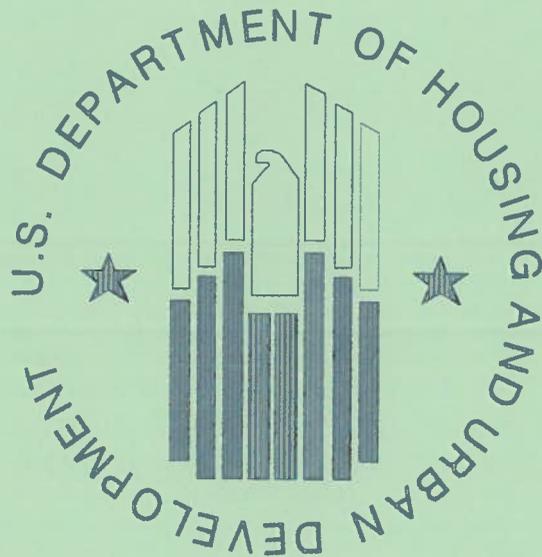


**U.S Department of Housing & Urban Development
Buffalo, New York Office**



Annual Community Assessment Report

for

City of Elmira, New York

**Covering the Program Year of
July 1, 2014 – June 30, 2015**

8. Improve the quality of life for senior citizens.
9. Historic preservation.

The actual 2014 Program Year expenditures recorded in IDIS reflect that the City did expend HUD funds in these broad categories and within the requirements of HUD funding regulations.

Performance Reports / CAPER Completeness

A Consolidated Annual Performance and Evaluation Report (CAPER) is due 90 days after the City completes its program year, which would be September 29th. The City's 2014 CAPER was received on September 24, 2015. The report was determined to be substantially complete, including providing an adequate description of the City's progress and performance throughout the program year.

More detailed information and an assessment of accomplishments can be found in Section III of this report. Comments/Notes and any requests for supplemental information will also be noted below.

Section II - General Overview and Cross Cutting Areas

FHEO - HUD's FHEO Division evaluated the City's 2014 CAPER and determined that the City's performance was adequate under Title VIII and E.O. 11063 Certifications. They recommended that, if the City has not already conducted a demographic study to determine the extent of non-English-speaking population in its jurisdiction, it do so. If the study indicates that the Limited English Proficient (LEP) population exceeds 1,000 people or 5% of its total population, the City must conduct a four factor analysis and develop a Language Assistance Plan (LAP). For additional information on these issues, please contact Tammy Muffoletto, Equal Opportunity Specialist at 716-551-5755, extension 5524 or at Tammy.M.Muffoletto@hud.gov.

Citizen Participation - The grantee has conducted the required hearings and public notification to comply with citizen participation requirements. No comments were received during the reporting period.

Compliance Monitoring - No HUD programs were monitored during the most recent two program years. The most recent HUD monitoring is described below:

Program Reviewed: CDBG and HOME
Date of Monitoring: July 24, 2012 - July 27, 2012
Monitoring Status: No findings and one concern

Subrecipient Oversight & Monitoring - In PY2014 the City of Elmira funded public service activities administered by the following subrecipients: Catholic Charities of Chemung/Schuyler (foreclosure prevention counseling and Second Place East Emergency Shelter), Court Appointed Special Advocates (CASA), Ernie Davis Community Center and Southside Community Center. The City monitors its subrecipients, including an evaluation of performance.

Management – The City has staff and consultants that are capable of administering and overseeing the HUD-funded programs.

Financial – The financial information reported by the City appears to be complete, accurate, and sufficiently detailed to document the overall condition of HUD programs. Our review did not disclose any issues related to financial compliance.

Audits - A Single Audit must be submitted each year 9 months from the end of the City’s fiscal year. Both the Federal Audit Clearinghouse (FAC) and HUD have received and reviewed Elmira’s PE 12/31/2014 Single Audit.

Quarterly Federal Financial Reports (SF-425) - Reports have been received for the assessment period and are current.

Section III – Specific Program Progress and Performance

Community Development Block Grant (CDBG)

National Objective Compliance: The CDBG program was designed to principally benefit low- and moderate-income persons. According to the City’s PR26, during Program Year 2014 the City spent 100 percent of its non-administrative funds on activities that principally benefitted low- and moderate-income persons. Activities reported appear to meet a national objective.

