

TOWNSHIP OF UNION

UNION NEW JERSEY

2019 CAPER

Consolidated Annual Performance & Evaluation Report

DRAFT

SUBMITTED TO:

US DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

PREPARED BY: BLM CONSULTANTS LLC

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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.

In terms of housing, more than fifty percent of CDBG housing funds for completed units were directed toward housing occupied by seniors. Housing units rehabilitated were brought up to local code standards (7 units). Again, because of the high percentage of older units containing lead in the Township, units rehabilitated were brought up to lead safety standards as required.

In terms of non-housing, the CDBG Road Construction completed project provides an immediate benefit to the 1,130 persons residing in the neighborhood. The importance of the new access to the street improvement is that both disabled and other citizens have greater and more efficient access to neighborhood based amenities.

For special needs, the elderly and youth continue to have access to services that maintain a high quality of educational, emotional, spiritual and physical well being. CDBG public service funds provided a direct benefit to forty two (42) persons via our senior and youth programs

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
Continuation of High Quality Public Services	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$92,207.10	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1965	386	19.64%	50	42	84.00%
Enhanced Public Facilities and Improvements	Non-Housing Community Development	CDBG: \$100,000.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	9000	7845	87.17%	1130	1130	100.00%
Rehabilitate Owner Occupied Housing	Affordable Housing	CDBG: \$299,564.10	Homeowner Housing Rehabilitated	Household Housing Unit	65	53	81.53%	13	*7	53.84%

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

** Due to the Declared State of Emergency by Governor Murphy On March 9, 2020, contractors were not allowed to work for approximately 6 months during PY 2019.*

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.

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	27
Black or African American	21
Asian	1
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
Total	49
Hispanic	1
Not Hispanic	48

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

Narrative

The Township assisted 49 families during Program year 2019. Of the 49, twenty seven (27) families were white including one (1) Hispanic household. The remaining households included twenty-one (21) black or American American households and one (1) Asian househol

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	714,714	

Table 3 - Resources Made Available

Narrative

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Vauxhall CT 328	27		

Table 4 – Identify the geographic distribution and location of investments

Narrative

The Township’s census tract/block group combinations that qualified under the low mod threshold of 32.02%, were 330.00/3,4; 335.00/4; 326.00/1,2; 328.00/1,2,3,4 (Vauxhall); 329.01/3; 332.00/1; 327.00/6. The highest concentration of low income persons reside in census tract 328. Majority of the Township’s funds were directed toward these neighborhoods in 2019.

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.

Table B- Leveraged Funds					
	State	Local	Private	Federal	Total
Center for Hope	\$225,496.64	\$220,589.71	\$629,492.63	\$5,566,416.42	\$6,641,995.40
Jewish Family Services		\$208,985.44			\$208,985.44
Township of Union		\$130,758.35			\$130,758.35
UTCAO- Companion Aide		\$60,000.00			\$60,000.00
UTCAO-Infant Toddler		\$72,000.00			\$72,000.00
YMCA of Eastern UC	\$39,512.00		\$375,872.00	\$84,785.00	\$500,169.00
YM-YWHA of UC			\$683.36		\$683.36
TOTAL	\$265,008.64	\$692,333.50	\$1,006,047.99	\$5,651,201.42	\$7,614,591.55

Public Improvements and Public Facility.

- The Smith Street Improvement Project involved roadway reconstruction including new curb, storm sewers including sanitary sewer, new handicap ramps and N-Eco heads. The reconstructed road eliminated potholes, alligatoring and drainage issues. Overall it improved vehicular traffic, pedestrian safety and handicap accessibility. **\$100,000.00** Leveraged funds were used (\$130,758.35).

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	13	* 7
Number of non-homeless households to be provided affordable housing units		
Number of special-needs households to be provided affordable housing units		
Total	13	*7

Table 5 – Number of Households

**Due to the Declared State of Emergency by Governor Murphy On March 9, 2020, contractors were not allowed to work for approximately 6 months during PY 2019.*

	One-Year Goal	Actual
Number of households supported through rental assistance		
Number of households supported through the production of new units		
Number of households supported through the rehab of existing units	13	*7
Number of households supported through the acquisition of existing units		
Total	13	*7

Table 6 – Number of Households Supported

**Due to the Declared State of Emergency by Governor Murphy On March 9, 2020, contractors were not allowed to work for approximately 6 months during PY 2019.*

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

Due to the Declared State of Emergency contractors were not allowed to work for approximately 6 months. The Township provided rehabilitation assistance to seven (7) households. The Township processed 23 cases during PY 2018 resulting in 7 2019 completed cases.

