

**CONSOLIDATED ANNUAL PERFORMANCE
AND
EVALUATION REPORT
“CAPER”**

**MILLCREEK TOWNSHIP, PA
HUD CDBG PROGRAM**

**YEAR 2 (FY 2019)
Of
FIVE-YEAR CONSOLIDATED PLAN
(FY’s 2018, 2019, 2020, 2021 & 2022)**

**Prepared for:
Millcreek Township Supervisors
3608 West 26th Street
Erie, PA 16506**

**Prepared by:
Erie County Department of Planning
150 East Front Street, Suite 300
Erie, Pennsylvania 16507**

**Comment Period:
February 13, 2021 through February 27, 2021**

TABLE OF CONTENTS

SECTIONS	Page Numbers
Cover Page	1
Table of Contents	2
CR-05 / Goals and Outcomes	3-6
CR-10 / Racial and Ethnic Composition of Families Assisted	7
CR -15 / Resources and Investments, including Leveraging	8-9
CR -20 / Affordable Housing	10
CR -25 / Homeless and Other Special Needs	11-12
CR -30 / Public Housing	13
CR -35 / Other Actions	14-15
CR – 40 / Monitoring	16
CR – 45 / CDBG Potential Changes	17

Attachment A: CAPER Public Notice

PR-26 CDBG Financial Summary Report

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

This document represents Millcreek Township's "Second Year" CAPER of its Five Year Consolidated Plan. It provides an assessment of the Township's accomplishments over the past fiscal year (*July 1, 2019 to June 30, 2020*) utilizing its FY 2019 funds; prior year CDBG monies which were not expended by the time of last year's CAPER; and other monies to address housing and non-housing community development needs as identified in the 2019 Annual Action Plan (AAP) and Five Year CP. Activities proposed and/or implemented during the reporting period July 1, 2019 to June 30, 2020 is as follows:

FY 2018

Sidewalk Accessibility Project/Phase VII - Remove, design, and replace approximately 140 curb-cut ramps at various locations throughout the Township pursuant to the Consent Decree of 2011 mandating the replacement of up to 1,400 existing ramps by 2020. [\$176,430.00 ('18) + \$487.40 Residual '17 funds]

STATUS: COMPLETED – 151 curb-cut ramps constructed. (\$37,420 in residual funds to be put towards the FY 2019 funded Phase VIII Sidewalk Accessibility Project)

Regional Senior Center Operational Support Project - Underwrite salary and fringe benefit expenses of "LifeWorks Erie" employees who will provide health screenings, health education/workshops, and flu vaccinations for senior citizens in Millcreek. [\$10,000]

STATUS: COMPLETED - 2,723 persons assisted -- 351 persons received health screenings; 284 persons attended health related talks; flu shots administered to 1,923 individuals, and 165 persons attended "Matter of Balance" workshops. (\$4,166.69 drawn down/expended during reporting period)

Administration - \$30,000

STATUS: COMPLETED – All funds drawn down/expended.

FY 2019

Sidewalk Accessibility Project/Phase VIII - Remove, design, and replace approximately 150 curb-cut ramps at various locations throughout the Township pursuant to the Consent Decree of 2011 mandating the replacement of up to 1,400 existing ramps by 2020. [\$215,561.00]

STATUS: Construction contract executed June 9, 2020. Notice to proceed issued June 22, 2020 with all work to be completed by August 31, 2020. The first draw down of funds was August 10, 2020.

Administration - \$29,000 –

STATUS: COMPLETED – All funds drawn down/expended.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected Program Year	Actual – Program Year	Percent Complete
2018 Goal - Infrastructure: Sewer Improvements	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	50	0	0.00%	0	0	0%
2018 Goal - Infrastructure: Sidewalks	Non-Housing Community Development	CDBG \$176,430	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	6297	6297	100.00%	6297	6297	100.00%
2018 Goal - Infrastructure: Streets	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	90	0	0.00%	0	0	0%
2018 Goal - Public Services: Senior Services	Non-Homeless Special Needs	CDBG \$10,000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2723	2723	100.00%	2723	2723	100.00%
2018 Goal - Public Facilities: Park Improvements	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1545	0	0.00%	0	0	0%

