



U.S. Department of Housing and Urban Development

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MAY 31 2011

YORK COUNTY
PLANNING COMMISSION

Philadelphia Office
The Wanamaker Building
100 Penn Square East
Philadelphia, Pennsylvania 19107-3380

MAY 25 2011

The Honorable Steve Chronister
President
York County Board of Commissioners
County Administrative Building
28 E. Market Street, 2nd Floor
York, PA 17401-9550

Dear Mr. Chronister:

SUBJECT: Annual Community Assessment
York County, Pennsylvania
January 1, 2010 to December 31, 2010

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 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 this 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 York County's overall progress.

In making our evaluation, we relied primarily upon the County's submission of the Consolidated Annual Performance and Evaluation Report (CAPER) for Fiscal Year 2010. This report summarized accomplishments made with funds provided from the Community Development Block Grant (CDBG), Home Investment Partnerships (HOME), American Dream Down payment (ADDI), and Emergency Shelter Grant (ESG) Programs. In addition, we took into account technical assistance; follow up conversations with York County's staff and the handling of citizen comments and complaints. This letter is a summary of our review of York County's overall performance.

As you know, under the update to the Part 91 Consolidated Planning regulations that came into effect March 13, 2006, all Annual Action Plans and Consolidated Annual Performance and Evaluation Reports (CAPERs) are required to include Performance Measures as part of their annual reporting. The Office of Management and Budget (OMB) has deemed this information necessary to validate the continued funding of HUD programs. York County provided Performance Measures as required by the new guidance.

The HUD 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 timeliness test was conducted on November 2, 2010, it was calculated that the County had a balance in its Line of Credit of 1.43 times its annual grant and is apparently in compliance with the 1.5 timeliness standard.

During the 2010 Program Year, York County expended 95.76 percent of its CDBG funds for activities benefiting low or moderate income persons. During the three year certification period, Fiscal Years 2008, 2009 and 2010, the County expended 95.75 percent of its CDBG funds cumulatively for such activities, which meets the Primary Objective of the Housing and Community Development Act of 1974. In addition, York County obligated 7.84 percent of funds on public service activities which meets the 15 percent regulatory cap. The County obligated 19.87 percent of its funds on planning and administration, less than the 20 percent regulatory cap.

The County has met the HOME requirements for expenditures by committing all funds to projects within two years and expending funds within five years. The requirement to provide at least 15 percent of HOME funding to Community Housing Development Organizations has also been achieved. We do remind the County that all HOME projects should be closed within 120 days of their final draw.

The County included information in its CAPER about the actions to affirmatively further Fair Housing and identified impediments to Fair Housing. Some of the actions undertaken by the County this year to overcome the effects of impediments to fair housing choices include:

- Continued to support the Community Progress Council (CPC), which administers the rental assistance program for the County and provides tenant/landlord counseling. The program provided rental assistance and tenant/landlord counseling to 1,184 persons during 2010.
- Continued to support a variety of public service agencies with an array of housing and supportive services. During 2010, the County provided funding to eight different agencies to serve the entire County.

- Provided assistance to the Housing Initiative Program, which provides assistance to local community development corporations for developing affordable housing for low/moderate income residents in the County;
- Continued to support the Affordable Housing Trust Fund in 2010, which enables many low/moderate income households to purchase a home in the County, and
- The York County Planning Commission continued to provide comments related to affordable and fair housing in its review of municipal zoning ordinances and subdivision and land development ordinances, as well as amendments.

While we recognize the above fair housing efforts, in a letter dated April 19, 2011, our FHEO office communicated a few concerns and recommendations related to Fair Housing, please review them and take necessary steps to effectively further fair housing in the County.

The County received a total of \$702,477 in CDBG-R funding and \$1,074,741 in Homeless Prevention and Rapid Re-Housing Program (HPRP) funding under the American Recovery and Reinvestment Act of 2009 (ARRA). The County also received \$2,017,253 in Neighborhood Stabilization Program (NSP) grant funds authorized by Title III of the Housing and Economic Recovery Act of 2008 (HERA). As of April 29, 2011, the County has obligated all these funds, and expended 86.55% of its NSP funding, 60.84% of CDBG-R funding, and 32.41% of its HPRP funding. The County is slightly behind with HPRP expenditures. Please note that our Office continues to stand ready to provide any assistance you may need to help the County to carry out the programs funded through ARRA/HERA.

We congratulate York County on its accomplishments during this program year. Based on our review we have concluded that York County has the capacity to carry out its programs and has met its reporting requirements.

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 County'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, York County 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 Mr. Nadab O. Bynum, Director, Office of Community Planning and Development, at (215) 861-7652. This Office may be reached by text telephone (TTY), at (215) 656-3452.

Sincerely,

Brenda Laroche

FOR Jane C. W. Vincent
Regional Administrator

cc:

✓ Mr. M. Chris Rafferty