

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

**MILLCREEK TOWNSHIP, PA
HUD CDBG PROGRAM**

**YEAR 3 (FY 2015)
of
FIVE-YEAR CONSOLIDATED PLAN
(FY's 2013, 2014, 2015, 2016 & 2017)**

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THIRD PROGRAM YEAR (2015) "CAPER"

MILLCREEK TOWNSHIP, PA

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 Third Year "CAPER" (2015) of its Five Year Consolidated Plan (CP) which encompasses years 2013, 2014, 2015, 2016 and 2017. The CAPER provides an assessment of the Township's accomplishments over the past fiscal year (July 1, 2015 to June 30, 2016) using its CDBG funds and other monies in addressing its housing and non-housing community development needs as identified in the CP.

Millcreek Township received \$215,875 in FY 2015 CDBG funding. It does not receive HOME or ESG monies. The projects and their status as of the submission of this CAPER are as follows:

Project #1: Sidewalk Accessibility Project- Phase IV

Description: Removal, design and replacement of approximately 140 curb-cut ramps at various locations throughout the Township.

Budget: \$171,675 (Note: FY 2013 monies totaling \$11,000 supplemented the FY 2015 monies)

Status: COMPLETED –CDBG funds provided for the installation of 170 handicapped accessible curb-cut ramps divided among 35 locations along 19 roads in the Township.

Project #2: Regional Senior Center Operational Support Project

Description: Provide funding for the Erie Center on Health and Aging Inc. (dba LifeWorks Erie) to support continued operations of the Regional Senior Center.

Budget: \$10,000

Status: COMPLETED - CDBG funds were used to help underwrite expenses related to the salaries and fringe benefits of senior center staff directly responsible for programming and service delivery. Services provided consisted of health screenings, flu/pneumonia vaccinations, podiatry services, and health education workshops.

Project #3: Salisbury Building Automatic Door Operator Installation Project

Description: Undertake improvements to entrance way at the G.S. Salisbury Building to assist elderly tenants safely and easily enter and exit the building.

Budget: \$3,200

Status: COMPLETED – CDBG funds provided for the installation of an automatic door operator on the main entrance door of the G.S. Salisbury Building which is a three-story elderly apartment complex consisting of 65 units owned and managed by the Erie County Housing Authority.

Project #4: Administration

Description: General management, oversight and coordination of the Township's FY 2015 CDBG program. These services are being provided by the Erie County Department of Planning.

Budget: \$31,000

Status: ONGOING - Services continue to be provided by the ECDP until all projects are completed and funds 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.)

During the five year period (2013-2017) covered by the CP, Millcreek Township proposed to undertake the following activities to address its housing and non-housing community development needs. Below is a summary of the needs, goals and accomplishments to date.

HOUSING NEEDS

Need: Housing improvements including single family and/or rental housing rehabilitation as well as home modifications for handicapped persons.

Goal: Make improvements to five (5) units.

Accomplishments: No homes have been rehabilitated/modified. Consideration will be given to allocating FY 2017 CDBG funding for this effort.

Accomplishments/Other- Public Housing Improvements: FY 2015 CDBG funds in the amount of \$3,200 provided for the installation of an automatic door operator on the main interior entrance door of the Gerald S. Salsbury Building which is a three-story elderly housing complex owned and managed by the Erie County Housing Authority.

Need: Support efforts to expand the supply of assisted rental housing.

Goal: Provide funding to undertake a planning study to determine the potential for affordable housing developments for seniors and special needs populations.

Accomplishments:

The Township allocated \$10,095 in FY 2013 CDBG funds for H.A.N.D.S to undertake a planning study the date from which would be used to complete a Low Income Housing Tax Credit (LIHTC) application through the PA Housing Finance Agency (PHFA) for two (2) affordable housing developments – one for senior citizens and the other for special needs populations. The project was deleted as it became apparent that the funding was inadequate to undertake a study of such magnitude. The grant monies were subsequently transferred to the Phase II Sidewalk Accessibility Project

The Township allocated \$11,000 in FY 2014 CDBG funds for H.A.N.D.S to undertake the same effort as noted above, with the exception that the study would just focus on a senior development. The project was deleted as H.A.N.D.S was unable to acquire a site/building for the potential development. The grant monies were subsequently reprogrammed to supplement the FY 2015 CDBG funded Phase IV Sidewalk Accessibility Project.

