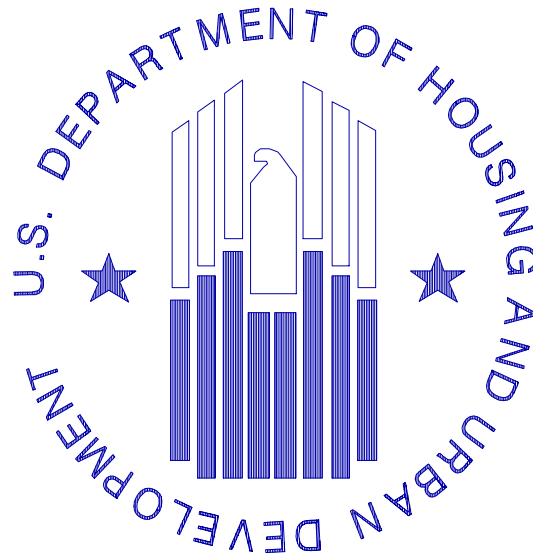


**U.S. Department of Housing & Urban Development  
Buffalo, New York Office**



**2022 Annual Community Assessment Report**

**For  
City of Rome, New York**

**Covering the Program Year of:  
4/1/2022 – 3/31/2023**

## INTRODUCTION

As a recipient of grant funds provided by the Department of Housing and Urban Development, each jurisdiction that has an approved Consolidated Plan shall annually review and report to HUD on the progress it has made in carrying out its Consolidated Plan and Annual Action Plan. The performance report is submitted to HUD in the form of the Consolidated Annual Performance and Evaluation Report (CAPER).

HUD has the responsibility to review the CAPER and the performance of each jurisdiction on an annual basis. In conducting performance reviews, HUD primarily relies on information obtained from the recipient's performance reports, records, findings from monitoring reviews, grantee and subrecipient audits, audits and surveys conducted by the Inspector General, and financial data regarding the number of funds remaining in the line of credit plus program income. HUD may also consider relevant information pertaining to a recipient's performance gained from other sources, including litigation, citizen comments, and other information provided by or concerning the recipient. A recipient's failure to maintain records in the prescribed manner may result in a finding that the recipient has failed to meet the applicable requirement to which the records pertain. Such information, along with grantee input, is considered in HUD's Annual Community Assessment (ACA) to decide whether a grantee has the continuing capacity to administer HUD programs.

The ACA provides feedback on your community's performance in delivering HUD's Community Development Programs. This report is presented in four sections.

- I. **Consolidated Plan & Annual Action Plan** provides a general overview regarding compliance and reporting accuracy.
- II. **Overview & Crosscutting** evaluates grantee performance in key crosscutting functions.
- III. **Program & Performance** evaluates the progress and performance of each specific HUD program.
- IV. **Summary & Recommendation** provides recommendations and/or areas for improvement.



## PROGRAMS AND FUNDING AMOUNTS

Grant	Amount	Period
CDBG	\$990,882	4/1/2022 – 3/31/2023
CDBG-CV	\$908,793	9/11/2020 – 9/1/2027

## **I. Consolidated Plan & Annual Action Plan**

The Consolidated Plan is designed to help states and local jurisdictions to assess their affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions.

Annual Action Plans (AAP) provide a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan.

The City of Rome has completed Year 2 of their 5-year Consolidated Plan (2020 – 2024). Below is a summarized comparison of the grantee’s Consolidated Plan priority needs and goals along with the grantee’s 2021 AAP projects.

### 2020 – 2024 Consolidated Plan

2022 Priority Needs and Goals
1. Planning and Administration
2. Public Services
3. Public Facilities and Infrastructure
4. Economic Development
5. Slum and Blight

### 2022 Annual Action Plan (Year 4 of 5)

Goals and Projects	Amount Allocated
<b>Economic Development</b>	<b>\$ 49,544</b>
Economic Development	\$ 49,544
<b>Planning and Administration</b>	<b>\$ 168,450</b>
Planning and Administration	\$ 168,450
<b>Public Facilities and Infrastructure</b>	<b>\$ 544,985</b>
Public Facilities	\$ 544,985
<b>Public Services</b>	<b>\$ 128,815</b>
Public Services	\$ 128,815
<b>Slum and Blight</b>	<b>\$ 99,088</b>
Real Property	\$ 99,088
<b>Grand Total</b>	<b>\$ 990,882</b>

## HUD Reports

The AAP provides a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan.