2018 Goal - Public Services: Fair Housing	Fair Housing		Other	Other	1	1	100.00%	0	0	0%
2018 Goal - Residential Rehabilitation	Affordable Housing Non-Homeless Special Needs		Homeowner Housing Rehabilitated	Household Housing Unit	15	0	0.00%	0	0	0%
2018 Goal - Planning and Administration	Planning and Administration	CDBG \$30,000	Other	Other	1	1	100.00%	1	1	100%
2019 Goal - Infrastructure: Sewer Improvements	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	50	0	0.00%	0	0	0%
2019 Goal - Infrastructure: Sidewalks	Non-Housing Community Development	CDBG \$215,561	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	6297	6297	0.00%	6297	6297	100%
2019 Goal - Infrastructure: Streets	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	90	0	0.00%	0	0	0%
2019 Goal - Public Facilities: Park Improvements	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1545	0	0.00%	0	0	0%

2019 Goal - Public Services: Fair Housing	Fair Housing		Other	Other	1	0	0.00%	0	0	0%
2019 Goal - Public Services: Senior Services	Non-Homeless Special Needs		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		0	0	0%
2019 Goal - Residential Rehabilitation	Affordable Housing Non-Homeless Special Needs		Homeowner Housing Rehabilitated	Household Housing Unit	15	0	0.00%	0	0	0%
2019 Goal - Planning and Administration	Planning and Administration	CDBG \$29,000	Other	Other	1	1	100.00%	1	1	100%

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

Beginning with Fiscal Year 2012 and continuing through FY 2019, the majority of the Township's CDBG funds have been used to address its Number 1 need/priority; this being the removal, design, and replacement of curb-cut ramps for handicapped accessibility. Pursuant to a Consent Decree Order of 2011, the Township is mandated to replace up to 1,400 existing ramps by 2022. The Township anticipates it will need to use one more year of funding (FY 2020) to meet its obligation after which it can begin to address other needs identified in the CP.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

	CDBG
White	6,023
Black or African American	157
Asian	99
American Indian or American Native	18
Native Hawaiian or Other Pacific Islander	0
Total	6,297
Hispanic	139
Not Hispanic	6,158

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

FY 2018 CDBG funds in the amount of \$176,430 plus \$487.40 in residual FY 2017 monies provided for the replacement of 151 curb-cut ramps to provide accessibility for disabled persons who are a clientele "presumed" by HUD to be LMI. According to the most current census information, there are 6,297 persons with a disability in Millcreek Township.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	244,561	29,000

Table 3 - Resources Made Available

Narrative

\$29,000 of FY 2019 allocation of \$244,561 was drawn down/expended during the period July 1, 2019 through June 30, 2020. The remaining \$215,561 which provided for the removal, design, and replacement of 150+ curb-cut ramps was drawn down/expended by November 16, 2020.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
	100%	100%	

Table 4 – Identify the geographic distribution and location of investments

Narrative

The geographic distribution and location of investment was community-wide.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

- No CDBG monies nor any other federal funds were used to leverage additional resources.
- No publically owned land or property located within Millcreek Township was used to address any identified needs in the Five Year CP.

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	0	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	0	0

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	0	0
Number of households supported through Acquisition of Existing Units	0	0
Total	0	0

Table 6 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

No FY 2019 CDBG funds were set aside for housing activities and/or affordable housing opportunities. As mentioned throughout this CAPER, the Number 1 need/priority for which all funds were allocated (less administration) is to remove, design, and replace existing curb-cut ramps pursuant to the 2011 Consent Decree.

Discuss how these outcomes will impact future annual action plans.

Millcreek Township will continue to allocate its CDBG allocations to replace curb-cut ramps until full compliance is met with the 2011 Consent Decree which mandates that up to 1,400 ramps be replaced by 2022.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	0	0
Low-income	0	0
Moderate-income	0	0
Total	0	0

Table 7 – Number of Households Served

Narrative Information

Not applicable.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Most if not all social service agencies that serve Millcreek Township residents are located outside of the township, predominantly in the City of Erie. No homeless or housing providers are located in Millcreek. Additionally, there is no information available identifying Millcreek Township's homeless population or subpopulations. Consequently, the nature and extent of homelessness in Millcreek is unknown. The Township supports the efforts of the City of Erie and County CoC to provide homeless services and emergency, transitional, and permanent housing for homeless individuals and families, including veterans, those with special needs, persons with disabilities, HIV/AIDS, and victims of domestic violence.

Addressing the emergency shelter and transitional housing needs of homeless persons

Erie County Care Management (ECCM) implements a coordinated entry system for all homeless or near homeless individuals and families to have a single touch point through which to access the area's suite of shelters and supportive services. This number is 814-SHELTER. Because this access point is available through a single phone number, ECCM can now more effectively spread the word about the new system among homeless populations. Much of the information regarding resources available to the homeless travels by word of mouth, so it is critical to ensure that awareness of how to access coordinated entry is widespread. Through the new system, ECCM is responsible for screening all individuals who enter the homeless system. The screening allows administrators to assess the needs of each individual or family and direct them to a facility that both fits their needs and has capacity. After an assessment is completed by coordinated entry staff, the clients are then referred to appropriate housing interventions. In Erie County, the assessment used is VI-SPDAT. Service and shelter providers are engaged in an ongoing effort to help ECCM understand the unique programs that they offer so that coordinated entry administrators are better able to match the homeless to programs that fit their needs. Coordinated Entry along with housing providers utilizes HMIS.

