



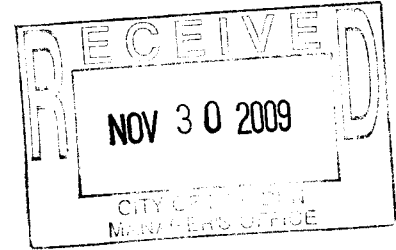
U.S. Department of Housing and Urban Development

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New England

Mr. Lawrence J. Kendzior
Manager
City of Meriden
142 East Main Street
Meriden, CT 06450-8022

NOV 25 2009



Dear Mr. Kendzior:

The City of Meriden received \$899,877 in Community Development Block Grant (CDBG) funds in Federal Fiscal Year 2008, the year covered by this report. This is the Department's report on our assessment of the use of those funds.

The Housing and Community Development Act of 1974, as amended, and the National Affordable Housing Act of 1990, require that grant recipients submit annual performance reports for the programs covered under these Acts. The Acts also require the Secretary of HUD to determine annually that the grant recipient is in compliance with these statutes, and has the continuing capacity to carry out the programs for which it receives funds.

Our review includes an analysis of each grantee's planning process; its management of funds; progress in carrying out the strategies and goals expressed in the Consolidated Plan; compliance with statutory and regulatory requirements; accuracy of required performance reports; and evaluation of its accomplishments in meeting key Departmental objectives. We call your attention to the section of our assessment entitled Affirmatively Furthering Fair Housing and to the discussion of code enforcement activities in Areas of Concern and/or Consideration.

Our Annual Assessment is directed not only toward meeting the mandates of the statutes, but to provide the basis for working together collaboratively to achieve the revitalization goals of your community.

We congratulate you on your community's accomplishments during this past year regarding the achievement of Departmental objectives.

Noteworthy Accomplishments

Meriden revamped its Neighborhood Preservation Program (NPP) to address lead-based paint contamination issues in housing units slated for rehabilitation. Although the City temporarily suspended the provision of CDBG rehabilitation loans and did not rehabilitate any properties in program Year 2008, the NPP made substantial progress in eliminating lead hazards in properties that were rehabilitated in prior years.

The City continued its efforts to maintain and upgrade its housing stock through various code enforcement related efforts.

- The City conducted 12 interdepartmental code enforcement walks in low-income areas during the year.
- A total of 3799 inspections were completed in the Code Inspection Program. During these inspections, 2324 violations were noted and 1866 were corrected.
- Litter and graffiti was removed from more than 100 City-owned properties.
- One blighted and hazardous structure was demolished.

The City also continued its tradition of using its CBDG allocation to improve the lives of residents through a variety of public services programs. Funds to provide a suitable living environment were targeted to the special needs of homeless, elderly and disabled residents as well as children. Examples of services provided to these populations include:

- Counseling and case management services by MW Chrysalis, Shelter NOW, SAIR Corps and Women and Families Center's Project REACH to residents who were homeless or in danger of becoming homeless. A total of 2956 units of service were provided.
- Counseling services for 1367 at-risk children by the Child Guidance Clinic and Catholic Charities.
- Access to recreation services, job and leadership training and after school activities for 4039 Meriden youth by a variety of agencies and the City.
- 16,627 meals for those in need by the Meriden Soup Kitchen.
- Assistance to maintain independent living for 70 seniors by the New Opportunities Chore Service Program. The American Red Cross transported 47 seniors to out-of-town medical appointments.

General

Meriden met the standard the Department uses to determine if communities are delivering program activities to residents in a timely manner. The grant recipient must have no more than 1.50 years of unexpended CDBG funds in its line of credit 60 days before the end of the program year. Meriden's 60 day balance was equivalent to 1.11 years of grant funding. The City's promptness in its use of CDBG funds substantially exceeds that of many other Connecticut grantees.

