

CHERRY HILL TOWNSHIP

COMMUNITY
DEVELOPMENT
BLOCK
GRANT

2020 DRAFT CONSOLIDATED ACTION PLAN
EVALUATION REPORT (CAPER)

Cherry Hill Township
Department of Community Development
820 Mercer Street
Cherry Hill, New Jersey 08002

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan.

91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

This Consolidated Annual Performance and Evaluation Report (CAPER) describes the activities undertaken during the program year beginning July 1, 2020 and ending June 30, 2021 using Federal funds granted to the Township of Cherry Hill by the U.S. Department of Housing and Urban Development (HUD) under the Community Development Block Grant (CDBG) program. Activities and accomplishments described in this report primarily benefit low-income and moderate-income residents of the Township of Cherry Hill, neighborhoods with high concentrations of low-income and moderate-income residents, and the municipality as a whole.

A complete draft of this report was made available for public review and comment for a 15-day period beginning September 14, 2021 and ending September 28, 2021. The availability of the report was publicly advertised consistent with the provisions of the Cherry Hill Township Citizen Participation Plan. The complete document is available for review at the Department of Community Development, and the Office of the Township Clerk.

The global coronavirus pandemic continued to adversely impact the implementation of many planned activities throughout the entire 2020 program year, however Cherry Hill was able to make progress on meeting CDBG goals for the year. As noted below, the "regular" CDBG activities were also augmented by special Covid-response activities using designated CARES Act funding. Much of the Township work this year was administrative and project delivery focused, including setting up Rental/Mortgage Assistance Programs and a Non-Profit Grant Program to prepare for, prevent and respond to coronavirus. Housing activities became extremely difficult to carry out because of COVID-related restrictions.

Administrative expenditures were below the maximum 20 percent (20%) allowed under CDBG regulations for both the CDBG Entitlement Grant (17.67%) and the CDBG-CV Grant (.70%). Program administration and Planning Activities were primarily focused on redesigning the Township approach to housing activities; developing activities to prepare for, prevent and respond to coronavirus; completing the Action Plan process as well as the CV amendment processes; and ensuring program compliance with HUD regulations.

The PR-26 shows that no public service expenditures were made in the 2020 program year. This occurred due to the coronavirus restrictions, as public participation in many things was limited or non-existent. In the Township's 2020 Annual Action Plan, public service dollars were intended for the Senior Bus program; however, due to COVID the Senior Bus did not run for the majority of the program year but has now resumed. In addition, the work of the Side by Side Domestic Violence Team was delayed by

COVID, but was able to resume during the program year. We anticipate drawing down for those public services programs soon. Lastly, a significant portion of the Township's CV funding was budgeted to support public services through grants to Non-Profits. The Township staff spent time on the development of the parameters of the grants, the application and the process of applying/reviewing the grants. These funds have been awarded and we anticipate drawing them down soon.

The accomplishment numbers reported below are taken from an evaluation of each individual activity completed during the 2020 Program Year rather than from the PR-23 report, which is often inaccurate.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Administration	Administration	CDBG: \$	Other	Other	1	1	100.00%			
Area Benefit Eligible Public Facilities	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	25	0	0.00%	5	0	0.00%
Handy Helper	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	200	0	0.00%	65	0	0.00%
Housing Activities	Affordable Housing	CDBG: \$	Homeowner Housing Added	Household Housing Unit	5	0	0.00%	1	0	0.00%
Modest Priced Housing	Affordable Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	15	0	0.00%	3	0	0.00%
Planning	Planning	CDBG: \$	Other	Other	1	1	100.00%			
Public Facilities	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	25	0	0.00%	5	4185	83,700.00%

Removal of Architectural Barriers	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	125	0	0.00%	8000	0	0.00%
Senior Bus	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	13258	0	0.00%	2651	0	0.00%
Side By Side Domestic Violence Response Team	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	112	0	0.00%	28	0	0.00%
Single Family Housing Rehabilitation	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	15	1	6.67%	5	3	60.00%
Support public services	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	100	0	0.00%			

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

Funds spent during 2020 addressed high priority needs identified in the 2020-2024 Consolidated Plan, specifically the needs for housing and public facility improvements. In addition, the administration and planning funds spent were on planning and administrative activities, keeping the program moving forward during the coronavirus pandemic and being poised to meet increased community need once coronavirus restrictions lifted enough to allow implementation to increase.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG
White	3,168
Black or African American	183
Asian	289
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	545
Total	4,185
Hispanic	399
Not Hispanic	3,786

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

Data reported above was compiled from individual PR-03 activity reports rather than the PR-23 report, which is often inaccurate. The "Native Hawaiian or Other Pacific Islander" category is actually those who identified themselves as "Other multi-racial."

