the PR 26 shows on line 15 that **total expenditures** are \$931,744.96, the PR 05 shows total expenditures are \$1,140,722.10 because it includes the CDBG-R grant of \$264,617 (of which \$218,179.60 was expended). Thus, the Admin. computation correctly should be:

Funds Basis:	\$1,480,499.58
Used for Administration.	\$ 257,700.27
Percent of Administration	17.38%

In fact, \$26,460 of the total Admin. amount was used for Admin. in CDBG-R and so recorded. Therefore, the exact amount using the PR 26 formula would be:

Funds Basis:	\$1,215,109.99
Used for Administration	231,240.27
Percent of Administration	19%

Note: The amount spent in the CDBG-R program is slightly under 10% of the grant basis.

Conclusion: Haverford did not exceed the 20% Admin. cap in the CDBG or CDBG-R programs.

Public Services:

1) Funds Basis	\$1,257,369.69
2) Used for Public Services	\$ 15,000.00
3) Percent of Public Service	1.19%
Unreconciled Differences	\$ 0.00

**2. SUMMARY OF EXPENDITURES**

- A. There are a series of IDIS Reports which follow. IDIS is HUD's disbursement and information management system. It carefully tracks activities and expenses.

The first report is called CDBG Financial Summary for Program Year 2009. In addition to being a summary, it lists all low/moderate income expenditures.

The second report shows a List of Activities for 2009. It includes the 2 CDBG-R Activities (Activities 11 and 12).

The third report shows Consolidated Plan Projects for 2009. It includes not only activities solely funded in 2009, but also all activities in which expenditures occurred. We have not included data prior to 2004 since it was all complete prior to FY 09.

The fourth report shows CDBG Housing Activities (since 1994). It does not reflect the current year total of 10 units which are reflected on page 8 following herein.

The fifth report shows HUD grants since 1989 and Program Income since 1996.

The sixth and seventh reports are a detail of program income and receipt audit trail.

The eighth report is the Grantee Summary Activity Report which shows ALL activities since 1994.

The ninth and tenth reports show all Drawdowns between April, 2009 and March 31, 2010, by Project and Activity AND by voucher.

The eleventh and twelfth reports show counts of CDBG activities by group and matrix code as well as accomplishments for **completed** activities in FY 09.

As to Timeliness, Haverford is well within HUD's standard for prompt and timely expenditures of funds. As of March 31, 2010, Haverford had in its LOC \$290,791.85 for CDBG plus \$46,437.40 for CDBG-R, which is less than 31% of the (new) FY 10 grant.

- B. There are several forms which follow which are a part of HUD's CPMP tool. They are the CAPER portion of the CPMP tool PROJECTS which were in the 2005 Consolidated Plan/Action Plan. This completes this Consolidated Plan cycle.

## General Questions

### 1. Assessment of the one-year goals and objectives:

- a.
  - (1) All activities prior to 31<sup>st</sup> year have been completed for several years.
- b. For the 31<sup>st</sup> year, the following status is reported:
  - (1) Grange. Work at Grange has been fully completed since the last CAPER including punchlist item.
- c. All 32<sup>nd</sup> year activities were previously reported as complete.
- d. All 33<sup>rd</sup> year activities were previously reported as complete.
- e. All 34<sup>th</sup> year activities were previously reported as complete.
- f. In the 35<sup>th</sup> year, the following status is reported:
  - (1) Street improvements are complete.
  - (2) Wynnefield Drive. The activity which involved design of Channel Restoration and Alley Reconstruction has been completed and bids are ready for advertisement. As a result of this work, Haverford received a grant under the State's H<sub>2</sub>O Program for \$1,000,000 for construction. CD funds in Year 36 will only be used for construction and supervision of the alley.  
  
This activity (Year 35) still has costs remaining, related to obtaining easements/legal matters for elements needed prior to construction.
  - (3) Housing Rehabilitation. 10 units of CDBG funded rehab are completed (1 unit of HOME funded was completed). 6 of the 10 are female-headed; 4 of the 10 are elderly; none are handicapped; all 10 are white, non-Hispanic. Income status is shown on the chart in the Housing section below. All 10 are L/M fundable. The one HOME unit is female-headed, elderly and L/M.
  - (4) CAADC Public Services at the Life Center are complete. 5 persons claiming Haverford residency received assistance. All were white, non-Hispanic.
  - (5) DAP Public Services at various undisclosed locations are complete. 23 persons from Haverford received assistance. Of this number, 20 were white, non-Hispanic and 3 were Black.

The goals were listed on pages 92 to 97 of the Consolidated Plan as updated by the 2008 Action Plan. In Year 4, we proposed:

**Goal 1: Provide Decent and Affordable Housing for Lower-Income Households**

- Priority 1.1:** Rehab 8 housing units and assist 8 L/M households.  
Achieved: 10 houses completed in the 35<sup>th</sup> year, and 1 was completed in the prior HOME program. 137% of Goal met.
- Priority 1.2:** Reduce number of fair housing complaints/violations.  
Achieved: Goal met. There were no violations.