PY 2014 Summary of Use of CDBG funds:

	Activities Completed	2014 \$ Disbursed	% of total Disbursed
Economic Development	1 activity	\$ 0	0%
Housing	40 activities	\$ 182,655.36	21.47%
Public Facilities & Improvements	11 activities	\$ 235,811.75	27.72%
Public Services	10 activities	\$ 101,000.00	11.87%
Section 108 Repayment	2 activities	\$ 331,207.50	38.93%
TOTAL	64 activities	\$ 850,674.61	99.99%

Activities: Program activities were adequately described during the reporting period. CDBG funds were spent on activities that were eligible under program rules. The above “Activities Completed” chart reflects multiple program year funding, does not reflect work in progress or activities underway at the time of the CAPER report and does not include planning and administration disbursements.

The City of Elmira has reported on the fifth year of a five-year strategic plan. The CAPER and IDIS indicate that the City has made good progress in meeting the stated numeric goals for specific activities.

Financial:

Planning and Administration: During Program Year (PY) 2014, the City expended 18.78 percent of its overall spending on planning and administration. This is within the 20 percent limit.

Program Income: The City received \$212,290.32 in CDBG program income in PY 2014.

Expenditure Timeliness: The CDBG program requires that the City's unexpended CDBG funds be no more than 1.5 times its annual grant 60 days before the end of the program year. The City was in compliance with the 1.5 timeliness test made on May 1, 2015. As of November 17, 2015, the balance of CDBG funds on Elmira's line of credit was \$1,394,267.85, which is 1.31 times the 2015 CDBG grant award of \$1,067,918. Based on historical performance we do not anticipate that the City will have any problem meeting its May 1, 2016 timeliness test.

IDIS Data: The City has aggressively addressed its older, open CDBG activities and should continue to monitor its IDIS records regarding the status of activities at least quarterly.

Public Services: During Program Year (PY) 2014, the City expended 6.83 percent of its overall spending on public services. This is within the 15 percent limit.

Other Issues / Recommendations / Highlights

Highlights noted during the CAPER reviews include:

- Rehabilitated 40 single-family units
- Provided homeownership counseling to 418 households
- Served 840 persons at Catholic Charities' Second Place East Emergency Shelter

Home Investment Partnerships Program (HOME) Grant

Beneficiary Compliance: Beneficiaries were compliant with HOME low-mod income requirements.

Activities: Program activities were described for the reporting period. HOME funds were spent on activities that were eligible under program rules. The funded programs and accomplishments reported are on track, compared to the stated goals. Key programs included: owner-occupied housing rehabilitation program and first time homebuyer program.

Financial

Administration: HOME administration costs were within the 10% cap.

Program Income (PI): In PY 2014 the City receipted \$9,055.34 in HOME program income funds. In accordance with 24 CFR 92.502(c)(3) PJs must disburse program income before drawing funds from the line of credit. This requirement is clarified in Section E Disbursement of Program Income of Notice CPD 97-9.

Deadlines for Commitments/Reservations/Disbursements: The City met its July 31, 2015 2013 commitment, 2013 CHDO reservations and 2010 disbursement deadlines.

IDIS Data: The City has established an on-going IDIS clean-up program. Please continue to monitor your HOME activities at least quarterly and visit HUD's HOME website periodically for updates on needed clean-up and overall performance data.

Match: The City of Elmira received a 100% match reduction in PY 2014, based on fiscal distress.

CHDO Issues: The HOME program requires that grantees reserve a minimum of 15 percent of their annual award to one or more Community Housing Development Organizations (CHDOs), for the development of affordable housing. During PY 2014, the City reserved and committed \$40,000.00 to its CHDO, Near Westside Neighborhood Association.

Other Issues/Recommendations/Highlights

Highlights noted during the CAPER reviews include:

- Assisted five households to become first time homebuyers
- Rehabilitated twelve owner-occupied units

Other Issues/Recommendations/Highlights: None

Section IV – Summary and Follow up

Follow Up Items

1. In future CAPERs please ensure that you provide information on the number of HOME rental projects, the number of units in each project and when they are scheduled for on-site inspection (24 CFR 92.504(d)).
2. A review of the City's PY 2014 CAPER revealed some issues that need to be addressed:

