



**U.S. Department of Housing and  
Urban Development**

Region X, Portland Field Office  
Office of Community Planning and Development

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March 21, 2023

Bradley Clark, Director  
Community Development Department  
City of Grants Pass  
101 NW A Street  
Grants Pass, OR 97526

Dear Mr. Clark:

**SUBJECT: Annual Performance Assessment**  
Program Year Dates: October 1, 2021 – September 30, 2022

The purpose of this correspondence is to transmit the results of the program review conducted by this office of the Community Development Block Grant (CDBG) and Community Development Block Grant CARES (CDBG-CV) programs covered by the City's 2021 Action Plan. This review examines information provided by the City through the Consolidated Annual Performance and Evaluation Report (CAPER) and the Integrated Disbursement Information System (IDIS). Through this performance review HUD combines the statutory and regulatory requirements for evaluating program progress; reviews program management; and determines whether the City has the continued capacity to effectively implement and administer the programs for which assistance is received.

In conducting this review, HUD examined the activities the City is undertaking for consistency with the priorities and objectives outlined in the Consolidated Plan. The scope of this analysis includes a review of the Consolidated Annual Performance and Evaluation Report (CAPER) for the past program year, as well as information obtained through program monitoring and audits. Also, we assessed whether progress has been made towards the regulatory goals identified in 24 CFR §91.1 of the consolidated plan regulations. The information that is supplied on program performance is examined for accuracy and compliance with contractual agreements and applicable laws. We also utilize this review to measure the level of progress that is being made.

Based on this analysis, we have determined that your overall progress is satisfactory. The activities undertaken are consistent with the HUD-approved Consolidated Plan and appear to be carried out in accordance program requirements. The City has the continuing capacity to administer CPD programs.

In accordance with 24 CFR §91.525, we are providing the City thirty days, upon receipt of this letter, to provide any comments to HUD. Any comments or requests for changes to this report will be taken into consideration by this office and a written response will be provided. If comments are not received within the period allowed, this report will be considered to be in final form. The final letter will then be made available to the public upon request.

We continue to appreciate the positive working relationship that the program staff maintains with this CPD office. We look forward to continuing to support your efforts to meet the goals of the consolidated plan. If you have any questions with respect to the enclosed comments or need technical assistance, please do not hesitate to contact Heather Gramp, Senior CPD Representative, at [Heather.M.Gramp@hud.gov](mailto:Heather.M.Gramp@hud.gov).

Sincerely,

Mark Mitchell, PhD  
Director, Office of Community  
Planning and Development

Enclosure

cc: Heather Gramp, HUD  
Anne Ingalls, City of Grants Pass  
JC Rowley, City of Grants Pass

**Annual Performance Assessment  
Grants Pass, Oregon  
2021 Program Year (October 1, 2021-September 30, 2022)**

**Consolidated Annual Performance and Evaluation Report (CAPER)**

Program Year End: September 30, 2022  
Report Due: December 29, 2022  
Report Received: December 16, 2022; updates/corrections February 6, March 7, March 21

2021 Funding Allocations Covered by CAPER (CDBG-CV and prior years funding not listed here):

Community Development Block Grant (CDBG): \$397,324

The Consolidated Annual Performance Report is found to be:

- Satisfactory  
 Errors/Corrections Noted

**CAPER Comments:** Based on HUD’s initial January 17, 2023 CAPER review letter providing feedback and inquiring about certain data points in the CAPER, the City made updates to the CAPER and responded to HUD on February 6, 2023. Further corrections to the PR-26 financial summary report were required, and the City responded again in IDIS on March 7, 2023. With these submissions, the City demonstrated that necessary corrections had been made and clarified areas where HUD had questions:

- For Goals, the City corrected the outputs to align the Goal Outcome Indicators to show that the Habitat for Humanity project is Public Facilities/Infrastructure for Low-Moderate Income Housing Benefit, and not Affordable Housing Acquisition.
- In the Resources and Investments section, the City updated the narrative to explain discrepancies between original Annual Action Plan programming for the allocation plus prior year resources, and the amount shown as spent; there were unliquidated prior year obligations drawn after the start of the PY 2021 (note that year-end invoice processing delays are routine and is always something to look for in the PR-07).
- The City corrected totals for the Affordable Housing section to reflect only eligible types as defined at 24 CFR 92.252 and 92.254 and consistent with the actual accomplishment reporting.
- The City updated the PR-26 Financial Summary report by:
  - Subtracting Public Services funded with 2019 or 2020 funds that were marked as being eligible and in support of responding to COVID-19, putting the City under the 15% cap.
  - Changing the prior adjustment lines for Administration figures to subtract funds drawn in October 2021 that were attributable to Program year 2021.