In addition to improving the coordination and use of resources as described above, shelter providers that serve Erie County are dedicated to providing sufficient space to accommodate those in need of emergency shelter. A seasonal shelter is provided at local churches and other community partner sites.

The County and some of its nonprofit shelter providers have moved away from a transitional housing model and towards a model of permanent housing and rapid rehousing, using national research to affirm that permanent housing is the best way to end homelessness. Transitional housing continues to be provided for female victims of domestic violence and their families, as well as for veterans.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services,

employment, education, or youth needs

While the Township does not intend to undertake activities specifically targeted toward preventing homelessness, it will continue to rely on and support the work of local agencies working toward this goal.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The ultimate goal of area shelter providers is to help the homeless secure permanent housing and minimize the amount of time spent by individuals and families in the shelter system. The coordination of a broad range of social service providers helps to ensure that the homeless and formerly homeless receive the support necessary to become and remain stably housed. The Township will continue to work with housing and social service providers to meet the housing needs of homeless persons.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

Public housing in the Township consists of a three-story elderly apartment complex known as the Gerald S. Salsbury Building. The building is located at 4004 Pacific Avenue and is owned and managed by the Erie County Housing Authority (ECHA). The facility was constructed in 1981 under the Public Housing Program. The complex is comprised of 63 one-bedroom units and 2 two-bedroom units, all of which are occupied.

In addition to conventional public housing, the Housing Authority administers approximately 861 Section 8 vouchers throughout the County (excluding the City of Erie), approximately 258 of which were being utilized in the Millcreek as of January 2020. Approximately, one-third of these vouchers are being used at the following apartment complexes: The Reserve at Millcreek (42 vouchers); Paul J. Martin Complex (28 vouchers); Cider Mill Apartments (8 vouchers); and Tanglewood Apartments (4 vouchers).

The Housing Authority annually receives Capital Funds from HUD to undertake improvements at its public housing developments. No FY 2019 CDBG funding is being allocated to address the needs of public housing.

Actions taken to encourage public housing residents to become more involved in management and participate in homeownership

The Housing Authority encourages tenants to attend the annual “Tenant Meetings” held in late spring early summer. These meetings are held so that tenants can inform the Authority of their concerns and wishes for upgrades and repairs to the buildings. These Meetings are held at each of the public housing facilities to make it easier for the tenants to attend with no travel involved.

Actions taken to provide assistance to troubled PHAs

NOT applicable. The ECHA is not designated as a troubled agency.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

Actions undertaken include:

1. The Township has a draft rental registration program and has received a grant from PA DCED for implementation of administration software that could support such a program. There is currently no proposed implementation date but work on the program progresses.
2. Mackin Engineering, Inc. has been hired by the Township to update the Zoning Code and SALDO. Work on the zoning code is ongoing and minimum set-asides will be considered at the appropriate time.
3. HUD sets the Fair Market Rent every year for Erie County. The Authority's payment standards are set based on the fair market rents established by HUD. HUD allows payments standards to be between 90% - 110% of the fair market rent without HUD approval. The ECHA uses 110% of the fair market rent for its payment standard for any Section 8 units rented in Millcreek as a way of encouraging more landlords in the Township to participate in the program.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

An underserved need of the Township is LMI single family housing rehabilitation along with home modifications for disabled individuals. Millcreek is hopeful that it will be able to commit some of its 4th and/or 5th year CDBG funding for these activities once it completes the multi-year/multi-phase program of the curb-cut removal/ replacement. This could change however if the Township is mandated to remove and replace existing sidewalks for ADA accessibility.

In the interim, the Township will continue to partner with the Erie County Housing Authority which provides weatherization assistance to residents of Erie County (excluding the Erie City) including Millcreek Township.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

No FY 2019 CDBG funds were set aside for single family housing rehabilitation. In the event that funding is made available in the future, each unit built before 1978 would be tested for the presence of lead-based paint, and if found, surfaces would be removed or material encapsulated to prevent exposure. Upon conclusion of the rehabilitation work, the housing unit would have to pass a lead clearance test.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

According to 2017 census estimates, 6.7% of all families in Millcreek Township live below the poverty level compared to 3.9% in 2010. Unfortunately the Township has very little control over the factors that cause poverty and very little it can do on its own to address the problem. What is needed most to break the

cycle of poverty in Millcreek and Erie County as a whole is equal access to quality education starting in early childhood and the development of, and access to, job training and good paying jobs as well as affordable health care. This can only be accomplished by a community/regional effort.