- a. IDIS activity #1954 Catholic Charities Housing Counseling Services and IDIS activity #2031 Catholic Charities Housing Counseling Services: seven of the 222 beneficiaries of activity #1954 are described as non-low/mod income persons. If CDBG funds paid for services for non-low/mod persons, please provide an explanation. If other funds paid for those services, please do not include those beneficiaries in future CAPERs. Activity #2031 is reporting eighteen non-low/mod beneficiaries.
- b. IDIS activity #2003 Owner-Occupied Housing Rehabilitation: the "Accomplishment Narrative" describes the beneficiary as low income; the "Direct Benefit Data by Households" table indicates the beneficiary is non-low/mod. Please clarify whether the beneficiary is a low/mod income person.
- c. IDIS activity #2010 Owner-Occupied Housing Rehabilitation and IDIS activity #2015 Owner-Occupied Housing Rehabilitation: both are described as one-unit projects. The "Accomplishment Narrative" describes the beneficiaries as disabled; the "Direct Benefit Data by Households" table indicates the beneficiaries are non-low/mod. Please clarify whether the beneficiaries are low/mod persons.
- d. Several public facilities and improvement activities located downtown or in the central business district (CBD) were assigned a low/mod income area (LMA) national objective. Please refer to pages 2-15 and 3-7 of the *Community Development Block Grant Program Guide to National Objectives & Eligible Activities for Entitlement Communities*.

To qualify as a low/mod income area benefit, the benefits generated by the activity must be available to all of the residents of a specific primarily residential area and at least 51% of the residents of that area must be low or moderate-income persons. Please ensure that the appropriate national objective has been assigned to those activities.

3. Please continue to monitor IDIS reports at least quarterly, to ensure that activities that are completed, but not yet closed and activities that have been listed as in final draw status for more than 120 days are reviewed and appropriate action is taken.
4. HUD's FHEO division evaluated the City's 2014 CAPER. They recommended that, if the City has not already conducted a demographic study to determine the extent of non-English-speaking population in its jurisdiction, it do so. If the study indicates that the Limited English Proficient (LEP) population exceeds 1,000 people or 5% if its total population, the City must conduct a four factor analysis and develop a Language Assistance Plan (LAP). For additional information on these issues, please contact Tammy Muffoletto, Equal Opportunity Specialist at 716-551-5755, extension 5524 or at Tammy.M.Muffoletto@hud.gov.

This report was prepared by

Linda Moore, Sr. CPD Representative
 716-551-5755 ext 5830
Linda.G.Moore@hud.gov

HUD is providing you the opportunity to review this assessment and comment. Based on the information available at the time of this review, HUD has determined that at this time, the City of Elmira has the continuing capacity to carry out the HUD programs identified in this report.

If you have any questions or would like to discuss the Assessment Report, please contact Linda Moore, Community Planning and Development (CPD) Representative at 716-551-5755 extension 5830. If you disagree with this assessment, please respond, in writing to William O'Connell, Director of Community Planning & Development – HUD, 465 Main Street, Buffalo, NY 14203. Your response should identify any areas of disagreement and corrections or any additional comments you would like HUD to consider.

If no response is received, this report is final and will be considered your community's Program Year Letter as required by HUD regulation. Consistent with the Consolidated Plan regulations, this assessment should be made available to the public. This can be accomplished by making it available through your established citizen participation process. HUD will also make it available to citizens upon request.



**CITY OF ELMIRA, NEW YORK
DEPARTMENT OF COMMUNITY DEVELOPMENT**

City Hall, Third Floor
317 East Church Street
Elmira, New York 14901

Jennifer Miller
Director

Office: (607) 737-5692
Fax: (607) 737-5696

December 18, 2015

**Mr. William O'Connell, Director of Community Planning & Development
U.S. Department of Housing & Urban Development
Buffalo Office
465 Main Street
Buffalo, NY 14203-1780**

Re: Program Year 2014 Annual Community Assessment Response

Dear Mr. O'Connell:

We are in receipt of our 2014 Annual Community Assessment and wanted to thank you and your office for reviewing the implementation and performance of the City of Elmira's CDBG and HOME Programs.

While we are in agreement over its contents for the most part, we did want to respond with comments and updates to the follow-up items listed at the end of the report.

