

To: The Honorable Urban Renewal Agency

Cc: April Capone Almon, Mayor
Paul J. Hongo, Jr., Deputy Director of Town Affairs

From: Tara Pisaturo, Community Development Coordinator

Date: July 6, 2009

Re: Small Cities Community Development Block Grant Eligibility Criteria and Application Process

Hi Everyone.

As you recall, at our last meeting on June 30, 2009 we had a lengthy discussion regarding the housing rehabilitation waiting list, the selection process and the application process as it pertains to determining eligibility.

A few of you had concerns, and in some cases raised specific doubt about the validity of some of the residents seeking funds. This was based on your personal knowledge of them and their individual family circumstances.

As a result, I had my own concerns about whether or not we as an agency should be engaging in this type of discussion – my fear is it may cloud our judgment, and in doing so deviate us from standard protocol when making a decision about an applicant's request for funds; not to mention putting the program at potential risk.

I spoke to Paul Hongo and shared my concerns with him. He suggested we call our Consultant, Larry Wagner and ask him to please review the eligibility criteria and selection process. Mr. Wagner confirmed to Paul and I that DECD and HUD eligibility regulations for determining participation in the housing rehabilitation program is based on income guidelines and reasonable housing modifications. In order to maintain our eligibility status, continue operating the program and receive future funding, the Town of East Haven must adhere to the following regulations set forth by DECD, HUD and East Haven's Fair Housing Plan:

Applicants must comply with the following eligibility criteria:

- ✓ Property must be located in East Haven.
- ✓ The occupants' income levels must not exceed income limits as established by HUD. Income limits are subject to annual updates by HUD.
- ✓ The property must have sufficient equity (can't have more than seventy percent (70%) spent). **This requirement is imposed by L. Wagner and Associates. DECD allows projects to go forth without adequate equity in emergency situations.**
- ✓ All properties built prior to 1975 must be tested for lead.
- ✓ Title searches are conducted on all applications to find out if there are any outstanding liens on the property. Although properties may have a lien, they may still be eligible for funds.
- ✓ All occupants must be current on mortgage and tax payments for personal property.
- ✓ Please note that DECD **does not impose CAPS** on housing rehabilitation projects, as long as all criteria are met in accordance with the regulations.

The East Haven Housing Plan must comply with the following:

- ✓ Title VI of the Civil rights Act of 1964.
- ✓ The Fair Housing Act – Title VIII of the Civil Rights Act of 1968, as amended.
- ✓ Executive Order 11063, as amended by Executive Order 12259.
- ✓ Section 104(b) of Title I of Housing and Community Development Act (HCDA) of 1974, as amended.
- ✓ Section 109 of Title I HCDA of 1968, as amended.
- ✓ Sections 503 and 504 of the Rehabilitation Act of 1973, as amended.
- ✓ The Americans with Disabilities Act of 1990.
- ✓ The Age Discrimination Act of 1975, as amended.
- ✓ Executive Order 11246 (as amended by Executive Orders 12375 and 12086) Equal Opportunity under HUD and HUD-assisted Construction Contracts.
- ✓ Executive Order 12892, Leadership and Coordination of Fair Housing.
- ✓ CGS 46a-64c as amended.

Furthermore, the Town commits to providing racial and economic integration in any housing development or financially supported project(s) with DECD funding and will take affirmative action steps to reach beneficiaries from all racial and ethnic groups, as well as physically and mentally handicapped families with children, and to reach a broad range of income eligible beneficiaries for appropriate and applicable housing opportunities.

I believe it is also important to note that the Mayor, in accordance with the Assistance Agreement between the Town of East Haven and DECD (which was approved by our Town Council), and acting as the CEO of the Municipality, has the authority to approve or not approve projects. (Although Mayor Capone Almon may have the final say, she

has expressed that she values and respects the Commissioners' opinions and will follow their lead when it comes to approving projects.)

Please also remember the Town follows the stringent guidelines imposed by DECD, which require the Town to ensure the applicants are income qualified and the repairs are within the purview of DECD and HUD regulations (e.g. Repairs are done to eliminate blight, to make properties safe and livable, and to restore value to the community in which the applicants reside. Repairs cannot be done for aesthetic purposes only).

If you would like, Larry Wagner is willing to attend an upcoming meeting so he can speak to us at length about the eligibility criteria, the application process, and any other questions or concerns you may have about East Haven's Housing Rehabilitation Program.

In closing, the Town of East Haven has participated in the State's rehabilitation program for over 35 years. The Urban Renewal Agency's Commissioners, past and present have done an outstanding job ensuring the highest quality of service, of operating within the rules and regulations, and most of all, maintaining the Program's integrity – I just want to make certain I do everything I can to help us stay the course.

Thank you for your time, and for listening to my concerns.

Kind Regards,

Tara Pisaturo, MPA
Community Development Coordinator