The CAPER details the progress for the year as well as the progress compared to the five-year goals in the Consolidated Plan. The assessment is to be reported in terms that are quantifiable (numbers of accomplishments, outcomes) so that the public can easily review the activities undertaken and completed during the program year.

Reports	Due	Submitted
2021 AAP		
An AAP is due 45 days before the grantee's program year begins.	2/15/2021	6/21/2022*  *HUD funds were delayed which prevented timely submission of AAP.
2021 CAPER		
A CAPER is due 90 days after the grantee completes the program year.	6/29/23	6/28/23

## II. Overview & Crosscutting

### Fair Housing and Equal Opportunity

The Rome CAPER is evaluated by Region 2 Office of Fair Housing and Equal Opportunity (FEHO). The City of Rome did not indicate any Multifamily Housing programs have been utilized, nor did it indicate that any properties in Multifamily Housing's portfolio benefitted from CPD funding. Therefore, Multifamily Housing has no comment or objection to the Plan as submitted.

### HUD Compliance Monitoring

HUD determines which grantees it will monitor based on a risk analysis of each grantee's programs, functions, and performance, as well as the Department's exposure to fraud, waste, and mismanagement. Monitoring entails interviews and file reviews to verify and document compliance and performance (and can include physical inspections if monitoring is conducted on-site). Monitoring conclusions are determined using Monitoring Exhibits which contain questions that are designed to assess and document compliance with program requirements.

Last Monitored	Areas Monitored	Results
2021	CDBG	1 Finding; Closed

### Subrecipient Oversight & Monitoring

The City of Rome monitors its subrecipients through desk and on-site monitoring. Subrecipients are required to submit program and financial reports to assess performance, client eligibility, and timeliness. agreement’s income, client eligibility, reporting requirements and timeliness. In addition, subrecipients must also undergo an annual single audit to ensure financial fitness and compliance.

### Citizen Participation

The primary goal of citizen participation is to provide residents—especially low- and moderate-income (LMI) residents of the community where CDBG-funded activities will take place—the opportunity to actively participate in the planning, implementation, and assessment of the programs and projects.

Citizen Participation Period	Start Date	End Date	Public Hearing
2022 AAP			
The AAP requires a 30-day citizen comment period along with one public hearing.	1/25/2022	2/23/2022	12/8/2021, 2/10/2022
2022 CAPER			
The CAPER requires a 15-day comment period.	5/18/2023	6/2/2023	N/A

### Citizen Comments and/or Inquiries

No comments were received.

## **III. Program & Performance**

### Accomplishments

The City of Rome launched a new Down payment Assistance Program for first time homebuyers in the City of Rome. Public facility improvements progressed in two areas: the Downtown Brownfield Opportunity Area and the Local Waterfront Revitalization Program. The Waterfront Village revitalization plan improved neighborhood streets, sidewalks, lighting, and tree plantings. This created access for residents to convenience stores, a park, and the Canal Trail. The Mohawk River Trail overlook was also completed which includes a public respite area for park users and residents within the Bell Road neighborhood and Clough Pre-K School.

CDBG-CV funds were used to improve a public plaza space in the Copper City Commons located in Rome’s downtown core district. This project coincided with local startups and

business expansions. Improvements included ADA-compliant walkways and seating areas for comfort and usability.

Type	Description	Metrics	
Economic Development	Projects to improve public plaza spaces within Rome’s Downtown core district.	Businesses Assisted	1
Public Facilities and Infrastructure	Projects to improve neighborhood streets, sidewalks, lighting, and tree plantings.	Persons Assisted	2500
Public Services	Projects to provide services to community members: <ul style="list-style-type: none"> <li>• Youth Services</li> <li>• Substance Abuse Services</li> <li>• Services for victims of domestic violence</li> <li>• Health Services</li> <li>• Mental Health Services</li> <li>• Homebuyer Downpayment Assistance</li> </ul>	Persons Assisted	690
Slum and Blight	Projects to mitigate slum, blighted, deteriorated or deteriorating areas.	Buildings Demolished	9

