



Michael Keys
Director, Community Development
City of Warren
258 East Market Street, Suite 305
Warren, OH 44481

April 15, 2024

Dear Mr. Keys:

SUBJECT: FY 2023 Annual Action Plan – Program Year Performance Review

Under the Housing and Community Development Act of 1974, as amended, the National Affordable Housing Act of 1990, and the implementing regulations 24 CFR Part 91, HUD is required to at least annually assess and report that each grant recipient is in compliance with the relevant statutes and has the capacity to continue implementing and administering the programs for which grants have been provided. Specifically, HUD assesses at least the following items per 24 CFR 91.525:

1. Management of funds made available under programs administered by HUD;
2. Compliance with the consolidated plan;
3. Accuracy of performance reports;
4. Extent to which the jurisdiction made progress towards the statutory goals identified in § 91.1; and
5. Efforts to ensure that housing assisted under programs administered by HUD is in compliance with contractual agreements and the requirements of law.

This letter reports the results of our evaluation of your subject Program Year.

The Program Year Performance Review is based on our review of the Consolidated Annual Performance and Evaluation Report (CAPER) for the Community Development Block Grant Program (CDBG), Community Development Block Grant Program – CARES Act (CDBG-CV), and Home Investment Partnership Program (HOME).

Your community's CAPER was submitted into IDIS on March 15, 2024, and this is the City's fourth (4th) year of accomplishments under their 2020-2024 Consolidated Plan. HUD's Office of Community Planning and Development (CPD), along with the Office of Fair Housing and Equal Opportunity (FHEO), annually reviews the performance of grantees in managing their entitlement programs. The CAPER includes performance reporting on each of the formula grant programs, and specific comments related to our review are contained as an attachment to this letter.

In addition to the review of the CAPER, HUD also utilizes other information available through HUD information and reporting systems, information provided by grantees, and information

obtained through the provision of technical assistance to further evaluate the ongoing performance in meeting the program requirements.

During the HUD review process, the CAPER was found to be substantially complete. Based on the information available to and evaluated by HUD, the City continues to generally perform within a statutory and regulatory compliant manner in the use of these resources. Additionally, HUD's review of the CAPER and other available information confirms that the City: (1) carried out its program substantially as described in its consolidated plan submission and (2) has the continuing capacity to carry out the approved program in a timely manner.

The City's continued administration of the CDBG , CDBG-CV, and HOME programs is appreciated and have resulted in many benefits to low- and moderate-income residents. If you have any questions about the enclosed comments or need technical assistance, please do not hesitate to contact Sondra King at 614-280-6109 or via email at sondra.king@hud.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matthew LaMantia", is placed over a rectangular, textured grey background.

Matthew LaMantia, Director
Office of Community Planning and Development

Attachment

REVIEW OF CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION

REPORT COMMENTS

2023 PROGRAM YEAR January 1, 2023-December 31, 2023
City of Warren

This review summarizes HUD's analysis of the City's 2023 Consolidated Annual Performance and Evaluation Report and other reporting submitted to HUD. The purpose of the Consolidated Annual Performance and Evaluation Report (CAPER) is to provide clear and complete information so HUD can meet its statutory requirement to assess each grantee's ability to carry out its programs in compliance with the program's rules and regulations. The report also provides information for HUD's Annual Report to Congress. City officials and the public should be able to use the report to evaluate the city's overall progress in meeting the goals and objectives in its 2020-2024 Consolidated Plan.

The review of the report is based on the requirements in the consolidated plan regulations for performance reports at 24 CFR 91.520 and IDIS reports. The CAPER is found to be complete.

CDBG Program:

Warren has a January 1 Program Year Start Date. As of November 2, 2023, Warren was timely with an adjusted line of credit under 1.50. Warren was untimely, for a second time, in 2022 and the City's effort to stay on the timeliness workout plan and reduce the adjusted line of credit ratio to a compliant 1.50, or less, is significant. As of the last HUD timeliness run on April 1, 2024, the adjusted line of credit ratio for the City was 0.71.

CDBG-CV Program:

The Expenditure Deadline under the CARES Act for Community Development Block Grant Program Coronavirus Response Grants Notice, published on April 18, 2023, removed the requirement that 80 percent of a grant must be expended within three years of grant agreement execution. The six-year deadline remains in place for CDBG-CV grantees to expend 100 percent of their funds. At this point in time, \$824,909.24 (90.8 percent) of the City's \$908,161 in CDBG-CV funds has been expended. Warren should continue to work on getting funds obligated and expended to meet the deadline of July 21, 2026.

HOME Program:

The HOME Program regulations at 24 CFR 92.300 require at least 15 percent of the HOME allocation be set-aside for Community Housing Development Organizations (CHDOs). In its April 10, 2020, memo HUD made available waivers to this requirement for fiscal years 2017, 2018, 2019 and 2020 HOME grants in response to the COVID-19 pandemic. The City is utilizing these waivers for the 2017-2020 grants; therefore, the 15% CHDO set-aside requirement applies to grants from years 2016 and earlier and 2021 and

later. A PR27 Status of HOME Grants report generated April 4, 2024, shows the City progress in meeting the CHDO Set-Aside requirement:

Fiscal Year	CHDO Requirement	Amount Distributed	% Distributed
2023	\$121,989.30	\$0.00	0 percent
2022	\$118,232.55	\$0.00	0 percent
2021	\$110,702.10	\$0.00	0 percent
2020	Requirement waived	N/A	N/A
2019	Requirement waived	N/A	N/A
2018	Requirement waived	N/A	N/A
2017	Requirement waived	N/A	N/A
2016	\$73,544.15	\$102,481.05	139 percent
2015	\$67,120.50	\$67,120.50	100 percent

The 2023 HOME Investment Partnerships Program (HOME) appropriation includes a provision continuing the suspension of the 24-month commitment requirement for Community Housing Development Organization (CHDO) set-aside funds and the suspension of the 24-month commitment requirement for regular HOME funds. Both deadline requirements are suspended through December 31, 2025.

The CHDO suspension applies to any CHDO funds that were deobligated in 2018 or that would be deobligated through 2025 due to a Participating Jurisdiction's (PJ's) failure to commit the funds to a CHDO project within 24 months. Effective immediately, HUD will cease enforcement of the CHDO commitment deadlines until such time as the suspension is permitted to lapse. [HOME Deadline Compliance Status Reports \(DCSR\)](#) posted to the HUD Exchange after February 28, 2019 reflect the suspension of CHDO commitment deadlines.

The City has been working with the HUD Office of Affordable Housing Programs (OAHP) on revised agreements for homeowner units that were converted to rental units. Once this is completed, the 2015-2017 HOME grants will be closed.