A vacant County building in Millcreek Township looks promising as a potential site for development. Given this situation and the continued need for affordable rental housing units, the Township decided to allocate FY 2016 funds in the amount of \$11,000 for H.A.N.D.S to once again undertake the planning study.

NON-HOUSING COMMUNITY DEVELOPMENT NEEDS

Need: Infrastructure - - Sidewalk Accessibility Improvements

Goal: Construct curb-ramps for handicapped accessibility. The Township is under a 2011 Consent Decree to install approximately 1,300 curb ramps by 2022.

Accomplishments:

- One hundred forty-eight (148) ramps were installed in the summer of 2014 utilizing \$151,663.69 in FY 2013 CDBG funds.
- One hundred fifty-four (154) ramps were installed the summer of 2015 utilizing \$29,818.31 in residual FY 2013 monies and \$157,173 in FY 2014 funds.
- This summer (2016) 170 ramps were installed utilizing \$171,675 in FY 2015 funds plus \$11,000 in FY 2014 reprogrammed monies from a deleted project.
- The Township will be providing \$177,216 in FY 2016 CDBG funding for the installation of approximately 140 ramps.

Need: Infrastructure - -Flood Drain Improvements

Goal: Construct one (1) flood drainage facility.

Accomplishments: There has been no activity regarding this goal nor will there be during the remainder of the Five Year CP. The Township has not identified /acquired a site for construction of a flood detention basin.

Need: Infrastructure - - Water/Sewer Improvements

Goal: Replace or extend one (1) water line and or/sanitary sewer line.

Accomplishments: There has been no activity regarding this goal nor will there be during the remainder of the Five Year CP. Also, the Township is no longer in the business of providing water service as its water system and assets have been sold to the Erie Water Works.

Need: Infrastructure - - Street and Sidewalk Improvements

Goal: Reconstruct one (1) street and replace existing sidewalk.

Accomplishments: There has been no activity regarding this goal. Consideration was given to using CDBG funds to make additional road/sidewalk improvements in the Highland Park area as was done with FY 2009, 2010 and 2011 CDBG funds, however, according to the most current Low/Moderate Income Summary Data (LMISD), the area no longer meets the requisite *37.1% LMI threshold*.

Need: Public Facilities - - Recreation Improvements

Goal: Improve one (1) park.

Accomplishments: There has been no activity regarding this goal. Consideration was given to using CDBG funds to purchase and install playground equipment and construct sidewalks at Wander Park, but it is unlikely this will occur during the remainder of the Five Year CP.

Need: Public Facilities - - Senior Center

Goal: Assist in the establishment of a new senior center.

Accomplishments: The Township allocated \$15,000 in FY 2014 CDBG funding to MECCA, the administrative agent of a new senior center in the Township known as the J.O.Y. Center. The funds were to be used to help pay for additional employee hours so that the Center could expand its days of operation from 3 to 5 days a week. The Center ended up ceasing operations and the grant funds were transferred to the multi-year funded Phase III Sidewalk Accessibility Project.

Need: Public Services - - Senior Services

Goal: Assist the Erie Center on Health and Aging (*dba LifeWorks Erie*) by providing CDBG funding to the Regional Senior Center help offset operating costs.

Accomplishments: FY 2014 and FY 2015 CDBG funds in the amount of \$9,000 and \$10,000 respectively was provided to the Erie Center On Health and Aging to help the Regional Senior Center offset expenses related to salaries and fringe benefits of senior center staff directly responsible for programming and service delivery. Services provided consisted of health screenings, flu/pneumonia vaccinations, podiatry services, and health education workshops. The Township will be providing \$10,000 in FY 2016 CDBG funding to the ECHA to continue with this effort.