Discuss how these outcomes will impact future annual action plans.

The Township can continue providing decent and affordable housing to an additional households over the next year.

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	2	0
Low-income	4	0
Moderate-income	1	0
Total	7	0

Table 7 – Number of Households Served

Narrative Information

The Township expended \$ 131,722.66 on owner occupied housing rehabilitation completed in 2019. During the 2019 program year, seven (seven) housing units were rehabilitated.

As indicated in the five year plan, the Township’s priority is to direct the majority of its funding resources to the low to extremely low income households in need. The Township gives priority to these low income households when reviewing applications for funding. During 2019 households were 100 percent extremely low to moderate income. Of these households, 86 percent were less than moderate income. In 2019, the Township processed 23 rehabilitation applicants for a total of 7 completed cases

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

A study was conducted and determined that there were 438 homeless men, women and children counted in Union County according to the January 22, 2019 Point In Time Count of the Homeless. The New Jersey's Continuums of Care conducted a count of sheltered homeless persons in emergency shelter, transitional housing and Safe Haven programs to determine their housing needs. Homelessness in Union County has decreased since 2018 by 21 persons (5%). The number of households increased by 15 to 298 from 283 in 2018. Of the homeless counted, there were 68 chronically homeless in 58 households counted in Union County.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Township's strategy for implementing its homelessness strategy has been a multiple approach to the problem, focusing upon assisting the homeless and then upon preventing homelessness. Treating the homeless and providing the means and support via referral services necessary to make the transition to permanent housing and independent living are all a part of the efforts and programs in place in the Township and/or the County. To that end most of the efforts to provide continuum of care is coordinated with other municipalities in the county. In September 2010, New Jersey's County Homelessness Trust Fund Act, P.L. 2010, c. 123, became law which permits counties to establish a Homelessness Trust Fund for the purpose of moving the homeless and formerly homeless into permanent affordable housing.

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

The Township's internal strategy for eliminating chronic homelessness has been to focus on a specific housing emphasis identified in the five-year consolidated plan and annual action plans under the Housing strategy category. They included:

- First-Time Homebuyer Program UC

- Homeowner Rehabilitation
- Rental Assistance

In establishing the Township's priorities, the prevention of homelessness has been a key element in our efforts. By providing rehabilitation assistance and referral services for low-income households the Township has contributed to reducing the conditions that would precipitate homelessness.

As a result, during program year 2019, the Township directed all of its housing funds under the CDBG program toward owner-occupied rehabilitation. Of the seven (7) units that were completed and received housing rehab assistance all were extremely low to moderate income households. These homeowners are cost burdened and/or have no funds to contribute to maintaining their homes. Providing this assistance ensures that these homeowners can continue to occupy their homes and avoid potentially becoming homeless due to housing cost burdens.

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

According to a January 2019 survey, there are 438 homeless people in Union County, 114 are children. We want Union County families in financial distress to have, at the very least, a stable and healthy environment for their children. We continue to work closely with local community organizations in the most efficient way to accomplish this goal. In March 2019 Union County received a grant of more than \$4.3 million in new federal grants to cover 19 housing programs and initiatives. These are operated Bridgeway Rehabilitation Services, Inc., Community Access Institute, Community Access Unlimited, Covenant House New Jersey, Elizabeth Coalition to House the Homeless, The Gateway Family YMCA, Homefirst Interfaith Housing and Family Services, Housing Authority of the City of Elizabeth, Housing Authority of Plainfield, YWCA of Union County, and the Union County Department of Human Services. The Union County Department of Human Services works closely with these community organizations to submit a joint application to HUD each year, to apply for funding. The County provides HUD with a detailed comprehensive account of Union County's needs and resources across the board. "This high degree of professionalism and cooperation enables Union County to obtain additional funding for vital programs on a competitive basis. Among the important resources available include the following:

- For Homeowners

- NJ Housing Counseling Agencies – provide foreclosure prevention counseling. Residents can call directly to receive assistance. Examples include:
 - NJ Citizen Action
 - Urban League of Union County
 - Brand New Day
 - Faith, Bricks & Mortar, Inc.

