

# **TOWNSHIP OF LOWER MERION**

## ***Grants and Community Development Committee***

### **Issue Briefing**

**Topic:** CDBG's Assessment of Fair Housing Report Requirement

**Prepared By:** Kathryn Morris, Community Development Technician

**Date:** September 29, 2017

**I. Action to Be Considered by The Board:**

Authorization to enter into a collaboration agreement with Montgomery County's Office of Housing and Community Development to produce a regional Assessment of Fair Housing (AFH) report required by HUD.

**II. Why This Issue Requires Board Consideration:**

The Lower Merion Township CDBG program requires staff to obtain approval from the Board of Commissioners when entering into a regional agreement.

**III. Current Policy or Practice (If Applicable): N/A**

**IV. Other Relevant Background Information:**

In 2015, HUD replaced the 2012 Analysis of Impediments Report requirements with a new (AFH) program. This program establishes a new, more comprehensive reporting requirement for federal entitlement communities. Compliance with this new program is best accomplished working regionally with Montgomery County and will involve entering into an agreement with the County and contribute our share of CDBG funds to pay for the consultant.

The Township's share of the cost for this agreement will not exceed \$7,500. The expense could be less once Montgomery County determines how many additional municipalities will be entering into this contract.

Program participants will be accountable for any applicable analysis and any applicable goals and priorities included in the submitted AFH. Triad Associates is the consultants selected by Montgomery County. Triad is also the Township's CDBG program consultant.

The primary goal of HUD is to reduce housing discrimination, affirmatively further fair housing through Community Planning and Development programs and promote diverse, inclusive communities. For the purpose of the new HUD rule (24CFR5.158), community participation means a solicitation of views and recommendations from members of the community (focus groups) and other interested parties, a

consideration of the views and recommendations received, and a process for incorporating such views and recommendations into decisions and outcomes. Staff contacted Triad to determine the cost if the Township entered into a separate agreement with Triad. Triad verbally informed staff the cost would be two to three times the cost of the regional agreement due to the need to repeat much of the language included in the regional agreement.

**V. Impact on Township Finances:**

There is no impact to the Township's finances. All funds for this contract will be paid from the CDBG budget.

**VI. Staff Recommendation:**

Staff recommends that the Board of Commissioners authorize entering into the collaboration agreement with Montgomery County.