Need: Affirmatively Further Fair Housing

Goal: Address impediments to fair housing as identified in the Fair Housing Analysis

Accomplishments:

- Erie County completed a Regional Analysis of Impediments to Fair Housing Choice in March 2015. The Township approved the A/I, including a Fair Housing Action Plan, by means of a Resolution (2015-R-23) on November 10, 2015.
- FY 2016 CDBG funds in the amount of \$5,804 will be provided to the Erie County Human Relations Commission to hire a qualified, independent consultant to test the rental housing market for possible discrimination.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Expected – Program Year	Actual – Program Year	Percent Complete
Housing Rehabilitation	Housing	CDBG /\$0	Housing	Houses Rehabilitated	5	0	2017	-	0%
Affordable Housing	Planning Projects	CDBG /\$11,000	Other	Plans Completed	1	2013	2016	-	0%
Infrastructure: Sidewalk Accessibility Project- Phase II	Non-Housing Community Development	CDBG/ \$151,663.69	Public Facility or Infrastructure Activities other than LMI Housing Benefit	Ramps Constructed	100+	148	2013	2013	100%
Infrastructure: Sidewalk Accessibility Project- Phase III	Non-Housing Community Development	CDBG/ \$157,173/'14 CDBG/ \$29,818.31/'13	Public Facility or Infrastructure Activities other than LMI Housing Benefit	Ramps Constructed	100+	154	2014	2014	100%
Infrastructure: Sidewalk Accessibility Project- Phase IV	Non-Housing Community Development	CDBG /\$171,675/'15 CDBG/\$11,000/'14	Public Facility or Infrastructure Activities other than LMI Housing Benefit	Ramps Constructed	100+	170	2015	2015	100%
Infrastructure: Flood Drain Improvements	Non-Housing Community Development	CDBG /\$0	Public Facility or Infrastructure Activities other than LMI Housing Benefit	Other	1	0	-	-	0%
Infrastructure: Water/Sewer Improvements	Non-Housing Community Development	CDBG /\$0	Public Facility or Infrastructure Activities other than LMI Housing Benefit	Other	1	0	-	-	0%
Infrastructure: Streets and Sidewalks	Non-Housing Community Development	CDBG /\$0	Public Facility or Infrastructure Activities other than LMI Housing Benefit	Other	2	0	-	-	0%
Public Facilities: Park Improvements	Non-Housing Community Development	CDBG /\$0	Public Facility or Infrastructure Activities other than LMI Housing Benefit	Other	1	0	-	-	0%
Public Facility-Other (Senior Center)	Non-Housing Community Development	CDBG /\$0	Public Facility or Infrastructure Activities other than LMI Housing Benefit	Persons Assisted	9136	0	-	-	0%
Public Services: Senior Services	Non-Housing Community Development	CDBG/ \$10,000	Public Service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	13,470	13,470	2015	2015	100%
Affirmatively Further Fair Housing	Fair Housing	CDBG/\$0	Affirmatively Further Fair Housing	Completed AI and Impediments Addressed	Ongoing	Ongoing	2016	-	Ongoing

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.

HOUSING NEEDS

The CP called for the rehabilitation of at least five (5) housing units over 5 years. To date, no CDBG funds have been used for housing rehabilitation as the majority of the monies has gone towards the removal, design and installation of handicapped accessible curb-cut ramps for compliance with a 2011 Consent Decree mandating the installation of approximately 1,300 ramps by 2022. It is noted, however, that a number of families have been provided housing assistance through various programs offered by the Erie County Housing Authority such as (LIHEAP), First Energy PCAP, and the PA Weatherization Assistance Program. The number of families/persons assisted through these programs over the last 3 years are as follows:

- 2013 - ninety-five (95) families consisting of 222 persons
- 2014 - sixty-one (61) families consisting of 136 persons
- 2015 – twenty-one families consisting of 33 persons

NON-HOUSING COMMUNITY DEVELOPMENT NEEDS

Millcreek Township is under a 2011 Consent Decree to install approximately 1,300 handicapped accessible curb-cut ramps by 2022 and as such ramp construction is by far the highest priority non-housing community development need and where the majority of the Township's CDBG funds have been expended over the last 3 years. Utilizing \$151,663.69 in FY 2013 CDBG monies a total of one hundred forty eight (148) ramps were installed in the summer of 2014. In the summer of 2015 one hundred fifty four (154) ramps were installed utilizing \$29,818.31 in residual FY 2013 monies and \$157,173 in FY 2014 funds. This summer (2016) 170 ramps were installed utilizing \$171,675 in FY 2015 funds plus \$11,000 in FY 2014 reprogrammed monies from a deleted project.