- NJ Judiciary Foreclosure Mediation Program - provides homeowners with access to housing counselors and court trained mediators to resolve foreclosure actions by proposing work-out and payment arrangements between distressed borrowers and lenders.
- Anti-Predatory Lending – Legal Services of NJ provides legal representation to low income New Jersey homeowners.

- For Renters
 - Eastern Union County & Western Union County – these organizations assist persons who may be candidates for eviction due to landlord neglect of mortgage payment. In New Jersey, persons may only be evicted by written order from a Superior Court Judge.

 - Housing Resource Center – provides a statewide listing of vacant, for sale and rental properties for free.

 - Homeless Prevention – NJ Homelessness Prevention Program provides limited financial assistance to low and moderate income tenants and homeowners in imminent danger of eviction or foreclosure due to temporary financial problems beyond their control. Funds are used to disburse payments in the form of loans and grants to landlords and mortgage companies.

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

Actions taken to address the needs of public housing

The objective of Township's Section 8 program is to work in conjunction with the CDBG program to provide housing that is affordable to very low-income households in the private rental market. Households must meet eligibility requirements. Through Section 8, renters pay no more than 30 percent of their adjusted monthly income towards their monthly rent and utilities. The balance of the rent is paid directly to the owner of the rental properties. As of the end of program year 2019, 111 units were occupied by Section 8 occupants. Local objectives for rental housing included the following:

- Utilization of funds to ensure the greatest number of applicants served
- Utilization of briefing information to advise applicants and tenants of protection for victims of abuse and domestic violence.
- Encouragement of lease-up in all areas in its jurisdiction by working with landlords and other local agencies to provide safe, decent and affordable housing.
- Review of preference selections to address changes in federal regulations and requirements.
- Support of Township local housing goals and objectives.

Important components and requirements of the program are as follows:

1. Eligibility is determined based on the annual income guidelines as determined by HUD. Placement on the Wait List is a ranked and weighted system of preferences. The Federal Income Target preference carries the most weight followed by local preferences of Homeless or Victim of Domestic Violence, working families, residents, and then elderly, disabled or veteran. The working family preference is automatically given to an elderly or disabled family and the resident preference is automatically given to any applicant who lives or works in the Township of Union. Placement on the Wait List by order of preference determines selection. All new applicants over the age of eighteen are subject to a criminal screening by the agency to the extent required by law. Ineligible applicants are given the opportunity to refute the information in the report if denied assistance. Applicants are encouraged to keep the program informed when their preferences change and update letters are sent out every second year to ensure accuracy. Once eligibility is determined and a voucher has been issued, extensions may be granted based on illness, availability of housing and the local housing market.
2. Total CY 2019 HAP New Budget Authority Funding was \$1,416,014.00.
3. It is the PHA policy to base current payment standards on 100% of the HUD published Fair Market Rents as long as funding permits. The Housing Agency will review the payment standards for adequacy at least annually or more frequently if the success rate of assisted families drops or if the rent burden increases. The Housing Agency may lower the payment standards if necessary to prevent termination of assistance to current tenants. The HA has established a minimum rent of \$50.00.

4. Owners are required to maintain the assisted units in accordance with Housing Quality Standards (including providing adequate documentation of ongoing pest management). Failure to do so results in abatement of housing assistance payments.
5. Applicants and tenants are given a copy of the grievance/informal hearing procedures and instructed that a written request must be made within ten days from the date of any letters/occurrences. If the situation is not able to be resolved, a formal hearing will be conducted. The procedure lists those situations where a hearing can be requested as well as those where a hearing cannot be requested.
6. The PHA does not intend to apply for designated housing for elderly or disabled projects as this is a Section 8 only tenant based program.
7. The PHA makes each applicant/tenant aware of the protections afforded by the Violence against Women Act at the time of selection from the Wait List and at every subsequent recertification. Referrals to local agencies who provide assistance and counseling to victims are provided upon request.

