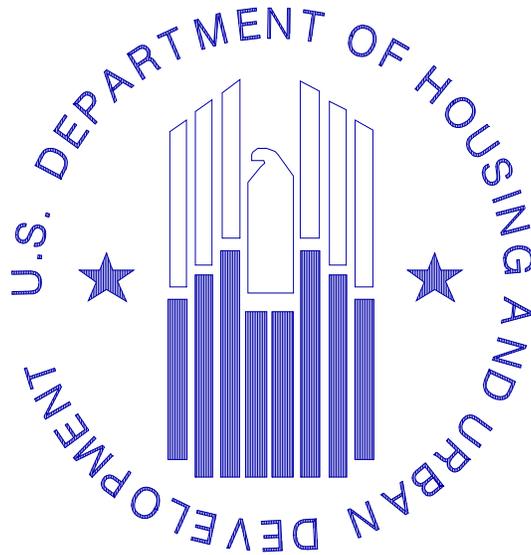


**U.S Department of Housing & Urban Development
Buffalo, New York Office**



Annual Community Assessment Report

for

Cheektowaga, New York

**Covering the Program Years of
April 1, 2015 – March 31, 2016
April 1, 2016 – March 31, 2017
April 1, 2017 – March 31, 2018**

INTRODUCTION

The Town of Cheektowaga, as a recipient of HUD Community Development Block Grant (CDBG) funding, is required to annually review and report on its progress in carrying out the goals and priorities of its Consolidated Plan. The Consolidated Annual Performance and Evaluation Report (CAPER) is designed to be a tool to report the activities undertaken during the previous year to both HUD and local community stakeholders and residents. Prior to submission to HUD, a grantee must make its CAPER available for review by interested citizens and stakeholders.

HUD has a responsibility to review the CAPER and the community's performance on an annual basis. HUD relies on the CAPER, financial data and audits, program records, on-site monitoring and other resources to evaluate a grantee's overall performance and effectiveness. This review is an on-going process; however, this report summarizes a community's performance and its continuing capacity to administer HUD funds. This report is prepared to provide feedback on your community's performance in the delivery of programs and services using HUD Community Development funds. This report consists of four sections:

- Section I provides a general overview regarding compliance and reporting accuracy
- Section II evaluates grantee performance in key crosscutting functions
- Section III evaluates the progress and performance of each specific HUD program
- Section IV provides recommendations and follow-up activities, if applicable

Assessment Period:	April 1, 2015 – March 31, 2016
	First Year of a 5-Year Consolidated Plan
	April 1, 2016 – March 31, 2017
	Second Year of a 5-Year Consolidated Plan
	April 1, 2017 – March 31, 2018
	Third Year of a 5-Year Consolidated Plan

Programs Administered & 2015 Funding Amounts:	
Community Development Block Grant (CDBG)	\$916,326
Programs Administered & 2016 Funding Amounts:	
Community Development Block Grant (CDBG)	\$905,897
Programs Administered & 2017 Funding Amounts:	
Community Development Block Grant (CDBG)	\$910,260

Section I - Summary of Consistency with Consolidated Plan & Annual Action Plans

HUD's review of the CAPER determined that Cheektowaga followed the HUD-approved Consolidated Plan and Annual Action Plan during the 2015, 2016 and 2017 program years (PY). The activities undertaken during the year are consistent with Cheektowaga's 2015-2019 Consolidated Plan goals, objectives and priority needs. These goals, objectives and priority needs

as stated in Cheektowaga's 2015-2019 Consolidated Plan included the following high priority elements:

1. Improve housing stock through rehabilitation of existing low-income owner-occupied housing, including substantial rehabilitation.
2. Promote home ownership for low-moderate income households by providing purchase assistance to first-time low to moderate income home buyers
3. Provide assistance and counseling to families or individuals who are homeless or in imminent danger of being homeless.
4. Assist frail seniors by purchasing a wheelchair accessible van for appointment and shopping trips.
5. Maintain and rehabilitate renter-occupied low-income housing.
6. Assist low income renters and homeowners with weatherization.
7. Promote and support Fair Housing to prevent discrimination in housing and workplace.
8. Preserve historic sites and eliminate slum and blight in neighborhoods.
9. Provide community services to improve quality of life in neighborhoods and meet the needs of youth.

The actual 2015, 2016 and 2017 Program Year expenditures recorded in IDIS verify that Cheektowaga did expend HUD funds in these broad categories and within the requirements of HUD funding regulations. More information about accomplishment can be found in Section III of this report.

Performance Reports / CAPER Completeness

A Consolidated Annual Performance and Evaluation Report (CAPER) is due 90 days after Cheektowaga completes its program year; the deadline would be June 30th. HUD received Cheektowaga's 2015 CAPER on July 1, 2016, the 2016 CAPER on August 11, 2017, and the 2017 CAPER on June 30, 2018. The reports were determined to be substantially complete, including providing an adequate description of Cheektowaga'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

Fair Housing and Equal Opportunity - Our review did not reveal any significant issues related to compliance. The FHEO Division had no recommendations for PY 2015, 2016 and 2017.