Affirmatively Furthering Fair Housing

Observations

The City of Meriden has a Human Rights Advisory Board which provides recommendations on human rights issues in the community and monitors the activities of the City. The Human Rights Advocate is empowered by ordinance to investigate, arbitrate and/or enforce when necessary any complaints or instances of housing discrimination or other types of discrimination.

Meriden allocated CDBG funds to the Department of Law to prosecute major housing code violators and to investigate fair housing and other complaints. The City reports that during Program Year 2008, 149 residents inquired of or registered complaints with the Law Department as follows:

- 22 - eviction procedures,
- 27 - financial issues, such as, heat, security deposits, housing repairs and rent increases,
- 16 - landlord/tenant problems,
- 5 - housing and disabilities,
- 18 - foreclosure,
- 5 - human rights,
- 1 - housing of family with children,
- 2 - elderly housing, and
- 4 - homelessness.

The Meriden Housing Authority completed the following activities related to affirmatively further fair housing:

- Carried out the modifications needed in public housing based on the Section 504 needs assessment for public housing,
- Affirmatively marketed to local non-profit agencies that assist families with disabilities,
- Affirmatively marketed to races/ethnicities shown to have disproportionate housing needs, and
- Counseled Section 8 tenants as to the location of units outside of areas of poverty.

We commend the City of Meriden for its success in affirmatively furthering fair housing.

Recommendations

We anticipate that in the next Consolidated Annual Performance and Evaluation Report (CAPER), the City will report on the activities of the Human Rights Advisory Board as well as the City to include data on the number receiving services and program outcomes.

Also, we advise the City to consider other impediments to fair housing choice such as the access to services and housing for persons with Limited English Proficiency. We anticipate that Meriden will consider actions to address these impediments when it develops the next Annual Action Plan and that it will report on actions taken in the succeeding CAPER.

Areas of Concern and/or Consideration

In Program Year 2008, Meriden spent \$446,265 in CDBG entitlement and program income funds on projects and activities to reduce slum and blight. This includes \$250,000 for code enforcement staff and miscellaneous expenses, \$84,000 for a program to clean up litter and remove graffiti at City-owned properties, \$62,265 to demolish an unsafe building, and \$50,000 for the Law Department that in part, prosecutes property owners who have been cited by code enforcement staff. The CAPER classifies all four activities as eligible code enforcement activities under 24 CFR 570.202(c).

We remind the City that the regulations at 24 CFR 570.202(c) require detailed records on the area designated for CDBG funded code enforcement activities. The area or areas must meet the criteria for a low- and moderate-income area or slum and blighted area benefit. Also, there must be clear and verifiable records that the area is in fact deteriorated or deteriorating and that the code enforcement activities "together with public or private improvements, rehabilitation, or services to be provided may be expected to arrest the decline of the area." Further, the Housing and Community Development Act of 1974 as amended [(42 U.S.C. 5301(c)] requires that CDBG funds not be used to substantially replace the amount of local financial support previously provided to community development activities.

Meriden's Program Year 2009 Action Plan provides that the City will now use CDBG funds to pay for 100% of the salary and benefits of 5 code enforcement inspectors, an increase of two full time positions above that in Program Year 2008. This appears to be the entire housing code enforcement inspection staff employed by the City.

As a result of our concerns about the CDBG funded code enforcement programs in Meriden, we will monitor this activity sometime in the current Federal Fiscal Year. Expenditures for code enforcement activities that are found to be ineligible may be disallowed with the requirement that the City reimburse its CDBG account from local funds.

Conclusion

We are rating our Connecticut grantees' overall performance in carrying out their programs as either satisfactory or unsatisfactory. This determination is based upon information available to this office, and does not reflect a comprehensive evaluation of specific activities. We have determined the City of Meriden's performance to be satisfactory. We further deem that Meriden has the continuing capacity to administer its programs.

If you have questions or would like to discuss any of these issues, please do not hesitate to me at (860) 240-9770 or John Post at (860) 240-9716.

Sincerely,



Gary Reisine
Director
Community Planning and Development

cc: Juliet Burdelski