

# U. S. Department of Housing and Urban Development



Community Planning and Development

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August 24, 2016

Ms. Rebecca L. Safarik, Assistant City Manager  
City of Greeley  
1000 10<sup>th</sup> Street, Suite 202  
Greeley, CO 80631

Dear Ms. Safarik:

Community Planning and Development (CPD) is striving to strengthen its working relationship with our State and local government partners to help achieve greater results in meeting the housing and community development needs of our low- and moderate-income customers. One of our important responsibilities in this ongoing process is the periodic assessment of your accomplishments and performance in the administration of funds provided by CPD and in meeting key program and Departmental objectives, as mandated by the statutes governing these programs.

This review examines information provided by the City of Greeley, CO. In conducting this assessment, we examine your activities for consistency with the priorities and objectives outlined in the Consolidated Plan and Annual Action Plan. We use the information contained in the Consolidated Annual Performance and Evaluation Report (CAPER), and the Integrated Disbursement Information System (IDIS) as well as any monitoring reviews conducted during the course of the program year.

Our assessment report that is enclosed covers the following areas:

- Meeting the statutory purposes of the programs
- Consistency with strategies and goals in the Consolidated Plan and Annual Action Plan
- Performance Measures
- Overall Benefit
- Timeliness
- Caps on Obligations: CDBG Administration, Public Service; HOME CHDO, Administration
- Fair Housing and Equal Opportunity

Based upon our analysis and examination of the data available to us, we have determined that the City's overall progress has been satisfactory during the most recent program year. The City of Greeley appears to be administering its programs in a manner consistent with the applicable regulatory requirements. During the period January 1, 2015, through December 31, 2015, Greeley has carried out its program substantially as described in its Consolidated Plan and has the continuing capacity to carry out its approved program in a timely manner.

These conclusions on your overall program performance are based solely upon the information available to this office and do not constitute a comprehensive evaluation or approval of specific activities.

You have the opportunity to provide us with your review and comment on the draft Annual Community Assessment. Please provide any review and comment within 30 days of the date of this letter. We may revise the Assessment after considering your views. If we do not receive any response by the end of the 30-day period, the draft Annual Community Assessment will become final without further notice.

The final Annual Community Assessment must be made readily available to the public. You can assist us in this regard by sharing the final Annual Community Assessment with the media; with a mailing list of interested persons; with members of your advisory committee; or with those who attended hearings or meetings. You must also provide a copy of the final Annual Community Assessment to your independent public auditor. HUD will make the final Annual Community Assessment available to the public upon request and may provide copies to interested citizens and groups.

If you have any questions, please do not hesitate to contact Yvonne Pier, Financial Analyst, at (303) 672-5002.

Sincerely,



Aaron Gagne  
CPD Director

Enclosure

cc: Mr. J.R. Salas, Manager, GURA  
Carol E. Larsen, Grants Specialist, GURA

## ANNUAL COMMUNITY ASSESSMENT

**JURISDICTION:** City of Greeley, Colorado

**PROGRAM YEAR START:** January 1, 2015

**PERIOD COVERED BY ASSESSMENT:** January 1, 2015 - December 31, 2015

HUD requires an annual review of performance by grant recipients according to the provisions of the Housing and Community Development Act, and the National Affordable Housing Act. We must determine that each recipient is in compliance with the statutes and has the continuing capacity to implement and administer the programs for which assistance is received. This reports the results of our review of the Consolidated Annual Performance and Evaluation Report (CAPER) for the 2015 program year, the first year of the 2015-2019 Consolidated Plan.

### Part I. Summary of Consolidated Plan/Action Plan Review and Assessment

The City of Greeley is meeting the primary objectives of the Community Development Block Grant (CDBG) Program and HOME Investment Partnerships (HOME) Program, which is the development of viable urban communities by providing decent housing, a suitable living environment and expanding economic opportunities, principally to persons of low- and moderate-income (LMI). Consistent with this primary objective, not less than 70 percent of the aggregate of the Federal assistance shall be used for the support of activities that benefit persons of low- and moderate-income for the one-year grant certification period of 2015. The City of Greeley expended 100 percent of available activity funds for LMI activities. The City has met the aggregate standard by exceeding the 70 percent expenditures to benefit LMI persons.

The regulations at 24 CFR § 91.520(g) require “the [annual] report will include a comparison of the proposed versus actual objectives for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives.” Based on the City’s CAPER submission, projects funded in the current program year are consistent with strategies and goals in the Consolidated Plan and Annual Action Plan.

The CAPER for the City provides an assessment of the FY2015 goals and objectives accomplished, which included the following accomplishments:

Objective	5 year goal	1 year goal	Actual Accomplishments
Affordable Housing	5 New 75 Rehab	9 New 13 Rehab	10 New 13 Rehab
Public Service – Non-profit	75 persons assisted	182 persons assisted	2015: 186 persons assisted Cumulative: 186 persons assisted
Property Acquisition, demo, clearance disposition	30 persons assisted	300 households assisted	2015: 0 households assisted Cumulative: 0 households assisted

Public Service – Property Conditions	10,500 persons assisted	1,500 persons assisted	78,905 persons assisted Cumulative: 78,905 persons assisted
Public Improvements	21,000 persons assisted	3,000 households assisted	2015: 5,153 households assisted Cumulative: 5,153 households assisted

