



U.S. Department of Housing and Urban Development

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

NOV 3 2017

The Honorable Daniel S. Bernheim
President, Board of Commissioners of
Lower Merion Township
75 East Lancaster Avenue
Ardmore, PA 19003

Dear Mr. Bernheim:

RE: Annual Community Assessment
Township of Lower Merion
July 1, 2016 through June 30, 2017

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 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 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 2016. This report summarized accomplishments made with funds provided from the Community Development Block Grant (CDBG) Program. This letter is a summary of our review of the township'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 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 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 May 2, 2017, it was calculated that the township had a balance in its line of credit of 0.82 times its annual grant, which is in compliance with the 1.5 timeliness standard. Please note that beginning in 2017, HUD will measure grantee compliance with the CDBG timeliness standard using the adjusted for program income ratio.

During the 2016 program year, the township reports that it expended 100 percent of its CDBG funds for activities benefiting low- and moderate-income persons, which meets the primary objective of the Housing and Community Development Act of 1974. In addition, the township spent 14.99 percent of its funds on public service activities, which is below the 15 percent regulatory cap. The township also obligated 14.69 percent of its funds to planning and administration, which is below the 20 percent regulatory cap.

The township received a CDBG grant of \$902,159 for Program Year 2016. The township expended \$1,061,910.09 of CDBG funds during the 2016 Program Year. Forty-four percent of CDBG expenditures were utilized for housing activities and 25 percent were utilized for public facilities and improvements. Eight income-eligible households were assisted with owner-occupied housing rehabilitation during the program year, one unit was sold to an income-eligible buyer, and one unit was purchased for sale to an eligible household in a future program year. The township installed new ADA curb ramps for over 6,035 people and funded renovations at three public facilities. In total, 11 percent of funds were expended in specific income-eligible areas of the township and 89 percent of funds were spent on activities that benefitted the township as a whole.

The CAPER included the township's efforts in affirmatively furthering fair housing and identifying impediments to fair housing. The township continues to fund a local Fair Housing Rights Group to provide education, outreach, and advocacy for fair housing practices and to assist with the housing discrimination complaint process. In addition, the township participated in training and webinars with social service agencies and housing providers, collaborated with market credit counseling education programs for local residents, and coordinated with service providers to incentivize production of supportive housing. 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.


HUD congratulates the township on its many accomplishments during the program year. The programs that were carried out address the highest priorities established in the Strategic Plan section of the Consolidated Plan. This has resulted in progress being made toward achieving the goals of providing decent housing, creating jobs, and enhancing the living environment.

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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 review, 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 Ms. Christine D. Jones, Senior Community Planning and Development Representative, at (215) 861-7668. Our telephone text (TTY) number for the hearing impaired is (800) 877-8339.

Sincerely,



Joseph J. DeFelice
Regional Administrator

cc:

Mr. Ernie B. McNeely
Mr. Robert Duncan