



**U.S. Department of Housing and Urban Development**

**Hartford Field Office  
Office of Community Planning & Development  
20 Church Street, 10<sup>th</sup> Floor  
Hartford, Connecticut 06103-3220**

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**MAY 11 2018**

Mr. Tyler Fairbairn  
Community Development Administrator  
Greenwich Town Hall  
101 Field Point Road  
Greenwich, CT 06830

Dear Mr. Fairbairn:

The Town of Greenwich received \$719,137 in Community Development Block Grant (CDBG) funds in Grant Year 2017. This report is HUD's assessment on the use of those funds.

The Housing and Community Development Act of 1974, as amended, and the National Affordable Housing Act of 1990, require that grant recipients submit annual performance reports for the programs covered under these Acts. The Acts also require the Secretary of HUD to determine annually that the grant recipient is in compliance with these statutes and has the continuing capacity to carry out the programs for which it receives funds.

HUD's review includes an analysis of each grantee's planning process; its management of funds; progress in carrying out the strategies and goals expressed in the Consolidated Plan; compliance with statutory and regulatory requirements; accuracy of required performance reports; and evaluation of the Town's accomplishments in meeting key departmental objectives. HUD's Annual Assessment is directed not only toward meeting the mandates of the statutes, but to provide the basis for working together collaboratively to achieve the revitalization goals of Greenwich's community. HUD congratulates the Town on its many accomplishments during this past year regarding the achievement of Departmental Objectives.

**Noteworthy Accomplishments**

In furtherance of its three objectives identified in the Town's 2015 -2019 Consolidated Plan (suitable living environment, affordable and decent housing, and expanding economic opportunities), in the 2017 grant year, Greenwich funded a number of activities to ensure accessibility, availability and improvement in the quality of services for the benefit of its low- and moderate-income residents.

### Creating Suitable Living Environment

The Town supported a number of activities that provided non-homeless special needs housing and supportive services. Specifically, the Town targeted activities that benefited seniors, persons with disabilities, persons with substance abuse disorders and residents of public housing.

- Greenwich granted \$5,000 in CDBG funds to Inspirica's Jumpstart Career Program Specialist. The Jumpstart Career Program was to provide for an employment specialist to help participants with core skills needed to find, maintain, and advance in employment. Inspirica used the Jumpstart Career Program to make 54 job placement and guide 11 income-eligible person through a home health aide course. A total of 100 extremely low-income clients benefited from this activity;
- The Town granted \$8,000 to Community Centers, Inc. for comprehensive educational programs, family and group counseling and therapeutic recreational programs servicing 322 "young people" ages 6 to 19 and their families who reside in public housing;
- The Town granted \$7,000 to Family Center's Armstrong Court Preschool Program for a comprehensive and development services to low-income preschoolers living in Greenwich. The program is open 50 weeks of the year and maintains full enrollment throughout. Special efforts are made to ensure that the highest risk and most vulnerable students are served in available preschool slots. A total of 257 low- to moderate-income individuals benefitted from this activity;
- Greenwich provided \$5,000 in CDBG funds to the YWCA of Greenwich's DAS Crisis Intervention Services for crisis intervention counseling, emergency assistance, and safety planning services to 731 victims of domestic violence; and
- The Town provided \$5,000 to the Food Bank of Lower Fairfield County in CDBG funds for food benefiting 6,127 people, who otherwise are unable to afford to purchase food.

### Expanding Economic Opportunities

In Grant Year 2017, CDBG-funded services were provided to programs focused on assisting residents with obtaining employment or increasing their level of employability. The Town granted \$5,000 to Reaching Independence Through Employment (RITE) of the Family Centers, Inc. The goal of this program is to increase employability through comprehensive vocational case management, job development and work retention services to 306 public housing and Section 8 residents.

These activities benefited extremely low, low- and moderate-income individuals in the Town of Greenwich.