### CDBG Expenditure Requirements

Financial Factors	Requirement	Actual
<b>Low- and Moderate- Income (LMI) Benefit</b>		
The LMI national objective is often referred to as the “primary” national objective because the statute requires that recipients expend 70 percent of their CDBG funds to meet the LMI national objective.	70% of the annual allocation	86.83%
<b>Timeliness</b>		
The CDBG timeliness goal requires a grantee to have no more than 1.5 times the annual allocation plus the prior year’s program income 60 days before the beginning of the program year.	1.5 times the annual allocation plus program income	1.16 at the 1/31/2023 test date.
<b>Planning And Administration</b>		

The CDBG program rules allow the grantee to spend up to 20% of their annual allocation plus prior year's program income on eligible planning and administration costs.	20% or less of the annual allocation plus program income	18.21%
<b>Public Service</b>		
The CDBG program rules allow the grantee to spend up to 15% of the annual allocation plus the prior year's program income on eligible public service costs.	15% or less of the annual allocation plus program income	12.81%
<b>Federal Financial Reports (SF-425/PR-29)</b>		
Grantees must report their cash on hand to HUD every quarter. It should be noted that the SF-425 has replaced by the PR-29 Report as of 9/30/2019. The cash on hand report for CDBG-CV must also be reported in the PR-29 quarterly beginning 10/1/2021.	Quarterly, within 30 days following each quarter end date	Financial reports are current through 6/30/2023.
<b>2 CFR 200 Audit Requirement</b>		
Grantees who qualify for single audit reports are required to submit their results to FAC at the end of their fiscal year.	Must be submitted to FAC within 30 days following audit report receipt or within 9 months of grantee's FY end.	Single audit report is current through FYE 12/31/2021. Most recent FYE audit submitted to FAC on 7/20/2022. In compliance with 2 CFR 200.512(a)(1), submitted within 30 days following the audit report date of 6/29/2022.No current (FYE 2021) or prior (FYE 2020) single audit report findings noted.

### CDBG-CV Expenditure Requirements

Financial Factors	Requirement	Actual
<b>Low- and Moderate- Income (LMI) Benefit</b>		
The LMI national objective is often referred to as the "primary" national objective because the statute requires that recipients expend 70 percent of their CDBG-CV funds to meet the LMI national objective.	70% of the annual allocation	78.55%
<b>Timeliness</b>		

The CDBG-CV timeliness goal requires that a grantee expend 100% of the grant within seven years of it being awarded. Program income generated from CDBG-CV is factored into the grantees annual CDBG allocation.	100% of the annual allocation within 7 years	94.08 % as of 7/3/2023. Deadline of 9/1/2027, with \$53,844.88 remaining to spend.
<b>Planning And Administration</b>		
The CDBG-CV program rules allow the grantee to spend up to 20% of their grant funds on eligible planning and administration costs. Program income generated from CDBG-CV is factored into the grantees annual CDBG allocation.	20% or less of the annual allocation	11%
<b>Public Service</b>		
The CDBG-CV program rules state that the 15% cap has been lifted for public services that prevent, prepare for, or respond to coronavirus. Program income generated from CDBG-CV is factored into the grantees annual CDBG allocation.	None. 15% cap has been lifted.	45.01%

#### **IV. Summary and Follow-up**

The City of Rome completed another successful program year administering CDBG and CDBG-CV. The City had implemented an Annual Action Plan that addressed the stated priorities and goals within their Consolidated Plan through both CDBG and CDBG-CV. This year's accomplishments include progress in fair housing arising from a new Downpayment Assistance Program and public facility improvements to the Downtown Brownfield Opportunity Area, the Local Waterfront Revitalization Program, and the Copper City Commons. The City submitted all reports on time, met all financial expenditure requirements, and was able to meet timeliness this year. This report concludes with no additional comments or recommendations. The City of Rome has used CDBG funds to continue improving the wellbeing of its residents, while demonstrating the value these funds can bring to a community through effective planning and administration. No follow-up is required.

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HUD is providing you the opportunity to review this assessment and comment. Based on the information available at the time of this review, HUD has determined that the City of Rome has the continuing capacity to carry out HUD programs identified in this report.

The City of Rome may respond within 30 days concerning the information contained in this report. If you have any questions or would like to discuss the Assessment Report, please contact Sean Tulumello, CPD Representative, who can be reached by phone at (716) 646-7014 and by email at Sean.T.Tulumello@hud.gov. If you disagree with this assessment, please respond via email to: [William.T.OConnell@hud.gov](mailto:William.T.OConnell@hud.gov). Your response should identify any areas of disagreement and corrections or any additional comments you would like HUD to consider.