The numbers clearly show that the Township's Community Development Program benefits a diverse cross-section of the Township's population.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	1,704,486	91,414

Table 3 - Resources Made Available

Narrative

The totals above include \$831,585 in CDBG-CV funds allocated to the Township as well as \$5,796.82 in CDBG-CV funds dispersed by the Township. "Regular" CDBG funds spent during 2020 totaled \$85,616.76.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
EXCEPTION AREA/UPPER QUARTILE	10	0	

Table 4 – Identify the geographic distribution and location of investments

Narrative

Township funds were spent on housing, slum/blight and planning/administration activities for CDBG and CDBG-CV. These activities were all Township wide. Much of the Township's regular CDBG activity was restricted due to COVID restrictions, including the projects planned for the Exception Area/Upper Quartile.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

The Township also leverages federal funding through its own local resources and encourages service providers to seek private funding for social services as well. With the exception of housing rehab, creation of new affordable homeowner housing and administration, Cherry Hill does not serve as the sole source of funding for any of its recipients/partners. All of the social service providers have various streams of funding available to them and in many cases the funding received from the CDBG program represents a small portion of their overall budget. The list below represents the funding sources available to the social service providers and housing activities.

Social Service Providers:

- Jewish Federation of Southern New Jersey: JFED was an applicant for a 160-unit affordable housing senior and supportive needs development that received 2018 Low-Income Housing Tax Credits (LIHTCs), Camden County HOME Funds and Township Affordable Housing Trust Funds (AHTFs) for the project, in addition to the Federal Home Loan Bank of NY.
- **ARHAT:** ARHAT continue to leverage funding to increase new affordable housing opportunities through buy-down programs through the use of CDBG funds, as well as AHTF dollars.

Housing Activity Funds:

- Camden County Consortium HOME Investment Partnerships Program (HOME)
- Delaware Valley Regional Planning Commission (DVRPC) Transportation & Community Development Initiative (TCDI)
- **State HOME funds**
- Low Income Housing Tax Credits (LIHTC)
- New Jersey Housing & Mortgage Finance Agency
- New Jersey Department of Community Affairs

- New Jersey Economic Development Authority

- Cherry Hill Affordable Housing Trust Fund

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	117	3
Number of Special-Needs households to be provided affordable housing units	0	0
Total	117	3

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	43	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	73	3
Number of households supported through Acquisition of Existing Units	1	0
Total	117	3

Table 6 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

Although the Township typically meets their Annual Plan Goals, this year progress was difficult due to the coronavirus pandemic severely hampering residential rehabs due to COVID restrictions and housing acquisition due to a challenging real estate market. In addition, typical Township public services were also hampered due to COVID restrictions. The Township staff continued to work hard to ensure these programs were poised for launch once conditions changed and communicate the program status to members of the public.

Discuss how these outcomes will impact future annual action plans.

These outcomes, although limited, have poised the Township for effectively moving implementation forward in the 2021 Program Year. The Township has launched both a COVID-related Rental/Mortgage Assistance Program and a Nonprofit Grant Program that will run through the 2021 Program Year. The Township expects that public services will resume and that residential rehabs will resume at a slightly higher rate due to active waitlists. Township focus will be on implementing CV programs and affordable housing, in order to meet increased community needs.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	0	0
Low-income	0	0
Moderate-income	3	0
Total	3	0

Table 7 – Number of Households Served

Narrative Information

Accomplishments to date are reported by PR-03 Activity Summary, which include CDBG Beneficiaries by Income Category for housing and non-housing based on expenditures during the program year. The only housing-related expenditures this year were for Single Family Rehab projects.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Addressing the emergency shelter and transitional housing needs of homeless persons

The Camden County Continuum of Care (CoC) and Camden County HOME Consortium conduct homeless needs assessments and planning for the entire County. Cherry Hill Township plans to participate with the County CoC and HOME Consortium by coordinating and leveraging our resources with the County to support and provide affordable housing, rental assistance, utility assistance, disability assistance (including veterans), domestic violence assistance and shelter referrals, and other services as needed by the County. The Township's Housing Coordinator acts as a resource to provide regional and statewide information on emergency housing needs of homeless persons or persons at risk of becoming homeless.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The Township, as noted in the 2020-2024 5-Year Consolidated Plan, expended CDBG funds to assist the Side by Side Program, a support network for victims of domestic abuse. Victims matched with a counselor who guides them through the process from one point of the initial incident through any legal process.

In PY2020, the Township of Cherry Hill provided financial support to a number of activities that assist low income people to prevent homelessness, including the following:

1. Housing Rehabilitation for low- and moderate-income homeowners to assist them in maintaining their property and remain a property owner in a safe and code free unit.
2. Continued financial support for the Side by Side Program and for the Senior Bus Program. These programs were suspended for the majority of the 2020 Program Year due to the coronavirus pandemic.