The Housing Assistance Program of the Township of Union has achieved the mission strategies identified in the 2015 five year plan relative to the funds provided for the program by the Department of Housing and Urban Development. The final SEMAP score for the fiscal year ending 12/31/2019 was 85%. The overall performance rating is High Performer. The staff has attended/viewed all HUD on line training programs including EIV/PIC and Fiscal/REAC. Units are inspected annually and Annual Audits confirm that families are paying fair and reasonable rents in accordance within the program guidelines. Portability counseling is provided at the time of the initial briefing and any time the tenant moves. Flyers for interested landlords were posted in the Municipal Building and Township Libraries and on the webpage to encourage landlords to contact the program director. As of the end of the five-year period, the program was leased almost to the baseline using the HAP Reserve. Full lease up is not possible due to funding limits. Employment has been encouraged through the use of a local preference for working families. The program staff operates in a professional manner and maintains quality of service. The Plan now includes a policy to terminate assistance caused by a lack or loss of funding after all attempts to reduce costs are exhausted.

The PHA has maintained the Section 8 lease-up rates by establishing payments standards that will enable families to rent throughout the jurisdiction and undertake measures to ensure access to affordable housing by marketing the program to owners and participation in the Consolidated Plan development process to ensure coordination with community strategies.

There are currently 66 applicants on the Wait List.

- 60 are families with children,
- 4 is elderly,
- 2 are families with disabilities.
- 21 are income targeted.

The Wait List has been closed since March 2006.

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

The housing assistance program does not administer a homeownership program.

Actions taken to provide assistance to troubled PHAs

The Township does not have public housing facilities.

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)

Since 1975, the County has been providing financial assistance through direct grants as well as technical and advisory assistance to non-profit and community agencies that administer a wide variety of programs for lower-income residents. These programs have an immediate impact on the primary needs of the low-income population and the causes of poverty. CDBG provides the core funding for critical basic needs including health, elder care, childcare, housing, and transportation.

The Union Housing Agency, a provider of affordable housing, is aware of the programs available for residents and makes appropriate referrals, as well as providing some training programs on site. Specific coordination is through the Department of Human Services.

Housing rehabilitation assistance is provided as a coordinated effort to preserve and produce affordable housing. This type of assistance is provided to assist people from being trapped in the cycle of poverty and ameliorate housing problems and costs.

These efforts, and the support of the economic development and job creation efforts of the CEDS committee, complement the housing program administered through the Township's CDBG and County HOME programs. In sum, the programs currently operated represent coordinated efforts to address housing and economic issues that surround the homeless and lower-income households.

The Township recognized need for assistance far exceeds current levels of available resources.

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

Throughout the five-year period of the Consolidated Plan, the objectives section of the Annual Action Plan listed the primary obstacles to meeting underserved needs in each of the listed objectives. Unfortunately, these obstacles continued to create challenges in meeting the various housing and special needs of Township citizens during 2019. In housing, homeless and special needs area, some of the challenges included the lack of vouchers to assist low-income tenants, tight regional housing market and rising cost trends in construction.

With respect to non-housing community development needs, the principal impediments identified were inadequate funding levels and resistance to increasing property taxes to provide projects and services in identified areas of need.

Probably the most important obstacle to meeting the underserved needs in the Township is the lack of available funding to the various non-profit agencies the Township collaborates with to address the needs of our low or stay stagnant income population. As entitlement grants shrink the cost of delivering services and bringing projects to completion increases creating an ever widening spread of costs and available funds. Mirroring this trend is the difficulty in leveraging funds from state and other sources which have also remained stagnant.

These barriers to meeting underserved needs continued to handicap the Township in fully realizing its objectives during the Consolidated Plan period. Despite these barriers, the Township was still able to make progress in some of the areas identified in the Action Plan.

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

An understood reality among older communities is that its housing stock contains high levels of lead-based paint. The Township of Union is no exception and census data indicated that an estimated 14,092 housing units contained lead-based paint as of the most recent Census. Additionally, there are an estimated 5,887 units of housing that are affordable to low-and very low income households that may contain significant levels of lead based paint. These affordable units represent 30.7 percent of all housing units in the Township.