## Financial

### REVIEW OF LOCCS – CDBG

<u>PROJECT NUMBER</u>	<u>AUTHORIZED</u>	<u>DISBURSED</u>	<u>BALANCE</u>
B14MC0-90015	\$735,628.00	\$734,867.01	\$ 760.99
B15MC0-90015	\$736,509.00	\$432,171.79	\$ 304,337.21
B16MC0-90015	\$736,876.00	\$271,923.62	\$466,952.38
B17MC0-90015	\$719,137.00	\$335,559.78	\$383,577.22

HUD analyzed the CAPER financial review and reconciliation to the Line of Credit Control System (LOCCS). The results of the review disclosed that the Town of Greenwich has complied with financial reporting requirements for the 2017 grant year. The Federal Cash Report (SF-425) was submitted on April 20, 2018, for the 1st<sup>h</sup> quarter of 2018.

### Area of Concern

The IDIS report PR02 shows that the Town of Greenwich has fifteen activities from Grant Years 2015-2017, with funds totaling a zero balance in an open status. Please explain. The following activities should be examined:

<u>Year</u>	<u>Activity#</u>	<u>Name</u>	<u>Balance</u>
(2015)	589	-PY2015 CDBG Contingency/Unprogrammed Funds	\$ -0-
(2015)	587	-Parsonage Cottage Home for the Aged- Ramp Relocation/Porch Extension/Dinging Room Project	\$ -0-
(2016)	607	-Domus Kids – Domus House Renovation (Fire Doors, Privacy Knobs/Locks)	\$-0-
(2016)	611	-Insprica – Family Housing Program Interior	\$-0-
(2016)	616	-YMCA of Greenwich – St. Roch’s Childcare Center Flooring Replacement	\$-0-
(2016)	617	-Friends of Laurel House Purchase of a New Vehicle for Laurel House Programs and Services	\$-0-
(2016)	618	-TAG Acquisition of a Handicapped-Accessible Vehicle	\$-0-
(2017)	620	- PY 2017 Child Guidance Center – Mental Health Assessment, Treatment & Support Services	\$-0-
(2017)	622	- PY 2017 Community Health Center, Inc. Senior Dental Assistance Program	\$-0-
(2017)	629	- PY2017 Jewish Family Services – Supermarketing for Seniors Program	\$-0-
(2017)	633	- PY 2017 Old Greenwich Riverside Community Center ORGRCC Childcare Program	\$-0-
(2017)	634	- PY 2017 Shelter for the Homeless – Emergency Meals Program	\$-0-

(2017)	635	- PY2017 YWCA of Greenwich – DAS Crisis Intervention Project	\$-0-
(2017)	636	- PY 2017 Abilis – HQ Parking Lot Expansion and Repayment Project	\$-0-
(2017)	639	- PY 2017 Shelter for the Homeless - Emergency Shelter Bed Replacement	\$-0-

The IDIS report PR02 shows that the Town of Greenwich has 14 funded projects from Grant Year 2015 through 2017 with remaining funds. Please take the necessary actions to complete these activities and change the status from “Open” to “Completed” as soon as the accomplishment and beneficiary data has been entered. The following activities should be examined:

<u>Year</u>	<u>Activity #</u>	<u>Name</u>	<u>Balance</u>
(2015)	581	–Greenwich Adult Day Care - Waterproof And Repointing of River House (Phase II)	\$ 15,000.00
(2015)	583	- Housing Authority of the Town of Greenwich- Armstrong Court Boiler Replacement (Phase II)	\$239,304.21
(2015)	586	–Neighbor-to-Neighbor – New HQ Construction Project	\$ 50,000.00
(2016)	608	–Greenwich Adult Day Care–Waterproofing And Repointing of River House (Phase II)	\$ 15,000.00
(2016)	610	–Housing Authority of Town of Greenwich- MKTII Exterior Cornice and Gable Repair	\$164,700.00
(2016)	613	–Neighbor to Neighbor – New HQ Construction	\$ 50,000.00
(2016)	614	–Parsonage Cottage Home for the Aged - Boiler and Hot Water Heating System Replacement	\$103,834.37
(2016)	619	–Contingency/Unprogrammed Funds	\$ 13,876.00
(2016)	615	–The Hill House – Hill House Upgrades and Improvements	\$ 760.99
(2016)	606	–Boys and Girls Club – Facility Security Improvements Project	\$ 25,055.00
(2016)	609	–Greenwich Historical Society – Installation of a Handicapped-Accessible Elevator (Phase I)	\$ 25,000.00
(2017)	626	- PY2017 Greenwich Adult Day Care – River House Wellness Therapy Program	\$100.00
(2017)	637	- PY2017 Pathways Group Home Emergency Generator	\$586.00
(2017)	638	- PY2017 CDBG Planning and Administration	\$2,620.22

