



U.S. Department of Housing and Urban Development  
Buffalo Office  
465 Main Street  
Buffalo, New York 14203-1780  
(716) 551-5755

11/17/2021

Ms. Emma Miran, Director  
Community Development Department  
City of Elmira  
City Hall – 317 East Church Street  
Elmira, NY 14901

Dear Ms. Miran:

SUBJECT: Program Year 2020 Annual Community Assessment (ACA)  
Reporting Period July 1, 2020 to June 30, 2021  
Community Development Block Grant (CDBG) Program  
Home Investment Partnerships Program (HOME) Program

Enclosed please find HUD's Annual Community Assessment (ACA) reviewing the implementation and performance of the City of Elmira's CDBG and HOME Programs. While continuing efforts are taken into consideration, this assessment primarily focuses on the 2020 program year, which covered the period July 1, 2020 to June 30, 2021.

As a result of our ACA, we have determined that your overall performance is satisfactory. The Buffalo Office is providing you thirty (30) days to respond with any comments, changes or updates. In accordance with the Consolidated Plan regulations, the ACA Letter should be made available to the public through your established citizen participation process. HUD will also make it available to citizens upon request.

If you have any questions about this report, would like to discuss the comments, or require further assistance in the administration of your community development programs, please contact Kimberly Hogan, Senior Financial Analyst, at 716-646-7017 or via email at [Kimberly.Hogan@hud.gov](mailto:Kimberly.Hogan@hud.gov).

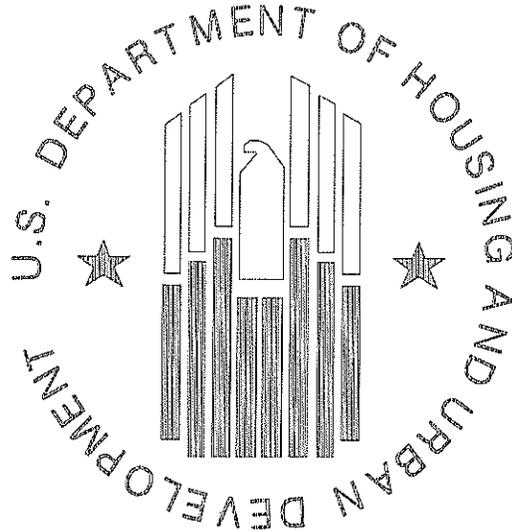
Sincerely,

A handwritten signature in black ink, appearing to read "William T. O'Connell".

William T. O'Connell  
Director  
Community Planning and  
Development Division

Enclosure

**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, 2020 – June 30, 2021**



9. Housing counseling services.
10. Façade and commercial building renovations.

The actual 2020 Program Year expenditures recorded in IDIS reflect that the City did expend HUD funds in many of 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 28, 2021. The City's 2020 CAPER was received on September 30, 2021. 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 - The City's 2020 CAPER was evaluated by HUD's FHEO Division on October 12, 2021. The evaluation was completed and FHEO determined there are areas in need of attention. Recommendations have been passed along to the grantee and should be addressed with the FHEO division directly.

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 - The CDBG and CDBG-CV programs were monitored during the program year. The most recent HUD monitoring is described below:

Programs Reviewed: CDBG & CDBG-CV  
Date of Monitoring: September 7, 2021 – September 22, 2021  
Monitoring Status: Two findings and four concerns were cited. The findings have not yet been closed.

Subrecipient Oversight & Monitoring - In PY2020 the City of Elmira funded public service activities administered by the following subrecipients: Catholic Charities of Chemung/Schuyler (pre- and post-purchase counseling and Second Place East Emergency Shelter), Ernie Davis Community Center, Southside Community Center, Let Elmira Live Center, Meals on Wheels of Chemung County, Inc., Court Appointed Special Advocates (CASA) of the Southern Tier, Inc., and Salvation Army (Pathways of Hope/SAFE House). The City monitors its subrecipients routinely, including an evaluation of performance.

Management - The City has staff capable of administering and overseeing the HUD-funded programs. A new Finance Director has recently been hired and is being trained by a former staff person in that role.

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, with the exception of the 12/31/2020 FYE Single Audit noted below.

Audits - A Single Audit must be submitted each year within nine months from the end of the City's fiscal year. The City's period ending December 31, 2020 Single Audit (due September 30, 2021) has not yet been received. The prior year audit, for the period ending December 31, 2019, was received by the Federal Audit Clearinghouse timely on 7/30/2020.

Quarterly Federal Financial Reports & Cash on Hand Reports (PR-29) - 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 2020 the City spent 100.00 percent of its non-administrative funds on activities that principally benefitted low- and moderate-income persons. Activities reported appear to meet a national objective.

*Activities:* Program activities were adequately described during the reporting period. CDBG funds were spent on activities that were eligible under program rules. These included economic development, housing, public facilities and improvements, and public services.

The City of Elmira has reported on the first 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) 2020, the City obligated 18.15 percent of its overall spending on planning and administration. This is within the 20 percent limit.

*Program Income:* The City receipted \$57,607.70 in CDBG program income in PY 2020. There were no draws against receipts for PY 2020, leaving a fund balance of \$57,607.70. In accordance with 24 CFR 570.504(b) recipients/grantees must expend program income on eligible activities before drawing funds from the line of credit.