During program year 2019 of the 7 completed housing rehabilitation cases four (4) were found to have lead and lead remediation was conducted in each unit.

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

Poverty is clearly a common concern for the Township of Union. Despite a strong economy and low levels of unemployment at the national and state levels, Union continues to have relatively high unemployment, and the latest poverty figures indicate that 4.6 percent of the Township's population, concentrated primarily in several pockets, lives in poverty.

Eliminating this poverty is a clear concern for the Township and efforts are constantly under way to improve the quality of life and economic well-being of Union residents. These programs cover a wide range of topics and measures to improve the lives of residents in the Township and County wide.

- Education and Job Training
- Job Placement
- Day Care
- Family Counseling
- Energy Management and Weatherization

- Small Business Development
- Budget/Credit Counseling
- Food Resources and Nutrition Services

The Township does not have a specific anti-poverty strategy or program; rather the Township views activities to address affordable housing, prevent homelessness, and improve the economic prospects of its low-income residents as part of a comprehensive and varied effort to reduce the level of poverty in our community.

One of the most important tools in reducing poverty is to decrease the cost of housing. High housing costs reduce the ability of families to pay for other essential needs, such as food, clothing, and education. The Township's Five Year Consolidated Plan sets goals and objectives to increase the supply of affordable housing, especially for very low- and low income households.

The Township's anti-poverty strategy is inextricably linked to the Economic Programs that have been implemented and operated over several years. The objective of poverty reduction requires programming from job areas including job training, and placement, public services, education, and basic skills development. The overriding principle however is to create new jobs and opportunities for households with incomes below the poverty level. It is only through comprehensive, coordinated strategies that nurture skills and opportunities to gain and retain employment and thus improve the quality of life that people can improve their situation.

One cornerstone of the Township's antipoverty efforts is the work of the Union County Comprehensive Economic Development Strategy (CEDS) committee, which in particular recommends or endorses grant applications to the US Department of Commerce, Economic Development Administration. The organization, composed of a board range of County stakeholders, meets regularly to discuss and analyze economic development and economic development projects across the County and to facilitate the sharing of information and ideas to support economic growth.

It is essential to provide the basic skills, training, and education necessary to make a person employable in today's competitive job market. The Township works with the Boards of Education to assist persons obtain high school diplomas or the GED certificate. The Township facilitates and supports programs to coordinate training programs provided by public institutions with the needs of employers.

However, other education and training programs contribute to achieving the objective of reducing poverty. Example of these include job training and job placement activities sponsored by the Workforce Investment Board, the Welfare to Work Program, day care funding throughout the County, long-term employment opportunities for severely disabled adults, and life skills

development programs. The VO-tech schools and Continuing Education Programs also provide important training and educational opportunities for local residents.

Employment programs only reach a part of the poverty population. Many of the people in living in poverty are not employable and thus the Township works cooperatively with numerous public, social, and civic service organizations to develop and implement direct assistance and service delivery programs to improve the quality of life of these persons. The first step in providing health and social service is necessary to enable an unemployed person to become employable.

The Township also supports programs and activities that promote a stable and growing economy. CDBG funds are employed to support a number of not-for-profit organizations. Business assistance loans and guarantees are available to firms that wish to expand at the state and county level. In return for below market rate loans and support these firms pledge to create jobs for low and moderate -income persons. Many of these loans are to small and very small firms that offer growth potential for the community and the region.

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

Intergovernmental cooperation is vital to the success of these efforts, given the diversity of programs and agencies providing housing services.

The Township Committee, through the division of Housing and Community Development, has the ultimate responsibility in assuring that the priority needs of the Consolidated Plan are met. The Division provided CDBG and local funding and technical assistance to the service providers, Township agencies and authorities for projects that meet the needs documented in the plan.

The Township of Union does not have a formal relationship with the Township non-profit housing corporations (3). The Township does not have any other relationship with these housing agencies concerning the PHA administration, development, or other activities.

The Township maintains a close relationship with the Union County Division of Planning and Community Development, and coordinates efforts with that agency which administers the County CDBG programs. Depending upon the situation and the need, the Township officials coordinate with or call upon County offices, such as the Department of Health, or programs for information or assistance.