**Goal 2: Provide Neighborhood and Economic Development**

- Priority 2.1:** Target resources to achieve neighborhood stability.  
Achieved: Achieved all of the outcome indicators, such as increasing affordability for lower-incomed persons, achieving 75% of specific goals for activities, increased number of jobs created/retained, etc.
- Priority 2.2:** N/A
- Priority 2.3:** Complete 75% of tasks.  
Achieved: Achieved over 75%.

**Goal 3: Provide Housing and Services for Homeless Population**

- Priority 3.1:** N/A
- Priority 3.2:** Assist 28 persons by providing essential services.  
Achieved: Directly assisted 28 persons from Haverford, including domestic abuse victims.
- Priority 3.3:** Assist 28 persons requiring emergency housing.  
Achieved: Directly assisted 28 persons from Haverford at the homeless shelter and scattered locations and contributed to the overall operation of the homeless shelter which assisted 45 others.

**Goal 4: N/A**

**Conclusion:** Haverford achieved most of its specific goals. Those not fully achieved were within easy reach of 100%

- g. The CDBG grant funds spent on each grant activity is listed on several IDIS reports:
    - Summary of Projects
    - Drawdown Reports (2)
    - List of Activities
    - Summary of Accomplishments
  - h. Commonwealth of Pennsylvania Expenditures
    - On February 16, 2010, the Pennsylvania Department of Community and Economic Development awarded Haverford a new \$500,000 contract under the HOME Program. No units have been completed; four are underway.
  - i. Delaware County
    - The County's Affordable Housing Trust Fund provided \$41,560 in the reporting period. These funds were used to complete homes reported above in CDBG.
  - j. Lack of Progress: Not applicable. We believe substantial progress has been made.
2. Haverford would not change its Program.
3. a. There are NO impediments to Housing Choice as our AI indicates.
- b. Although there are no specific identified impediments, Haverford has taken a number of actions to assist persons seeking housing to avoid any potential impediments. It has continued to operate its Fair Housing hotline and has responded to every issue/question/complaint, irrespective of its relationship to Fair Housing or location. It has taken positive steps to make housing more accessible to all persons both through the housing rehab program and the private/public loan program. It has responded to over 50 inquiries of various housing related issues in this program year.
4. Leveraging
- a. It is axiomatic that Federal resources leverage other public and private resources, just by their existence. In particular, assistance to the 2 non-profits leverage our funds by a factor of 100. Wynnefield Drive funding leverages CDBG funds by over 3 to 1. CDBG-R has leveraged HUD funds by 100%.
  - b. There is no matching requirement.

## Managing the Process

1. Every activity was carefully evaluated to ensure compliance with all requirements before initiation during and after execution. The Township specifically tasked this responsibility to persons they deemed qualified and monitored the progress.

## **Citizen Participation**

1. There were no citizen comments on the program although there were comments from residents of Wynnefield Drive. These are in the process of being addressed.
2. All federal funds were used to further the objectives of the Consolidated Plan are listed in both the IDIS reports and the CPMP tool materials. They list funds committed, expended and geographic distribution by Census Tract. Program income as well as total available are listed.

## **Institutional Structure**

1. No gaps were identified.

## **Monitoring**

1. Haverford has only two (2) subrecipients. Both were monitored once during the program year. A desk audit was done based on two field audits by others and review of the financial audit. In terms of all other activities, they are monitored by the Township Manager daily and the Board, at least monthly.
2. Activities are being carried out properly. No improvements are proposed.
3. Self Evaluation
  - a. Haverford cannot point to a specific solution achieved in the homeless or abused spouse programs since the population is invisible. As to the provision of housing and other actions, we reported elsewhere (see General) how they addressed problems and tangible results achieved.
  - b. 100% progress was made to meet identified needs.
  - c. The units provided are decent, and are in a suitable living environment. Supportive sources expanded potential economic opportunity.
  - d. No activity is falling behind schedule in the past Action Year.
  - e. The activities carried out have a definite measurable impact on the neighborhoods, visually and economically.
  - f. The indicators that best describe the results are listed above in the Assessment (General).
  - g. There were no barriers having a negative impact
  - h. All major goals to date have been met.
  - i. We have not identified any adjustments/improvements needed.

**Lead-based Paint**

1. Every single house is completely tested for lead. If found, it is 100% abated. Clearance testing is performed.

**HOUSING**

**Housing Needs**

1. Our actions to foster and maintain affordable housing are fully set forth above, particularly see page 4, items 1. b)(1) and c)(3)(4) and (5).