**Summary of Program Compliance**

The summary of compliance below includes information provided in the CAPER, as well as current information in various reports and grant management systems. This information not only provides an assessment of past compliance, but also provides information on upcoming deadlines to ensure grantees are aware of potential compliance issues.

**Community Development Block Grant Program**

- **Timeliness of Expenditures** [24 CFR §570.902]: Issue Identified

**Standard:** 60 days prior to the end of a grantee’s program year, the balance of funds in the grantee’s Line of Credit must not exceed

- 1) 1.5 times the entitlement grant amount for its current program year; and
- 2) 1.5 times the entitlement grant amount for its current program year, plus program income on hand, as reported in the Integrated Disbursement and Information System (IDIS).

**Accomplishments:**

Test Year	Grant Amount	Test Date	Unexpended Balance	Ratio
2022 (PY 21)	\$397,324	8/2/2022	\$1,023,537	2.58
2023 (PY 22) ( <i>Pending</i> )	\$375,906	8/3/2023	\$644,651	1.71*

\*As of March 20, 2023 as shown in a PR-56 timeliness test in IDIS.

**Additional HUD comments:** HUD sent the City a finding of non-compliance letter on August 25, 2022 reminding the City of the CDBG timeliness requirement and summarizing past years of untimeliness (2020, 2021 and 2022 were all untimely, although 2020 and 2021 were not acted on due to a COVID temporary waiver for untimeliness).

HUD notes that the City has made good progress during the past program year to implement stalled activities, accomplish its goals and become timely. If the City remains untimely for its PY 2022 test date on August 3, 2023, HUD will require a workout plan with accomplishment and draw milestones and regular reporting. Please also see the resource: [CDBG Timeliness and Best Practices to Achieve Timely Performance](#)

**Community Development Block Grant Program – CARES Act (CDBG-CV)**

- **Timeliness of Expenditures** [FR-6218-N-01]: Acceptable

**Standard:** Section III.B.7 of the CDBG-CV Implementation Notice published on August 20, 2020, established a six-year period of performance on CDBG-CV grants and imposed an “alternative requirement that each grantee must expend at least 80 percent of all CDBG-CV funds no later than the end of the third year of the period of performance established by the CDBG-CV grant agreement.”

**Accomplishments (as of 3/20/2023):**

Total CDBG-CV Award:	\$472,869
Expended to Date:	\$472,869
Percent Expended:	100%

## Other Program Requirements

- **Regulatory Caps:** Acceptable

Programs and Caps	Standard	Regulatory Requirement	Actual Expenditures	Actual %
PY 2021 CDBG planning/admin cap	≤ 20% of grant award + PI (annual)	570.200(g)(2)	\$60,696.26	15.28%
PY 2021 CDBG public service cap	≤ 15% of grant award	570.201(e)(1)	\$56,152.77	14.13%
Overall CDBG-CV grant planning/admin cap	≤ 20% of grant award	FR-6218-N-01	\$5.13	0%
CDBG Origin Year 2021 Planning/admin cap	≤ 20% of grant award (life of grant)	570.200(g)(1)	\$74,215.60*	18.68%
CDBG Origin Year 2020 Planning/admin cap	≤ 20% of grant award (life of grant)	570.200(g)(1)	\$21,702	5.79%
CDBG Origin Year 2019 Planning/Admin cap	≤ 20% of grant award (life of grant)	570.200(g)(1)	\$33,000	9.45%

\*Amount to date; activity #76 in IDIS open with additional \$5,249.40 from 2021 allocation funded.

**Additional HUD comments:** As of March 20, 2023, the PR-26 Activity Summary Report shows that the City has committed \$75,181 (20%) from PY 2022 funds toward Administration, with no draws to date. This is IDIS activity #106.

- **Monitoring/Audit**

**Open Monitoring Findings:** None. All Findings from the FY 2021 monitoring are closed.

**Open Audit Findings:** None

### Additional resources:

To assist the City manage its programs, we are providing the resource links below:

- **List of IDIS Online Reports**  
<https://www.hudexchange.info/resource/2533/idis-online-reports-user-guide/>
- **CPD Cross-Program Funding Matrix and Dashboard Reports**  
 These reports provide funding information for each jurisdiction that receives CPD program funds. The reports detail the size of each grant received over the past several years as well as the total amount of funds currently available to be spent on affordable housing and community and economic development activities.  
<https://www.hudexchange.info/programs/cpd-cross-program-funding-matrix-and-dashboard-reports/>