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U.S. Department of Housing and Urban Development

DEPT. OF COMMUNITY AND
BUSINESS DEVELOPMENT

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

OCT 17 2014

The Honorable Robert G. Loughery
Chairman
Bucks County Board of Commissioners
Administration Building
55 East Court Street, 5th Floor
Doylestown, PA 18901

Dear Mr. Loughery:

SUBJECT: Annual Community Assessment
Bucks County, Pennsylvania
April 1, 2013 through March 31, 2014

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 Bucks County's overall progress. The County received an extension on the submission of its CAPER report until August 21, 2014 due to administrative demands and vacant staff positions.

In making our evaluation, we relied primarily upon the County's submission of the Consolidated Annual Performance and Evaluation Report (CAPER) for Fiscal Year 2013. This report summarized accomplishments made with funds provided from the Community Development Block Grant (CDBG), Home Investment Partnerships (HOME), and Emergency Solutions Grant (ESG) Programs. In addition, we took into account technical assistance, follow up conversations with County 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 County provided performance measures as required.

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 test was conducted on January 31, 2014, it was calculated that Bucks County had a balance in its Line-of-Credit of 1.46 times its annual grant. The County's next test date on January 31, 2015.

During the 2013 program year, Bucks County expended 89.99 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 County obligated 10.19 percent of funds on public service activities, which is within the 15 percent regulatory cap. The County also obligated 15.84 percent of its funds on planning and administration, less than the 20 percent regulatory cap.

The County has met the HOME requirements for expenditure by committing all funds to projects within two years and expending funds within five years. Although the County had some challenges with the Integrated Disbursement Information System (IDIS) in fully committing the 2012 HOME funds, together with HUD Headquarters, we were able to resolve the issues and accept the County's information as timely. The requirement to provide at least 15 percent of HOME funding to Community Housing Development Organizations has also been achieved. We also remind grantees that all HOME projects should be closed within 120 days of their final draw.

The CAPER included the County's efforts in affirmatively furthering Fair Housing. The County updated its Analysis of Impediments to Fair Housing in 2014 in cooperation with Bensalem Township, a member of the County's HOME Consortium. The County will continue to promote affirmative marketing of publically funded housing and rental assistance through the HOME Program. Please note that the Office of Fair Housing and Equal Opportunity (FHCO) is available to provide technical assistance regarding affirmatively furthering fair housing upon your request.

We encourage the County to maximize its use of HOME funds to develop more affordable units to meet the needs of the County's low-income residents. The County is continuing to work with the community to educate agencies that operate rental housing and landlords to have certified lead inspectors determine the presence of lead-based paint and take appropriate remedies.

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 County'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 County 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. The Philadelphia Regional Office looks forward to working with the new Director of the Bucks County Office of Housing and Community Development, Mr. Roger Collins. As always, this office is available to provide the County with Technical Assistance as needed. 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. Andrea Edwards, Economic Development Specialist, at (215) 861-7658. This office may be reached via text telephone (TTY), by dialing (215) 656-3452.

Sincerely,

/s/ Richard M. Ott

JUR
Jane C. W. Vincent
Regional Administrator

cc:

Ms. Lynn Bush

✓ Mr. Roger Collins

Ms. Martha Woglom