One group working to address the problem is “Erie Together”, a collaboration of 3 agencies - the Greater Erie Community Action Committee [GECAC], United Way of Erie County, and Mercyhurst University which was formed in 2009 to help better align local resources to prevent and reduce poverty which will ultimately help strengthen the area’s local economies. Specific issues that Erie Together teams are currently working on include: 1) Early Childhood Readiness and Success; 2) Aligning Education to Careers; 3) Individual and Family Stability; and 4) Balancing Economic and Workforce Development. The Township will need to continue to support and encourage the efforts of groups like “Erie Together” that are working to reduce the causes of poverty in the area.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

No changes were taken nor are anticipated in the present institutional structure.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

Millcreek Township continues to actively work with regional housing and social service providers to identify opportunities to enhance coordination between the Township and such providers. Millcreek accomplishes this through regular communication between Township representatives and housing and service providers that address the needs of its residents.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

The Erie County Council of Governments (COG) sponsored a "Fair Housing Workshop for Municipal Officials" on Thursday, November 14, 2019 from 10:00 to 12 noon at the Millcreek Township Municipal Building located at 3608 West 26th Street in Millcreek. The presenter was Jaime Milligan, Esq. Director of Housing Services at Southwestern PA Legal Services. Topics discussed included protected classes with emphasis on sexual harassment, disability, reasonable accommodations/modifications, assistance animals, and familial status; liable entities (i.e. owners, landlords, lenders, realtors); prohibited practices; and statute of limitations. A total of 18 persons attended including representatives from the County's four (4) "OBO's", the City of Corry, as well representatives from Erie County's two (2) direct HUD entitlements -- City of Erie and Millcreek Township.

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The Erie County Department of Planning (ECDP) is responsible for the administration of the Township's CDBG program including the monitoring of activities for compliance with applicable federal requirements. This monitoring includes, but is not limited to the following:

- (1) Prior to the inclusion of an activity in the Annual Action Plan, the ECDP will ensure and document that the proposed undertaking is: (1) an "Eligible" Activity;
- (2) (2) meets a National Objective of the program; and (3) addresses a goal as identified in the Consolidated Plan/Strategic Plan
- (3) Each activity will be evaluated for its effects on the human environment and documented in an Environmental Review Record (ERR)
- (4) Ensure compliance with applicable procurement rules and regulations when purchasing services, supplies, material, or equipment.
- (5) All construction projects will be checked for compliance with applicable federal labor standards requirements
- (6) Ensure that the program will be conducted in compliance with all applicable civil rights laws and regulations and with all applicable Equal Employment Opportunity requirements
- (7) Establish tracking and data collection systems to support the preparation and submittal of a variety of compliance reports to HUD throughout each program year as required by the CDBG regulations and other federal requirements

In addition to the above, the ECDP will monitor all open CDBG activities and will conduct desk audits and/or on-site monitoring reviews of activities undertaken by sub-recipients to ensure that sub-recipients comply with all regulations and requirements governing the administrative, programmatic and financial management of CDBG funds. This an ongoing process beginning with the Eligibility Review and concluding with Grant Closeout. In conducting a monitoring review the ECDP will primarily rely on a *Desk Audit* which will concentrate on the following: 1) Eligibility review; 2) Meeting National Objective; 3) Monthly Performance Reports; 4) Reimbursement Requests; 5) Timeliness, and 6) Audit review. *On-Site monitoring/visits* will be conducted on as needed basis and more frequently for underperforming or new sub-recipients; existing sub-recipients carrying out a new program; or when there has been a significant change in staffing at the agency of an existing sub-recipient.

With regard to MBE/WBE outreach, the Township has adopted a policy to promote MBE/WBE participation in projects that receive CDBG funding. This policy includes establishing "Minimum Participation Levels" for utilization of MBE/WBE enterprises in the bidding and awarding of contracts.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

A Notice was published in the Erie Times News on February 12, 2021 informing the public that the "CAPER" is available for review/comment from February 13 to February 27, 2021.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

No changes are anticipated in the Township's CDBG program objectives until at least 2021 when it will have completed the removal/replacement of nearly 1,400 curb-cut ramps pursuant to the 2011 Consent Decree.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No