Meeting the needs of the elderly is another high priority concern. The Township provided \$10,000 in FY 2015 CDBG funding and \$9,000 in FY 2014 funds to the Erie Center on Health and Aging (dba Erie Lifeworks) to help the Regional Senior Center underwrite operating expenses related to salaries and fringe benefits of staff responsible for programming and service delivery including health screenings, flu/pneumonia vaccinations, podiatry services, and health education workshops.

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))

Narrative

Three (3) projects have been completed during the reporting period. The racial and ethnic status of the families assisted, where known, is as follows:

Phase IV Sidewalk Accessibility Project – The project benefited disabled persons. According to the 2010-2014 ACS data, there are 6,592 persons with a disability in the Township.

	CDBG	HOME	HOPWA
White	6,234	N/A	N/A
Black or African American	223	N/A	N/A
Asian	15	N/A	N/A
American Indian or American Native	31	N/A	N/A
Native Hawaiian or Other Pacific Islander	0	N/A	N/A
Two or more races	89	N/A	N/A
Total	6,592	N/A	N/A
Hispanic	24	N/A	N/A
Not Hispanic	6,234	N/A	N/A
Other	334		

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

Regional Senior Center Operational Support Project – The project benefited senior citizens. According to the 2014 ACS data, there are 13,470 persons in the Township who are 60 and above years of age. Data on elderly persons by racial and ethnic status is not available.

Salsbury Building Automatic Door Operator Installation Project – The project benefited the 71 residents of the Gerald S. Salsbury Building, all of whom are elderly. The racial and ethnic status of the families assisted is as follows:

	CDBG	HOME	HOPWA
White	66	N/A	N/A
Black or African American	5	N/A	N/A
Asian	0	N/A	N/A
American Indian or American Native	1	N/A	N/A
Native Hawaiian or Other Pacific Islander	0	N/A	N/A
Two or more races	0	N/A	N/A
Total	72	N/A	N/A
Hispanic	1	N/A	N/A
Not Hispanic	71	N/A	N/A

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
HUD	CDBG	\$215,875	\$21,648.68

Table 3 – Resources Made Available

Narrative

As of June 30, 2016, a total of \$21,648.68 of the \$215,875 FY 2015 allocation has been expended/drawn-down. This includes \$12,598.33 for General Program Administration and \$9,050.35 for the Regional Senior Center Operational Support Project. It is anticipated that the remainder of the funds will be expended/drawn down by September 30, 2016.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Community-wide	84.1%	84.1%	See below
Site Specific	1.5%	1.5%	See below
Non-Site Specific	14.4%	14.4%	See below

Table 4 – Identify the geographic distribution and location of investments

Narrative

The geographic distribution and location of the projects/activities undertaken with FY 2015 CDBG funding are as follows:

- 1) Sidewalk Accessibility Project – Phase IV
The location is considered community-wide. The project provided for the installation of 170 handicapped accessible curb- cut ramps divided among 35 locations along 19 roads in the Township
CDBG Funding: \$171,675
- 2) Regional Senior Center Operational Support Project
The Erie Center on Health and Aging is located at 406 Peach Street in the City of Erie but the services are available to all elderly residents of Erie County including Millcreek Township. The location is considered community-wide.
CDBG Funding: \$10,000
- 3) Gerald S. Salsbury Building Automatic Door Operator Installation Project
The elderly housing complex is located at 4004 Pacific Avenue in Millcreek Township. The location is site specific.
CDBG Funding: \$3,200
- 4) General Program Administration
Location: Non-site specific
CDBG Funding: \$31,000

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.