*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 2, 2021. As of November 1, 2021, the balance of CDBG funds on Elmira's line of credit was \$2,449,926.83, which is 2.03 times the 2021 CDBG grant award of \$1,209,503.00. Based on historical performance we do not anticipate that the City will have any problem meeting its May 1, 2022 timeliness test; however, spending progress will be monitored.

*IDIS Data:* A review of the IDIS Report PR 02, List of Activities by Program Year and Project indicates that the City of Elmira maintains data in IDIS in a timely and accurate manner. The City should continue to monitor its IDIS records regarding the status of activities at least quarterly.

*Public Services:* During Program Year (PY) 2020, the City expended 11.76 percent of its overall spending on public services. This is within the 15 percent limit.

#### Other Issues / Recommendations / Highlights

CDBG highlights noted during the CAPER reviews include:

- Completed rehabilitation of 10 owner-occupied units
- Provided funding to three organizations with the goal of providing enrichment opportunities and advocacy to youth (particularly at-risk youth) and families which are located in low to moderate income neighborhoods. Southside Community Center, Ernie Davis Community Center & Let Elmira Live Center provide considerable services to the neighborhoods they serve
- Provided housing counseling to 141 households
- Provided 29 homeowners with one-on-one mortgage foreclosure prevention and loss mitigation counseling
- Assisted 570 individuals with overnight shelter and prevented homelessness for 4,183 individuals through case management and access to services at Catholic Charities' Second Place East Emergency Shelter and Prevention Program

#### CARES Act (CDBG-CV) Funds

*National Objective Compliance:* The CDBG-CV program was designed to principally benefit low- and moderate-income persons and activities are required to be directly in response to preparing for, preventing and responding to COVID-19. According to the City's CDBG-CV PR26, the City has spent 65.21 percent of its non-administrative funds on activities that principally benefitted low- and moderate-income persons. Although the overall low/mod benefit primary objective of the CDBG-CV Program must meet the minimum 70% threshold, this cannot be ultimately determined until all the funds are expended and will continue to be monitored as expenditures occur. Activities reported appear to meet a national objective and appear to be eligible.

*Activities:* In response to the COVID-19 pandemic, the City of Elmira has committed CDBG-CV funds to Emergency Mortgage and Rental Assistance, Economic Development (Small Business Fund), Public Services such as virtual learning, and Food Assistance. During PY2020, the City expended the following in CDBG-CV funds:

#### **\$234,854.89** in CDBG-CV funds

- *\$134,165.25 for public services including food assistance*
- *\$41,267.91 for economic development (small business fund)*
- *\$41,260.30 for emergency mortgage and rental assistance*
- *\$18,161.43 for administrative expenses*

Financial:

*Administration:* As of October 20, 2021, the City has expended \$27,360.99 of CDBG-CV funding on administration, amounting to 2.75 percent of the allocation. Administration costs were within the 20 percent cap.

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:* \$32,943.00 of the City's \$331,374 PY20 HOME allocation was committed to HOME administration; \$32,143.10 was disbursed. Administration costs were within the 10 percent cap.

*Program Income (PI):* The City receipted \$9,808.00 in HOME program income in PY 2020. There were draws against prior year receipts of \$9,530.00 during the Program Year, leaving a fund balance for PY 2020 of \$9,808.00. In accordance with 24 CFR 92.503(d), participating jurisdictions must commit these funds for eligible activities before HOME funds in the HOME Investment Trust Fund Treasury account are drawn.

*Deadlines for Commitments/Reservations/Disbursements:* The City's 2020 disbursement deadline is September 30, 2028.

*IDIS Data:* 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 percent match reduction in PY 2020, 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 2020, the required amount for CHDO reserve was \$49,706.10 and \$49,714.65 was reserved but not yet committed.

Other Issues/Recommendations/Highlights

HOME highlights noted during the CAPER reviews include:

- Assisted eight households to become first-time homebuyers
- Completed rehabilitation of three owner-occupied units

Other Issues/Recommendations/Highlights: None

**Section IV – Summary and Follow up**

Follow Up Items

1. A review of IDIS reports PR 01 HUD Grants and Program Income and PR 09 Program Income Detail Report by Fiscal Year and Program for the period July 1, 2020 through June 30, 2021 revealed a program income balance for the CDBG and HOME programs in PY 2020. In accordance with 24 CFR 570.504(b) and 24 CFR 92.503(d) recipients/grantees should disburse program income before drawing funds from the line of credit. Please ensure this is completed going forward.
2. 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.
3. The City is encouraged to seek alternative methods to increase public participation in the citizen participation process. Please include these results in the upcoming Annual Action Plan and CAPER.
4. The City should address all Fair Housing questions and concerns to Katelynn Debbie, Equal Opportunity Specialist Intern at [Katelynn.P.Debbie@hud.gov](mailto:Katelynn.P.Debbie@hud.gov).
5. The City is encouraged to remain actively involved with the local Continuum of Care (CoC).

This report was prepared by: Kimberly Hogan, Senior Financial Analyst  
716-646-7017  
[Kimberly.Hogan@hud.gov](mailto:Kimberly.Hogan@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 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 Kimberly Hogan, Senior Financial Analyst at 716-646-7017. If you disagree with this assessment, within 30 days please respond, via email to: [William.T.OConnell@hud.gov](mailto:William.T.OConnell@hud.gov). Your response should identify any areas of disagreement and corrections or any additional comments you would like HUD to consider.