



U.S. Department of Housing and Urban Development

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

NOV 04 2015.

The Honorable Elizabeth S. Rogan
President
Lower Merion Township
Board of Commissioners
75 East Lancaster Avenue
Ardmore, PA 19003-2323

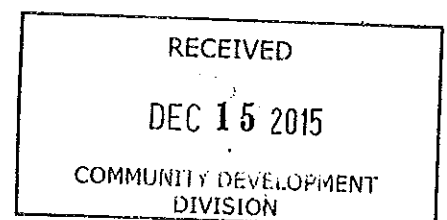
Dear Ms. Rogan:

SUBJECT: Annual Community Assessment
Township of Lower Merion
July 1, 2014 through June 30, 2015

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 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 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 Lower Merion Township's overall progress.

In making our evaluation, we relied primarily upon the Township's submission of the Consolidated Annual Performance and Evaluation Report (CAPER) for Fiscal Year 2014. This report summarized accomplishments made with funds provided from the Community Development Block Grant (CDBG) Program. In addition, we took into account technical assistance, follow up conversations with the Township's staff, and the handling of citizen comments and complaints.



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 (CAPER) 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. The Township 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 May 2, 2015, it was calculated that the Township had a balance in its line of credit of 1.20 times its annual grant and is in compliance with the 1.5 timeliness standard. However, please note that this calculation does not include any program income that the Township may have in its accounts. Thus, the figure may actually be higher.

During the 2014 program year, Township of Lower Merion has expended 100 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 Township obligated 13.07 percent of funds on public service activities, which is within the 15 percent regulatory cap. The Township also obligated 11.87 percent of its funds on planning and administration, less than the 20 percent regulatory cap.

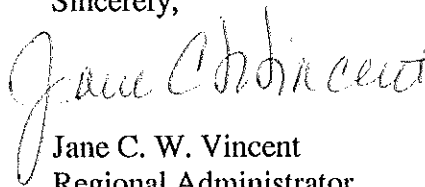
The CAPER included the Township's efforts in affirmatively furthering fair housing and identifying impediments to fair housing. The Township is actively involved in the Fair Housing Rights Center of Southeastern Pennsylvania and Genesis Housing Corporation in order to provide information, referral and counseling services to low-income residents. We commend you for these efforts. Please note that the Office of Fair Housing and Equal Opportunity (FHOO) is available to provide technical assistance regarding affirmatively furthering fair housing upon your request.

We congratulate the Township on its many accomplishments during this program year. Based on our review we have concluded that Lower Merion Township 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 Township'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 Township 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, Community Planning and Development Director, at (215) 861-7652, or Mr. Damian J. Doyle, Community Planning and Development Representative, at (215) 861-7674. This office may be reached via text telephone (TTY), by dialing (800) 877-8339.

Sincerely,



Jane C. W. Vincent
Regional Administrator

cc:

Mr. Ed LeClear