



U.S. Department of Housing and Urban Development

Hartford Field Office
Office of Community Planning & Development
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December 1, 2021

Mr. Tyler Fairbairn
CDBG Administrator
Town of Greenwich
101 Field Point Road
Greenwich, CT 06830

Dear Mr. Fairbairn:

SUBJECT: Consolidated End-of-Year Review – Program Year 2020

The Town of Greenwich received \$827,693.00 in Community Development Block Grant (CDBG) and \$843,568.00 in CARES Act (CDBG-CV) funds in Program Year 2020, the year covered by this report. This is the Department's assessment of 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 received 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 its accomplishments in meeting key departmental objectives. This 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. HUD congratulates Greenwich on the community's many accomplishments during this past year regarding the achievement of departmental objectives.

Noteworthy Accomplishments

During the Program Year 2020, the Town of Greenwich completed two housing activities allocated funding in PY2020 – the renovation of the kitchen at Abilis’ 52 Glenville Road group home for individuals with mental and developmental disabilities and the flooring replacement at Parsonage Cottage, serving 40 elderly, LMI residents. A total of three activities that serve homeless individuals or families were provided Program Year 2020 CDBG funds. Of the three activities, two were public service programs and one was a public facility project. For the public service activities, Kids in Crisis received \$10,000 to support its emergency nursery services for homeless children (or those at risk of homelessness), and Pacific House received \$5,000 to support the Emergency Meals Program at its Stamford emergency shelter. For public facility projects, Inspirica received a grant for \$24,000 to replace the boiler at its 24 Woodland Place building – a development in Stamford for those who are transitioning out of homelessness and require supportive services. Pacific House is the only 24/7 homeless facility in the area and offers referrals and services to help homeless individuals transition out of its shelter. The Town provided \$123,793 in PY2020 CDBG funds to support the Housing Authority of the Town of Greenwich and its Wilbur Peck Walkways/Breezeways project. The intention of this project is to ensure that residents have continued access to decent, safe, and affordable housing.

The Town collaborated with various public and private housing, health and social service agencies and organizations whose programs benefit low- and moderate-income residents. The planned activities for PY2020 were carried out by 25 unique community and area service providers. Through required attendance at public hearing presentations, the Town brings applicants/providers together, and assesses applications to reduce duplication and promote coordination. Several CDBG-CV CARES Act recipients partnered during the COVID-19 outbreak to ensure maximum service coverage to those in need. The Town of Greenwich provided \$487,810.00 to prepare, respond and prevent COVID-19.

General and Financial

On May 2, 2021, Greenwich met their timeliness standard in not exceeding 1.50 times its current year grant. The Department adheres to 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 1.45% as of the May 2, 2021 test date. The Town’s current ratio is 2.25% (adjusted ratio for program income). The Town is strongly encouraged to monitor its expenditure rate by running an IDIS PR56 report.

In Grant Year 2020, Greenwich expended 98.9% of its CDBG funds on projects or activities that benefited low- and moderate-income individuals, exceeding the 70% requirement. The Town has currently expended 100% of its CDBG-CV funds on projects or activities that benefit low-and-moderate-income individuals. Expenditures for planning and administration activities were below the 20% expenditure cap (17.97%). Additionally, expenditures for public services were (14.78%). Greenwich is an “exception community” who may exceed the 15% public service cap.

The Town’s federal single audit for the period ending June 30, 2021, was not submitted in

a timely manner to the Federal Audit Clearinghouse (FAC).

Fair Housing and Equal Opportunity

A primary goal of the Department is to reduce housing discrimination, affirmatively further fair housing through CPD programs and promote diverse, inclusive communities. To that end, we encourage your community to take all measures necessary to ensure compliance with the Fair Housing requirements associated with these funds. A copy of your CAPER was provided to the Office of Fair Housing and Equal Opportunity for review. Advisory comments from that review are enclosed with this letter:

FHEO has reviewed this CAPER for the Town of Greenwich (“the Town”) for the Program Year 2020 (7/1/2020-6/30/2021) and has found that the CAPER does not meaningfully address fair housing or adequately describe measures to promote fair housing choice through the HUD funded activities... While the town asserts intent to create affordable housing opportunities, this is not evident by the town’s actions this past year... The town did not provide any substantive information on how it will alleviate and address these issues beyond providing “input” and “comments” to the local PHA and housing developers... While FHEO understands the town has obstacles with attaining affordable housing, fair housing is a matter of concern. Greenwich needs to highlight barriers that prevent equal housing choice, not barriers to affordable housing. Affordability is not a barrier to fair housing... The town of Greenwich does not provide much substantive information on housing activities. This is of concern. CAPERs must state, with specificity, the barriers to fair housing choice faced by residents of the town, and the actions to alleviate these barriers. Acknowledgement of barriers does not adequately address the steps Greenwich must take to dismantle these barriers.