The CAPER indicates that the City of Greeley is performing well in terms of meeting its 2015 goals, and is to be congratulated. The summary of actual accomplishments is outlined in the CAPER and it appears that they have surpassed the goals or are within a reasonable margin. The City did note that they continue to work with FEMA on a grant that will remove a 40-unit mobile home park from a floodway, therefore a large portion of that activity's funds are being reserved until a decision on the FEMA grant has been made. The City must include narratives on:

- Explanation of how they arrived at the number of persons assisted for the city-wide clean-up weekend.
- Actions taken to foster and maintain affordable housing in accordance with 24 CFR 91.220(k); 91.520(a).
- Actions taken to reduce the number of poverty-level families in accordance with 24 CFR 91.220(k); 91.320(j) — states
- Actions taken to address the needs of public housing in accordance with 24 CFR 91.520(a).

We are working with the City of Greeley to bring these narratives up to par for the current CAPER, but also request that the City of Greeley ensures future CAPERs address the required topic.

## Part II. Summary of Grantee Performance

### CDBG

HUD will consider an entitlement recipient to be failing to carry out its CDBG activities in a timely manner if 60 days prior to the end of the grantee's current program year, the amount of entitlement grant funds available to the recipient under grant agreements but undisbursed by the U.S. Treasury is more than 1.5 times the entitlement grant amount for its current program year.

The City of Greeley had 1.32 grant years' worth of funds remaining prior to the end of the program year. We congratulate the City for expending its funds in a timely manner, and urge you to continue to meet this important measure of performance.

The City is limited to 20 percent obligation of grant funds and current year's program income for administrative expenses. The City of Greeley obligated 18.89 percent of grant funds for administration, within the allowable amounts. Public service obligations are likewise limited to 15 percent of grant funds and prior year program income. The City of Greeley spent 5.14 percent of the funding on public service activities, within the allowed amounts.

## HOME

Per the HOME Deadline Compliance Status Reports dated May 24, 2016, Greeley is in compliance with the two-year commitment and CHDO reservation requirements for 2014 HOME funds and the five-year expenditure requirements for 2011 HOME funds.

HOME regulations also require that match contributions must total not less than 25 percent of funds drawn from the jurisdiction's HOME Investment Trust Fund Treasury account in that fiscal year. Greeley's HOME Match Report indicates \$4,173,045 in excess match at the end of the program year (December 31, 2015) after deducting the current match liability of \$35,098.

The City of Greeley met its HOME matching requirements through resources made available of \$1,011,774. The City did not receive any state or local funds that were used to assist with the City's HOME activities. Private match all came from the Habitat North subdivision, who is well supported by private cash donations from individuals, corporations, donated services and materials, and volunteer labor. Excess match carried over to the next fiscal year is \$4,137,947. The PR 33 HOME Matching Liability Report disbursements required match to be \$215,274.74. The City's total disbursements related to match were \$235,827.29, exceeding the City's 12.5 percent match requirement.

The HOME PJ's Status of Open Activities Report dated August 10, 2016, lists three projects with funds partially drawn down with activity noted in the last 26 days, and list no activities in final draw for over 120 days.

## FAIR HOUSING AND EQUAL OPPORTUNITY

The Office of Fair Housing and Equal Opportunity (FHEO) received the city's CAPER and has completed its review of Greeley's submission. Based on the fair housing and civil rights information submitted in this document, they have determined that Greeley is a *Low* risk. Specifically, FHEO reviewed the subject submission to determine the level of information demonstrating that the grantee is complying with the four applicable civil rights laws and implementing regulations.

As a reminder, please start considering the process and preparation of your jurisdictions plan for compliance with the new Affirmatively Furthering Fair Housing regulations. For your program, the first plan will be due on April 6, 2019. We anticipate that training will start to be offered for that compliance in early 2016, and look forward to working closely with you to ensure a smooth process.

## INTEGRATED DISBURSEMENT AND INFORMATION SYSTEM (IDIS)

The IDIS reports indicate that the City of Greeley is consistently entering data and information into IDIS. A comprehensive summary of the PR 26 CDBG Financial Summary Report is included with the CAPER and made available to citizens. The additional lists and tables included in the CAPER clearly summarize information, making the report more useful to citizens.

Our review of the PR 03 CDBG Activity Summary Report for Program Year 2015 indicates that thorough activity descriptions are entered and maintained, which also contributes to clarity. No flagged activities were found. Overall, the City of Greeley is using IDIS in a satisfactory and useful manner.

### **Part III. HUD Evaluation and Conclusions**

#### **A. OVERALL EVALUATION**

Overall, the City of Greeley appears to be making strides in providing affordable housing and addressing its community development needs through its 2015 program year activities.

#### **B. CONCLUSIONS AND FINDINGS**

Community Planning and Development (CPD), HUD Region VIII, has reviewed available facts and data pertaining to the performance of the City of Greeley for its Consolidated Plan, Community Development Block Grant and HOME Investment Partnerships programs during the period specified above. Based on the overall review record and the information summarized above, CPD makes the following findings:

1. During the period specified above, the City of Greeley has carried out its program substantially as described in its Consolidated Plan as approved and amended.
2. The Consolidated Plan, as implemented, complies substantially with the requirements of applicable laws and regulations.
3. The City of Greeley has the continuing capacity to carry out its approved program in a timely manner.