• Updates to issues revealed in the City's PY 2014 CAPER:

- o Regarding IDIS activity #1954 and #2031 for Housing Counseling Services, CDBG funds were only used for the non-low/mod persons. Catholic Charities of Chemung/Schuyler receives other funds for those services, namely, from NeighborWorks, Catholic Charities USA, and NYS Homeowner Protection Program as listed in our CAPER under CR-15. In future CAPERs, the City of Elmira will not include non-low-mod beneficiaries paid with other funding sources.**
- o IDIS activity #2003 incorrectly indicated in the "Direct Benefit Data by Households" table that the beneficiary was non-low/mod. Our records**

have been reviewed and the beneficiary was indeed a low/mod income and IDIS has been corrected.

- IDIS activity #2010 and #2015 were incorrectly inputted as non-low/mod when in fact both beneficiaries are low/mod persons and IDIS has been corrected.
- Public Facility/Improvement activities located downtown or in the Central Business District serves a city-wide population as Elmira Downtown Development hosts several free, community-wide activities within those areas throughout the year. Additionally, the CBD also has within its boundaries several low-income housing developments including two (2) Elmira Housing Authority senior developments, Clemens Manor operated by Providence Housing, and St. Patrick's Apartments operated by Conifer to name just a few. These are all located within walking distance to where the improvements took place. We have documented our files to indicate the service area and those served by these improvements. The attached CPD map from our Consolidated Plan showing Public and Assisted Housing show a few of them and how they are centered in the center City.
 - We will continue to monitor IDIS reports at least quarterly.
 - Lastly, the City of Elmira is in the process of working on a Comprehensive Master Plan and my staff will check with our consultant team regarding whether a demographic study has been completed as part of this project. We will determine the extent of the Limited English Proficient (LEP) population. We will also follow-up with Ms. Tammy Muffoletto for additional information.

If you have any questions, please do not hesitate to contact me at (607) 737-5692 or jennmiller@cityofelmira.net.

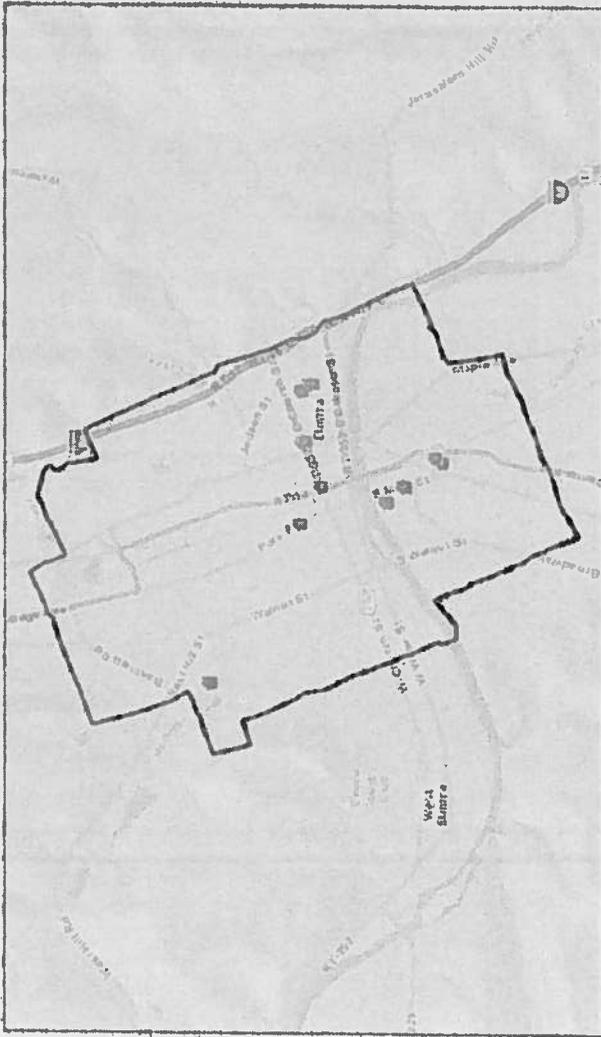
Sincerely,



Jennifer Miller
Director

Cc: Linda Moore, CPD Representative

CPD Maps - Public and Assisting Housing

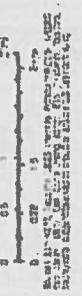


March 31, 2015

- Public Housing Development
- LURC Property
- Military Properties - Assisted

Worksheet 1

1 of 108



CPD Maps - Public and Assisting Housing

Consolidated Plan

OMB Control No: 2506-0017 (exp. 07/31/2015)

ELMIRA