The total amount of funding leveraged was \$16,593.29. The primary funding sources were as follows:

- ✓ Erie County Housing Authority (ECHA) /PA Weatherization Assistance Program
- ✓ ECHA/PA Low Income Energy Assistance /Crisis Component (LIHEAP)
- ✓ ECHA/First Energy Warm Program
- ✓ ECHA/First Energy Warm Plus Program
- ✓ County Act 137 / ECHA Weatherization Interface-Home Repairs Project

The number of families, persons and classes of persons assisted through each of the programs is identified in the following chart:

Program/ Funding Amount	Number of Families Assisted	Number of Persons Assisted	Race			Elderly Persons	FHH	Persons with Disability
			W	B	O			
PA Weatherization Assistance \$5,223.06	3	3	(*)	(*)	(*)	3	3	1
PA Low Income Energy Assistance- Crisis Component (LIHEAP) \$3,606.22	7	13	(*)	(*)	(*)	1	4	1
First Energy PCAP (Pennsylvania Customer Assistance Program) \$0	3	4	3	0	0	3	2	1
First Energy (Warm Program) \$1,385.00	1	2	1	0	0	0	1	1
First Energy (Warm Plus Program) \$3,595.53	3	6	3	0	0	2	2	1
National Fuel Gas Low Income Usage Reduction Program (LIURP) \$0	0	0	0	0	0	0	0	0
Act 137 Weatherization Interface-Home Repairs Project \$2,783.48	4	5	(*)	(*)	(*)	3	3	1
TOTAL	21	33	7	0	0	12	15	6

(*) Race Statistics are not required /collected on Client Application

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 the rehab of existing units	0	0
Number of households supported through the 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. Discuss how these outcomes will impact future annual action plans.

In its Five year CP the Township established the goal of providing funding to undertake a planning study to determine the potential for affordable housing developments for seniors and special needs populations. To achieve this goal the Township provided H.A.N.D.S with \$10,095 in FY 2013 CDBG funding to undertake a planning study the data from which would be used to complete a Low Income Housing Tax Credit (LIHTC) application through the PA Housing Finance Agency (PHFA) to construct two (2) affordable housing developments – one for senior citizens and the other for special needs populations. However, once it became apparent that the funding could not cover the scope of work the project was deleted and the funds transferred to the Phase II Sidewalk Accessibility Project.

FY 2014 CDBG funding in the amount of \$11,000 was provided to H.A.N.D.S for the same effort as noted above with the exception that the study would just focus on an elderly development. This project also ended up being deleted, this time due to the inability of H.A.N.D.S to find/acquire a development site/building. The funds were reprogrammed to supplement the FY 2015 CDBG funded Phase IV Sidewalk Accessibility Project.

As the need for affordable housing remains a high priority, the Township has decided to once again provide H.A.N.D.S with CDBG funds (2016) to complete a housing planning study for a potential senior housing development.

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 Persons Served	CDBG Actual	HOME Actual
Extremely Low-income	0	N/A
Low-income	0	N/A
Moderate-income	0	N/A
Total	0	N/A

Table 7 – Number of Persons Served

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 the following:

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

The 2016 Single Point In Time (SPIT) survey of the homeless population in Erie County, PA was conducted on January 22, 2016 by Erie's Home team. In comparing the SPIT data between 2016 and previous years, potential trends are noteworthy. *First*, the total number of homeless individuals counted in 2016 decreased by 16% -- from 1,183 in 2015 to 994 in 2016. *Second*, the total number of homeless single families decreased by 31% -- from 299 in 2015 to 205 in 2016. *Third*, the amount of homeless children in families increased 90% from 117 in 2015 to 222 in 2016.

It should be noted the data collected was for the County as a whole, so there is no information available identifying Millcreek Township's homeless population or subpopulations. Consequently, the nature and extent of homelessness in Millcreek Township is unknown.

Data from the Single Point In Time survey fluctuates from year-to-year and it is difficult to make any broad conclusions about homeless subpopulations, homeless provider trends, and related issues. The ultimate goal of ending homelessness in Erie County is still a long way off. The direct and supportive service providers continue to do the best they can with the resources available to provide services to the homeless population. The Township supports efforts to obtain more resources directed at prevention services which could help Erie County approach its goal of ending homelessness.

Addressing the emergency shelter and transitional housing needs of homeless persons. The Township will continue to support the Home team in their efforts to: 1) develop a coordinated assessment process with the capacity to assess needs and connect families to targeted prevention assistance where possible and temporary shelter as needed; and 2) connect families to housing and services interventions most appropriate to their specific strengths and needs.