The Township's 2018 Action Plan was coordinated and submitted via the County Division of CDBG & Planning who is the Lead Agency. Further, Township maintains a relationship with the State of New Jersey to ensure cooperation and coordination in implementing its strategy.

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

The Township has followed the procedure and requirements published by HUD. The Township and its housing consultant attended the HUD training sessions in order to prepare for the preparation and submission of this document annually.

The Township recognized that the preparation of the Consolidated Plan and its associated Action Plan and CAPER documents require discussion and consultation with many diverse groups, organization and agencies. Meetings and discussion were held between the staffs of the Township Community Development Block Grant Program Office and the Township Division of Planning, the Township Board of Health, and the Union County Division of Housing and Community Development. The New Jersey Department of Community Affairs was consulted via its Section 8 Rental Assistance Program. The Department of Community Development meets monthly with Township Administration and Department Heads (Citi Stat).

In addition, there were meetings conducted and conferred with appropriate housing and social service agencies regarding the needs of children, elderly person, persons with disabilities, and homeless persons. These agencies included the Human Services Advisory Committee (HSAC) of Union County. The Township also has a Community Development Citizens Advisory Committee, made up of two persons each from the Townships census tracts, as well as a special task force representing special needs. The committee acts in an advisory capacity.

The collaborative approach employed by the Township has proven to be a valuable tool in eliciting input that would not otherwise be available. This development process synthesized diverse ideas and approaches into a comprehensive ideal and approaches into a comprehensive and coherent planning document and set of strategies that addresses the low income housing need of the Township of Union in a clear and logical fashion.

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 Township provides for the affirmative furthering of fair housing through appointment of a local Fair Housing officer. Funding is available to support the costs associated with staff and fair housing program activities. This provides funding for an expanded fair housing program. Actions synonymous with the program have included:

- Marketing of affordable housing dwelling units;
- Housing Assistance Program
- Counseling and referral services for persons seeking rental and assistance purchasing housing in the Township, in conjunction with the County Home Consortium.

- First Time Homebuyer referrals

In addition, the Township is a member of the Union County HOME Consortium and is working with the County to address County identified impediments to fair housing.

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

Performance monitoring is an important component in the long term success of this program. The Township is responsible for developing standards and procedures for ensuring that the recipients of housing funds meet the purpose of the appropriate regulations.

The Office of Community Development administers the Township's CDBG program and is responsible for most performance measurement activities. Measurement standards and methods are incorporated into the process of awarding funds, allocating resources to programs and agencies and obtaining progress and completion reports from those programs and agencies. The monitoring requirements and procedures build upon existing monitoring systems and experience in administering federal and state programs and funds.

The monitoring is performed through the use of checklists and forms that are currently used to facilitate uniform monitoring of program activity. Monitoring will occur through regular telephone calls, desk monitoring and on-site monitoring visits. These visits occur as necessary, but are conducted at least once every two years.

All sub recipients have identified the personnel who will work on the project, keep records and files in order to document program benefit and compliance.

The results of the monitoring are that all Township agencies were compliant with subrecipient agreements which included reviews of record keeping, reporting requirements, national objective compliance, project schedule and milestones, time of performance and scope of work. Monitorings were conducted and are on file for all Community Development recipients FY 2019.

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.

Union Township utilized the Union Township Community Development Citizens Advisory Committee. This group acts in an advisory capacity and holds several public meetings yearly in accessible places at convenient times after providing reasonable notice. Public meetings are posted on the Township's calendar and website. The committee and interested parties were afforded a variety of opportunities to:

- 1) contribute during meetings and planning sessions,

- 2) review and comment upon the participation plan itself,
- 3) receive information about the meetings, the plan, and comments made about the plan,
- 4) participate in public hearings,
- 5) comment upon the plan and its amendments, and
- 6) register complaints about the plan and its amendments.

Federal Regulation 24 CFR Part 570 and 24 CFR Part 91 requires Union Township to provide notice of availability of its draft Consolidated Annual Performance and Evaluation Report for citizen comment. The required notice was published January 12, 2021. In accordance with HUD requirements the draft CAPER was made available for citizen review and comment for fifteen (15) days starting January 12, and ending on January 26, 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 necessary.

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

No.

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

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.

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

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