



U.S. Department of Housing and Urban Development

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

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DEPT OF COMMUNITY AND
BUSINESS DEVELOPMENT

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, 2014 through March 31, 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 Bucks County's overall progress.

In making our evaluation, we relied primarily upon Bucks County's submission of the Consolidated Annual Performance and Evaluation Report (CAPER) for Program Year 2014. 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 Bucks County staff, and the handling of citizen comments and/or complaints. Bucks County received an extension on the submission of its CAPER report until September 30, 2015, due to adjustments in staff and program coordination in an effort to ensure that your funded activities were implemented in full conformance with the various program requirements.

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 CAPERs 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. Bucks County 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 CDBG 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, 2015, it was calculated that Bucks County had a balance in its line-of-credit of 1.45 times its annual grant, which is in compliance with the requirement. Bucks County's next test date is January 31, 2016.

According to the CAPER, during Program Year 2014, Bucks County expended 89.99 percent of its CDBG funds for activities benefiting low and moderate-income persons, which exceeds the primary objective of the Housing and Community Development Act of 1974. In addition, Bucks County expended 10.19 percent of funds on public service activities, which is within the 15 percent regulatory cap. Bucks County also expended 15.84 percent of its funds on planning and administration, which is within the 20 percent regulatory cap.

Bucks County met the HOME requirements for the expenditure of HOME funds within five years and in providing at least 15 percent of HOME funding to Community Housing Development Organizations (CHDOs). However, based on a procedural error in the completion of the environmental review process, Bucks County missed the HOME commitment deadline for committing all funds to projects within two years, which occurred on July 31, 2015. As such, \$971,014 of HOME funds was subject to recapture. Bucks County has submitted the requested documentation in support their efforts to commit HOME funds for the Jackson Village Affordable Housing Project prior to the deadline. These items are currently under HQ review to determine compliance with the HOME regulations. A formal determination on the review will be forthcoming.

As is required by OMB Circular A-133, Bucks County's Single Audit for the Fiscal Year ending December 31, 2013 was due on September 30, 2014. To date, it has not been submitted. Based on a review of the Federal Audit Clearinghouse, Bucks County has consistently been late in submitting audits for multiple years. We remind you of Bucks County's obligation to comply with the requirements outlined in OMB Circular A-133. Bucks County's FY 2013 A-133 single audit must be submitted immediately.

Bucks County updated its Analysis of Impediments (AI) to Fair Housing in 2014 in cooperation with Bensalem Township, a member of the Bucks County's HOME Consortium. As noted in your Program Year 2015 award letter, dated October 27, 2015, while the updated AI contains detailed background information regarding both communities, the AI does not expressly identify the impediments to fair housing choice facing these communities or the actions the jurisdictions propose to take to eliminate those impediments.

The Office of Fair Housing and Equal Opportunity (FHEO) had the following comments and recommendations on the CAPER:

- **Comment:** FHEO commends the County for providing the race/ethnicity data for their CDBG, HOME, and ESG programs, as well as providing information regarding the accessibility projects completed to assist persons with disabilities. Based on the narrative provided by the County, as well as a review of the IDIS reports, the County is providing assistance/services to the minority and Hispanic communities.
- **Recommendation:** FHEO recommended that Bucks County update the 2014 joint AI and identify the impediments that affect fair housing choice in the jurisdiction. The sample chart below is used by several HUD entitlement jurisdictions to track and monitor their progress on addressing identified impediments to fair housing choice, including affordable housing activities. Although this chart is not a HUD requirement, this chart or a similar chart can be useful for tracking milestones and timeframes.

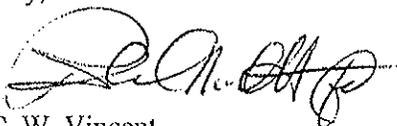
IMPEDIMENT(S) TO BE ADDRESSED (list by degree of importance)	GOALS (What do you hope to achieve?)	STRATEGIES TO MEET THE GOALS (How will you achieve your goals?)	RESPONSIBLE ENTITIES ASSIGNED TO MEET GOALS (Identify the organizations who will be undertaking the impediment)	BENCHMARK (In which year of your Con/Plan do you plan to achieve this?)	PROPOSED INVESTMENT (Amount of money) (Funding Source)	YEAR TO BE COMPLETED (Is it contained in your Consolidated Plan/Action Plan Goals?)	DATE COMPLETED (Identify which year of the Consolidated Plan the action was addressed)	IF THE IMPEDIMENT WAS NOT ADDRESSED, PROVIDE AN EXPLANATION AS TO WHY AND WHEN

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.

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 have no comments relative to the analysis contained in this letter, 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 Bucks 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, interested citizens' organizations, and non-profit entities of its availability. If, for any reason, you choose 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. This office may be reached via text telephone (TTY) by dialing (800) 877-8339.

Sincerely,



Jane C. W. Vincent
Regional Administrator

cc:
Ms. Lynn T. Bush
/ Mr. Roger C. Collins