Citizen Participation – Cheektowaga followed its Citizen Participation Plan. If comments were received, they were not provided.

Compliance Monitoring – The CDBG Program was last monitored by HUD in 2014 and again in 2019. There were no findings/concerns.

Subrecipient Oversight & Monitoring – Cheektowaga has three subrecipients who are the Villages of Sloan and Depew and the Cheektowaga Economic Development Corporation (CEDC). The Town monitors them through on-site visits throughout the year. The Town has actively sought input from residents on its programs and strategies through staff attendance at neighborhood meetings and comment cards distributed by the police on foot and bike patrols.

Management – Cheektowaga has staff and consultants that are experienced and very capable of administering and overseeing the HUD-funded programs.

Financial – The financial information reported by Cheektowaga 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 CDBG Planning and Administration cap in PY 2017 which is explained in Section III.

Audits - A Single Audit must be submitted each year nine months from the end of Cheektowaga’s fiscal year. The following is the status for Cheektowaga’s Single Audit Report:

- 2015 – timely filed, no findings but FFRs to have been submitted since 2014.
- 2016 – timely filed, no findings
- 2017 – timely filed, no findings

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 Cheektowaga’s PR26, Cheektowaga spent the following on activities that principally benefitted low-moderate income people:

- 2015 – 93.64%
- 2016 – 99.96%
- 2017 – 100%

The activities reported appear to meet a national objective.

Activities: Program activities during the reporting period were adequately described. CDBG funds were spent on activities that were eligible under program rules.

Cheektowaga reported on the first three years of a five-year strategic plan. The CAPER and IDIS indicate that the Town is making progress in meeting the plan’s stated numeric goals for specific activities.

Financial:

Planning and Administration: The financial analysis component of our review requires an “origin-year” expenditure test as well as a program-year obligation test to determine if Cheektowaga is within the 20% planning and administrative expenditure cap for CDBG funding. The origin year expenditure test performed for grant year 2015 and 2016 showed that it was under the 20% cap at 18.71% and 16.75% respectively. The program obligation test was met in PY2015 and PY2016.

The PY2017 origin year test was over the 20% cap at 28.38% or \$76,293. The Town may verify whether any program delivery expenses were misclassified to administration in PY2017. If not, the Town must re-pay the overage.

Cheektowaga's obligation test was originally over the 20% cap for PY2017 by 2.05%. The Town reduced the overage from 22.05% to 20.47% by reclassifying several program delivery costs from 21A to 18B. If Cheektowaga remains over the cap at 20.47% due to unforeseen legal costs associated with two defaulted CEDC loans, \$6,354.99 must be repaid.

Expenditure Timeliness: The CDBG program requires that, 60 days before the end of the program year, Cheektowaga's unexpended CDBG funds, including Program Income, be no more than 1.5 times its annual grant. This requirement became effective for PY 2016.

Cheektowaga met the timeliness test for PY 2016 with a ratio of 1.43% and for PY 2017 with a ratio of 1.36%.

Public Services: Cheektowaga was under the 15% cap. The Town expended 5.13% of its PY 2015 funds on public services activities, 6.68% of its PY 2016 funds and 10.87 % of its PY 2017 funds.

Monitoring: HUD did not monitor this program in 2015, 2016 or 2017. The Town was monitored in 2019 and there were no Findings or Concerns.

Home Investment Partnerships Program (HOME) Grant

The Town is not a HOME grantee; however, as a member of the Amherst-Cheektowaga-Tonawanda HOME Consortium, it receives a portion of Amherst's HOME allocation. Cheektowaga's HOME activities are included in the Amherst CAPER.

Section IV – Summary and Follow up

The following determinations have been made relative to Cheektowaga's capacity to carry out CDBG funded activities:

1. Cheektowaga has carried out its program substantially as described in its Consolidated Plan submission.
2. The Consolidated Plan submission as implemented complies with the requirements of the Housing and Community Development Act of 1974, and other applicable laws and regulations.
3. Cheektowaga was originally over the 20% cap for PY2017 by 2.05%. The Town reduced the overage from 22.05% to 20.47% by reclassifying several program delivery costs from 21A to 18B. If Cheektowaga remains over the cap at 20.47% due to unforeseen legal costs associated with two defaulted CEDC loans, \$6,354.99 must be repaid.

4. The PY2017 origin year test was over the 20% cap at 28.38% or \$76,293. The Town may verify whether any program delivery expenses were misclassified to administration in PY2017. If not, the Town must re-pay the overage.
5. Cheektowaga has the continuing capacity to carry out the approved program in a timely manner