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 solution to chronic homelessness is permanent supportive housing which combines affordable housing and a tailored package of supportive services that help people achieve housing stability, get connected to health care and other social services, and improve their health and social outcomes. Studies have shown that permanent supportive housing not only ends homelessness for people with the most severe challenges, but also reduces the use of emergency services and lowers public costs. To this end, the Township will continue to work with H.A.N.D.S in seeking to provide permanent supportive housing for the elderly and special needs populations as proposed in the Five Year CP.

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; or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The Township will continue to support the Home team in their efforts to help low-income individuals and families avoid becoming homeless by: 1) helping families connect to the benefits, employment and community-based services needed to sustain housing and achieve stability, and 2) developing and building upon evidence-based practices for serving families experiencing and at risk of experiencing homelessness.

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 was constructed in 1981. The complex which is owned and managed by the Erie County Housing Authority is comprised of 63 one-bedroom units and 2 two-bedroom units, all of which are occupied. FY 2015 CDBG funds in the amount of \$3,200 provided for the installation of an automatic door operator on the main interior entrance door of the complex to assist elderly tenants safely and easily enter and exit the building.

In addition to conventional public housing, the Housing Authority administers approximately 850 Section 8 vouchers throughout the County (excluding the City of Erie), 283 of which were being utilized in the Millcreek as of August 2016. Approximately one-half of these vouchers are being used at the following apartment complexes: Granada Apartments (92 vouchers); Paul J. Martin Complex (23 vouchers); Cider Mill Apartments (16 vouchers); and Tanglewood Apartments (11 vouchers).

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

The management team of the Housing Authority meets with tenants a minimum of three times a year to solicit input and suggestions regarding issues such as future plans, modernization efforts, and management policies. The improvements to the G.S. Salsbury Building noted above were the result of tenants expressing concerns at a tenant advisory board meeting.

Actions taken to provide assistance to troubled PHAs

Not applicable as HUD has not identified the ECHA as a "troubled" PHA.

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)

In an effort to address the supply demand gap for quality affordable housing units for very low and low to moderate income elderly persons, the Township will be providing FY 2016 funding to H.A.N.D.S to undertake a planning study to determine the potential for an affordable senior housing development. Information from the study will be used to apply for funding through the Pennsylvania Housing Finance Agency's Low- Income Housing Tax Credit Program which if awarded, could result in the construction of 40 new affordable elderly housing units.

Another action being undertaken to address barriers to affordable housing in Millcreek is the ongoing monitoring by the Erie County Housing Authority of Section 8 Vouchers and Fair Market Rental (FMR) rates. The Township's high rental rates make it difficult for voucher holders to find an affordable rental unit. To help alleviate this problem the Authority requested and was approved to use 110% of the Fair Market Rate (FMR) for Millcreek.

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

The primary obstacle to meeting underserved needs was the limited resources available to the Township. Millcreek's FY 2015 CDBG allocation of **\$215,875** is miniscule compared to the identified needs of the community. Additionally, the Township is not entitled to HOME, ESG or HOPWA funds. To overcome this obstacle the Township partnered with agencies/organizations where feasible to leverage resources and maximize outcomes. As previously mentioned, the Township leverages assistance from the Erie County Housing Authority who provides weatherization assistance to income qualifies families in Erie County including Millcreek Township.

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

No FY 2015 CDBG funds were used for single family and/or rental housing rehabilitation. In the event that funding is made available in the future, each unit receiving assistance would be tested for the presence of lead-based paint. If evidence of lead paint is found, surfaces would be removed or the 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 2010-2014 American Community Survey (ACS) data, 10.8% (5,754) of Millcreek Township's population live below the poverty level compared to 5.8% (2,974) in 2000. 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 Erie County 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 formed in 2009 to address the problem of poverty (The Greater Erie Community Action Committee [GECAC], United Way of Erie County, and Mercyhurst University). 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 examine opportunities to align itself with these organization/teams to address this serious social issue in Erie County.

Actions taken to develop institutional structure**[91.220(k); 91.320(j)]**

No changes were taken or are needed to the present institutional structure which consists of the Township supervisors, Township employees (i.e. engineering office) and staff of the Erie County Department of Planning (CDBG Administrator).