**Specific Housing Objectives**

1. The specific objective with respect to affordable housing is Goal 1 on page 5 above (see priority 1.1) and Goal 3 (see priority 3.2 and 3.3 here and table under C.).
2. Haverford has no Section 215 housing.
3. Haverford addresses “worst-case” housing needs and housing needs of persons with disabilities, as it becomes aware of such needs and to the degree it has or can provide a program that responds to such a need. For example, every rehab addressed the issue of persons with disabilities as does the assistance to the homeless/abused persons.

The following table reflects the numbers of extremely low, low and moderate income owner households completed in the past twelve months.

<u>CATEGORY</u>	<u>NUMBER</u>		<u>%</u>
	<u>CDBG</u>	<u>HOME</u>	
Extremely Low Income	2	1	27.0%
Low Income	1	0	9.0%
Moderate Income	7	0	64.0%
<b>TOTAL</b>	<b>10</b>	<b>1</b>	<b>100.0%</b>

This level of expenditure, particularly for low income housing exceeds our goals, mainly because we were able to obtain funds from the State and County solely for owner-occupied housing rehabilitation.

- 5 of the 11 households were elderly.
- 7 of the 11 households were female-headed.
- None of the 11 households were handicapped.
- 11 were white, non-Hispanic.

We have NOT addressed renter households at all. Neither HUD nor DCED provided any funding for renters. Only 8 renters are being assisted under Section 8 as of March 31, 2010. There is no public housing. Haverford is not eligible to receive HOME or ADDi funding.

### **Public Housing Strategy**

1. Not applicable since there is NO public housing in Haverford.

### **Barriers to Affordable Housing**

1. Haverford's actions are listed above under Specific Housing Objectives, item 1. and also in our response to Affirmatively Furthering Fair Housing. Haverford is unaware of any barrier to housing in the Township.

### **HOME/ American Dream Down Payment Initiative (ADDI)**

1. Haverford does not receive funding from either of these sources. However, there is a demonstrated need for such programs which HUD does not meet.

## HOMELESS

### **Homeless Needs**

1. Haverford funded assistance to homeless persons although it does not receive ESG or other Federal targeted assistance.
2. Haverford's homeless population is generally "invisible," i.e., there are no indicators of such need visible. Yet, 5 residents went to the Homeless Shelter partially supported by Haverford. Likewise, 23 abused spousal family members (in 23 households) received assistance. 16 were below 50% of median. They also are not generally visible. 3 of the 23 were Black.
3. Haverford is not eligible for the Homeless SuperNOFA.

### **Specific Homeless Prevention Elements**

1. Haverford has taken no actions to prevent homelessness other than the housing rehab grant assistance. It has also funded 2 public service activities to address problems of homelessness.

## Emergency Shelter Grants (ESG)

1. Haverford Township receives no ESG assistance.

## COMMUNITY DEVELOPMENT

### Community Development

1. Haverford's assessment of CDBG Funds to Goals is on pages 3, 4, 5 and 6 under General Questions item 1, Assessment.
2. There have been no changes in Objectives nor do we believe change is necessary based on our experience to date.
3.
  - a. Haverford pursued every resource it said it would in the Consolidated Plan.
  - b. There has been no unfairness or impartiality in any program matter, in our opinion.
  - c. We are asked to show how we have NOT hindered the Consolidated Plan by action or willful inaction. We state we are unaware of any hindering of implementation of the Consolidated Plan.
4.
  - a. Haverford did NOT use funds that did not meet a National Objective.
  - b. All funds were included in the benefit computation.
5.
  - a. No activities triggered displacement or relocation.
6. There were no low/mod Job Activities programmed, although, all construction projects created jobs.
7. Haverford did not undertake an activity which did not fall within the category of presumed L/M benefit.
8.
  - a. Program income is detailed in the two IDIS reports on Program Income.
  - b. There is no float funded activity.
  - c. There are no loan repayments.
  - d. No property has been sold.
9. There has been no prior period adjustments.
10. There have been no loans or other receivables.

11. There have been no lump-sum agreements.
12. As to Housing Rehab, this is fully reported above under Assessments.
13. There is no NRSA.
14. HUD approved Haverford's CDBG-R request on August 27, 2009, in the amount of \$264,617. Haverford provided an additional \$200,000 of its funds to undertake these two activities. As of the March 31, 2010, program year end date for the Entitlement CDBG Program, \$218,179.60 (83%) had been expended. The balance of total costs will be expended by June 30, 2010, when weather permits resumption of activities.

### **Antipoverty Strategy**

Haverford has no job creation activity. Its focus related to anti-poverty has been through the housing rehab program. That program, while minimal in persons affected each year, does allow persons of limited income to direct their funds to items other than housing repair. Incidentally, over 400 families have been assisted in the last 19 years.

## NON-HOMELESS SPECIAL NEEDS

### **Non-homeless Special Needs**

This function is carried out at the County level.

### **Specific HOPWA Objectives**

Haverford does not receive HOPWA funding.

## OTHER NARRATIVE

Section 3 Form 60002 was submitted to FHEO on October 14, 2009, for the prior Federal fiscal year.