



U.S. Department of Housing and Urban Development

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

JUN 16 2017

The Honorable Gabriel J. Campana
Mayor
City of Williamsport
245 W 4th Street
Williamsport, PA 17701

Dear Mr. Campana:

RE: Annual Community Assessment
City of Williamsport
January 1, 2016 through December 31, 2016

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 (HUD) 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 City of Williamsport's overall progress.

In making our evaluation, we relied primarily upon the city's submission of the Consolidated Annual Performance and Evaluation Report (CAPER) for Fiscal Year 2016. This report summarized accomplishments made with funds provided from the Community Development Block Grant (CDBG) and Home Investment Partnerships (HOME) programs. This letter is a summary of our review of the City of Williamsport's overall performance.

Under the update to the Part 91 Consolidated Planning regulations, effective March 13, 2006, all Annual Action Plans and CAPERs are required to include performance measures as part of their annual reporting. The Office of Management and Budget has deemed this information necessary to validate the continued funding of HUD programs. The city provided performance measures as required by this guidance.

The HUD timeliness requirement is that a community may have no more than 1.5 times their most recent annual grant remaining in the line of credit 60 days prior to the end of their program year. When the 60-day timeliness test was conducted on November 2, 2016, it was calculated that Williamsport had a balance in its line of credit of 1.45 times its annual grant, which is in compliance with the 1.5 timeliness standard. Please note that this did not include any program income that the city may have in its accounts. Thus, this figure may actually be higher.

During the 2016 program year, the city expended 97.74 percent of its CDBG funds for activities benefiting low/moderate -income persons, which meets the primary objective of the Housing and Community Development Act of 1974. In addition, the city obligated 0.74 percent of funds to public service activities, which is below the 15 percent regulatory cap. The City of Williamsport also obligated 17.42 percent of its funds to planning and administration, which is within the regulatory cap.

Williamsport received a CDBG grant of \$944,106 for Program Year 2016 and a HOME allocation of \$192,660. The city expended a total \$ 860,042 in CDBG funds and a total of \$ 259,034 in HOME funds in 2016. All funds were used to address the highest priority activities that the city identified in its 2015 - 2019 Consolidated Plan.

The city met its HOME requirements for commitment and expenditure deadlines. Additionally, Williamsport ensures that recipients of HOME and CDBG funds for rental activities abide by the Fair Housing Act of 1973, Americans with Disabilities Act, Civil Rights Acts, and Age Discrimination Act. Assisted unit rents must be affordable to low-mod income households. Developers of multi-unit HOME assisted activities are required to prepare and follow a Fair Housing and Marketing Plan. Participants in the City Homebuyer Assistance program must attend an educational pre-purchase homebuyer training session that will help them retain their housing. In 2016, the city did not receive any inquiries or complaints regarding fair housing.

The city included in its CAPER their role in affirmatively furthering fair housing and identifying impediments to fair housing. The city is currently working through the Affirmatively Furthering Fair Housing (AFFH) Assessment Tool to identify fair housing issues and to develop goals to address them. In 2014, a review of the city's current Fair Housing Analysis of Impediments was conducted. This analysis will be useful as the city prepares its assessment using the AFFH tool.

Williamsport also ensures the dissemination of fair housing information. Every four years each rental unit within the City of Williamsport limits is inspected for basic health, safety and occupancy standards. At that time, Code and Rehabilitation Inspectors distribute fair housing anti-discrimination information. Fair housing information is also on display in the Codes Department, the Community Development Office, and public areas in City Hall. The city also distributed fair housing posters and flyers to a variety of organizations.

The Office of Fair Housing and Equal Opportunity (FHEO) reviewed the city's 2016 CAPER submission and made the following recommendations for improving the civil-rights-related aspects of the city's programs:

1. FHEO recommends that the city carry out a four-part analysis in accordance with the process set forth in HUD's final rule on Limited English Proficiency. Should the report indicate a need for language support, the city should adopt a written Language Access Plan.
2. FHEO recommends that the city analyze and explain the reasons for the racially-skewed beneficiary distribution under its CDBG program. The numbers are inconsistent and bear explaining.
3. FHEO recommends that the city give more specific information on the location of its investments. The maps it included were helpful, but HUD guidance states that in the relevant narrative portion of the CAPER, the city should provide a general description of the location of the investments. FHEO recommends the census tract as the location reference for each investment.
4. FHEO recommends that the city adopt a written affirmative marketing policy that meets the five criteria set forth in the relevant HUD regulation.
5. FHEO recommends that in the future, when it has not in fact contracted with any MBEs or WBEs during the reporting period, the city provide evidence of a good-faith effort to attract MBEs and WBEs to bid on contracts funded with HUD grant money.

Please note that the Office of Fair Housing and Equal Opportunity (FHEO) is available to provide technical assistance regarding affirmatively furthering fair housing upon your request. Should you require technical assistance or have questions regarding the FHEO review comments and recommendations, please contact Michael Jansen, FHEO Director – Pittsburgh Office, at (412) 644-5449 or via email at michael.jansen@HUD.gov.

HUD congratulates the City of Williamsport on its accomplishments during the program year. In accordance with 24 CFR 91.525, the Department has concluded that the City of Williamsport has the capacity to carry out its programs and has met its reporting requirements.

The Department requests 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 city's performance for this program year.

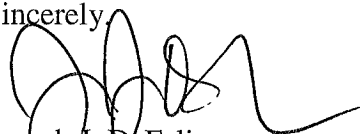
To facilitate and expedite citizen access to our performance letter, we request that you inform the public and interested citizens' organizations and non-profit entities of its availability.

If, for any reason, the city 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.

The Department looks forward to continuing to work with you and members of your staff to accomplish departmental goals and mutual objectives to develop viable urban communities. Our office 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, Community Planning and Development Director, at (215) 861-7652, or Ms. Andrea Edwards, Economic Development Specialist, at (215) 861-7658, or by email, at andrea.edwards@hud.gov. This office may be reached via text telephone (TTY), by dialing (800) 877-8339.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. DeFelice', with a long horizontal flourish extending to the right.

Joseph J. DeFelice
Regional Administrator

cc:

Mr. John Grado

Ms. Stephanie Young