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

The Township continues to work with the agencies with which it has developed partnerships to address its various community needs, especially housing assistance and affordable housing. One agency is the Erie County Housing Authority which provides weatherization assistance to residents of Erie County including those in Millcreek Township. Another is H.A.N.D.S which is the premier non-profit agency in northwestern PA in the development and management of multi-family apartment homes for low income families, elderly, and adults with disabilities.

Two groups/organizations the Township may seek collaboration with in the future is the “Home Team” which is the coordinated group in Erie County that works to eradicate the problem of homelessness and “Erie Together” which works to address the issue of poverty.

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

A Regional Analysis of Impediments to Fair Housing Choice was completed by Erie County in March 2015. The Township approved the A/I, including a Fair Housing Action Plan, by means of Resolution on November 10, 2015. The Township is providing the Erie County Human Relations Commission with FY 2016 CDBG funding to hire a qualified, independent consultant to test the rental housing market for possible discrimination.

CR-40 - Monitoring [91.220 & 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 administers Millcreek Township's CDBG program and is responsible for all performance measurement activities. The Department's standards and procedures for monitoring are designed to ensure that:

- ✓ Projects selected for funding are "eligible" activities and meet one (1) of the three (3) National Objectives of the CDBG program: 1) principally benefit low-to-moderate income persons, 2) aid in the prevention or elimination of slums and blight; or 3) meet a need having a particular urgency. As the primary objective of the program is to "principally benefit low-to-moderate income persons", the ECDP makes sure that at least 70% of the funds will be allocated for this purpose.
- ✓ Projects selected for funding address a high priority housing and/or non-housing community development need as identified in the Five Year Consolidated Plan (CP).
- ✓ Projects are consistent with the local comprehensive plan, zoning ordinance, and land development regulations.
- ✓ Program/project activities are carried out in compliance with the regulations implementing the CDBG Program found in 24 CFR Part 570 including labor compliance, environmental standards, financial /management standards, and equal opportunity and fair housing requirements.

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 is to be published in the Erie Times News on Friday, September 2, 2016 as well as posted on the Township's website informing the public that the "CAPER" is available for review/comment from Tuesday, September 7 to Wednesday, September 21, 2016.

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.

Millcreek Township’s CDBG allocations have decreased significantly since it obtained “entitlement” status in 1998 (see Chart below), as has the amount of funding for the CDBG program nationwide. With diminishing and inconsistent funding, many of the objectives set forth in the Consolidated Plan are unlikely to be addressed in the remaining 2 years of the CP. Additionally, the Township is under a Consent Decree to install approximately 1,300 handicapped accessible curb-cut ramps by 2022 and as such the majority of its funding has been allocated for this purpose, leaving few dollars to address other high priority needs such as housing rehabilitation and infrastructure improvements. With fewer CDBG dollars and the constant threat of the program being eliminated, the Township will need to lower its expectations as to the objectives it will likely be able to achieve in the future.

GRANT YEAR	ALLOCATION	(+) (-) \$ DIFFERENTIAL	% DIFFERENCE
1998	\$307,000	-	-
1999	\$309,000	(+) \$2,000	+ 0.6%
2000	\$306,000	(-) \$3,000	- 0.9%
2001	\$316,000	(+) \$10,000	+ 3.2%
2002	\$306,000	(-) \$10,000	- 3.2%
2003	\$311,000	(+) \$5,000	+ 1.6%
2004	\$302,000	(-) \$9,000	- 2.9%
2005	\$283,944	(-) \$18,056	- 6.0%
2006	\$254,483	(-) \$29,461	-10.4%
2007	\$252,478	(-) \$2,005	- 0.8%
2008	\$241,989	(-) \$10,489	- 4.2%
2009	\$242,161	(+) \$172	+ .0007%
<i>2009 (Stimulus \$)</i>	<i>\$65,721</i>	<i>-</i>	<i>-</i>
2010	\$260,948	(+) \$18,787	+ 7.8%
2011	\$217,656	(-) \$43,292	-16.6%
2012	\$195,478	(-) \$22,178	-10.2%
2013	\$210,482	(+) 15,004	+ 7.7%
2014	\$207,716	(-) \$2,766	(-) 1.31%
2015	\$215,875	(+) \$8,159	(+) 3.9%
TOTAL	\$4,805,931		