- 1. FHEO would like Greenwich to make valid efforts to complete the rehabilitation for rental and homeownership units as described in this year’s CAPER to provide adequate housing to all members of federal protected classes.*
- 2. FHEO would like Greenwich to describe substantive actions to address the barriers to equal housing choice. These actions should be reflected in the upcoming CAPER and all subsequent submissions.*
- 3. FHEO would like for Greenwich to increase efforts to address opposition to affordable housing through fair housing outreach and education initiatives.*

If you have any questions regarding the above comments, please contact the Boston Regional Office of FHEO by phone at (617) 994-8300 or (800) 827-5005.

Public Access

If the Town wishes to submit comments regarding the substance of this communication, please do so within 30 days of the date of this letter. HUD will consider any comments submitted and may revise the content of HUD’s letter or attach comments received from the Town. If the Department does not hear from the Town, HUD will assume that the Town concurs and has no

objections to HUD's letter. After 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 Department's letter with the media, with a mailing list of interested persons, with members of your advisory committee, or with those who attended hearings or meetings. HUD will make this information available to the public upon request.

Conclusion

The Department rates our Connecticut 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. The Town of Greenwich performance has been determined to be satisfactory. HUD further deems that Greenwich has the continuing capacity to administer its programs.

If the Town has questions or would like to discuss any of the issue reviewed in this letter, please do not hesitate to call me or Brenda Turner, Community Planning and Development Representative, at (860)240-9733.

Sincerely,

Alanna Cavanagh Kabel

Alanna Cavanagh Kabel
Director
Community Planning & Development

Cc: Fred Camillo, First Selectman



TOWN OF GREENWICH

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Greenwich, CT 06830

Office of
Community Development
(203) 622-3791
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Tyler Fairbairn
Community Development Administrator

December 8, 2021

Alanna C. Kabel
Community Planning and Development Director
U.S. Department of Housing and Urban Development
Hartford Field Office
20 Church Street, 10th Floor
Hartford, CT 06103

VIA EMAIL

Re: Town of Greenwich Program Year 2020 Consolidated Annual Performance Evaluation Review

Dear Ms. Kabel:

The Town of Greenwich (the "Town") recently received your December 1, 2021 letter assessing its use of Program Year 2020 ("PY2020") Community Development Block Grant ("CDBG") funding in carrying out the goals and objectives outlined in its Consolidated Plan and PY2020 Annual Action Plan as detailed in its year-end Consolidated Annual Performance Evaluation Review ("CAPER"). As always, the Town appreciates the feedback and welcomes the opportunity to continue to make improvements to its CDBG Program.

Per page three of your letter, the Town would like to take this opportunity to comment on one portion of the CAPER assessment. This is the first year that the Community Development Office recalls advisory comments from the Office of Fair Housing and Equal Opportunity ("FHEO") being included in the CAPER assessment review, and I wanted to thank you, Brenda Turner and Michelle Johnson from FHEO for taking the time to speak with me via TEAMS on Monday, December 6, 2021. The Town appreciates Ms. Johnson's clarification of FHEO's comments on its PY2020 CAPER, in which she noted that they are formatted to fit a template, and that the Town is doing commendable work toward addressing fair housing choice. Because of the technical limitations of the Integrated Disbursement and Information System used to submit the CAPER, the Town will, moving forward, be sure to include an addendum to its CAPER submissions that presents a more complete narrative of the work it is doing to address fair housing choice both through its CDBG Program and otherwise.

As noted on the December 6th TEAMS call, the Town understands that the role of FHEO in reviewing its CAPER submissions is advisory, and thanks the Hartford Field Office for highlighting the Town's satisfactory designation in the CAPER assessment letter, as well as its adherence to funding designation requirements and compliance with the timely expenditure deadline. The Town of Greenwich looks forward to continuing our successful partnership with the Hartford Field Office in order to best deliver critical services to the most vulnerable members of the community. If you have any questions regarding this response, please feel free to contact me at (203) 622-3796, or by email at tyler.fairbairn@greenwichct.org.

Respectfully,



Tyler Fairbairn

cc: Brenda Turner, HUD Hartford Field Office
Fred Camillo, First Selectman
Ben Brayan, Town Administrator & COO