In addition, if there are any funds that have not been reprogrammed, please do so now. Please monitor those activities that are still identified as “open.” These activities may influence the Town’s ratio at the end of its program year. As soon as these activities are completed, enter the Town’s accomplishments, and mark the activity completed. Please ensure that actions are taken (i.e. drawing funds, reprogramming) to prevent them from appearing in future At-Risk Activity Reports.

## **General**

In Grant Year 2017, the Town of Greenwich again expended 100% of its CDBG funds on projects or activities that benefited low- and moderate-income individuals, exceeding the 70% requirement. Expenditures for public service activities were 3.40%, below the 15% statutory cap, and expenditures for planning and administration activities were 0.00%, below the 20% statutory cap of the annual grant.

On November 2, 2017, Greenwich did not meet the 1.50 standard determined by HUD. The Department uses the regulation 24 CFR 570.902, to determine if communities are delivering program activities to residents in a timely manner. By regulation, the grant recipient must have no more than 1.50 years of unexpended grant funds in its line of credit 60 days before the end of the program year. The Town's expenditure ratio was 2.21 as of the November 2, 2017 test date,

The Town of Greenwich received a letter dated November 30, 2017 for Failure to Carry Out in the CDBG Program in a Timely Manner. The City was informed that they had 12 months, until their next 60-day test, to reach the 1.5 timeliness standard. Failure to meet the timeliness requirement a second time may cause HUD to reduce the next grant by 100% of the amount in excess of the 1.5 standard, with an exception for any grantee where HUD determines that the timeliness resulted from factors beyond the grantee's control. The City should monitor its expenditure rate by running an IDIS PR56 report, so they will not lose any CDBG funds. For a grantee with a January 1 program year start date and its current allocation is not obligated in IDIS by the test date, you can calculate the ratio "by hand", (adjusted LOC (not incl. 2018 grant) divided by 2017 CDBG Grant equals Adjusted Ratio).

## **Public Access**

If the Town wishes to submit comments on this letter, please do so within 30 days of the date of this letter. HUD will consider any comments submitted, and may revise the content of the letter or attach comments received from the Town of Greenwich. If HUD does not hear from the Town, an assumption will be made that Greenwich concurs and has no objections to HUD's letter. After the 30 days have expired, this letter must be readily available to the public. There are several ways to make it available to the public. The Town can assist HUD in this regard by sharing the letter with the media: with a mailing list of interested persons; with members of the Town's advisory committee; or with those who attended hearings or meetings. HUD will make this information available to the public upon request.

## **Conclusion**

HUD is rating Connecticut's grantees overall performance in carrying out their programs as either satisfactory or unsatisfactory. This determination is based upon information available to this office, and does not reflect a comprehensive evaluation of specific activities. HUD has determined the Town of Greenwich's performance to be satisfactory. HUD further deems that Greenwich has the continuing capacity to administer its program.

If the Town has any questions or would like to discuss any of these issues further, please do not hesitate to contact me or Yvonne Candelario-Morgan, Senior Community Planning and Development Representative, at (860) 240-9710.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alanna Cavanagh Kabel', written in a cursive style.

Alanna Cavanagh Kabel  
Director  
Community Planning and Development