Helping homeless persons (especially chronically homeless individuals and families, families

with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The Township, as noted in the 5-Year Consolidated Plan, designated CDBG funds to support homeless people in abusive situations by funding the Side by Side Program, a support network for victims of domestic abuse. Victims matched with a counselor who guides them through the process from one point of the initial incident through any legal process.

In addition, the Township designated funds for the Senior Bus Program in PY2020, typically serving approximately 4,800 elderly, disabled and low-income people.

Both of these programs were suspended for the majority of the 2020 Program Year due to COVID restrictions.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

The Township of Cherry Hill does not have a Public Housing Authority, nor does it have any conventional public housing complexes.

The Township is aware of the Camden County's Public Housing Office's activities and reviewed a copy of the Office's Streamlined 5-Year Plan in preparing the 2020-2024 Consolidated Plan and 2020 Annual Action Plan.

Actions taken to encourage public housing residents to become more involved in management and participate in homeownership

While not specific to public housing tenants/residents, the Township strives to provide affordable housing opportunities to further stabilize household and family income in the hopes that renters will move towards investment in homeownership. In fact, many of the tenants within the Township's housing programs, such as ARHAT, have moved towards affordable housing homeownership opportunities in the Township's R5, MPH and new construction inclusionary developments, as a result of the affordable rents offered by many of the programs supported financially and otherwise by Cherry Hill Township.

Actions taken to provide assistance to troubled PHAs

The Township does not have a Public Housing Authority (PHA). There are no troubled PHAs within the Township.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

The State of New Jersey has a constitutional obligation to provide affordable housing and Cherry Hill Township received a Third Round Judgment of Repose from the Superior Court of NJ - Camden County in 2016. The Township is implementing its Housing Element of its Master Plan to provide maintain, build and rehabilitate 2,829 affordable housing units between now and 2025. To the extent that land use controls or growth limitations would otherwise have negative effects on providing affordable housing, the Township has engaged in a series of redevelopment and zoning overlay initiatives to create 500+ NEW affordable housing unit opportunities between 2015 and 2025. Affordable housing opportunities are also captured through the collection of Housing Impact Fees and Non-Residential Development fees, which are used towards the Township's housing improvement program, as well for other funding mechanisms (such as subsidies for market-to-affordable and 100% inclusionary developments).

In conjunction with new construction, the Township has a widely successful intermediate (Handy Helper) and extensive (Housing Improvement Program), whose purpose is to rehabilitate homes owned by low- and moderate-income populations. In addition to the reduced tax assessment given to deed-restricted units (State statute), the Township also uses an abatement program for all homeowners who have homes 20 years or older. This abatement encourages homeowners to invest in their homes, without being unduly taxed (for five years) for the improvements made to their property. Building code compliance and property maintenance provisions have been strengthened through local legislation, which requires all vacant and abandoned properties to register with the Township. All of these initiatives, in tandem, work to encourage residential investment and its ultimate return.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

The Township's challenge of meeting the needs of the underserved and facing the stark municipal budget constraints is similar to nearly every municipality in the State of New Jersey.

In addition, the impacts of the coronavirus pandemic have increased the obstacles to providing public services and creating/maintaining affordable housing. Furthermore, the needs of many families, including the already underserved, only increased during the pandemic as unemployment soared. The Township made a concerted effort to listen and understand the needs of the community and ensure that the Township CDBG Annual Funds and CV funds were responsive to those needs. This includes prioritizing affordable housing production/maintenance, rental/mortgage assistance programs and working with local social service agencies to increase the support for crucial public services in the Township.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

Cherry Hill requires the use of lead-safe practices and other actions aimed at preventing lead poisoning. Contractors performing renovation, repair and painting projects that disturb lead-based paint in homes, child care facilities, and schools built before 1978 must be certified and must follow specific work practices to prevent lead contamination. Under the CDBG rehabilitation programs, lead-safe practices have been underway.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

Anti-poverty Strategy. Cherry Hill provided CDBG funds to a variety of anti-poverty programs that will assist low- and moderate-income residents in 2020. These programs were a priority for the Township with the previous Consolidated Plan as implemented over the past five years, will continue to be priorities as identified in the 2020-2024 Consolidated Plan:

- Transportation for senior and disabled residents;
- Advocacy for the needs of the disabled;
- Advocacy for victims of domestic violence;
- The Single-Family Rehabilitation Loan Program; and
- The ARHAT Program to provide affordable rental housing to low and moderate-income households

One of the most important tools in reducing poverty is to decrease the cost of housing. High housing costs reduce the ability of families to pay for other essential needs, such as food, clothing, and education.

The Township and County anti-poverty strategies are linked to the Economic Programs that have been implemented and operated for several years. The objective of poverty reduction requires programming for broad areas including job training and placement, public services, education, and basic skills development

In addition to the Township's ongoing Anti-Poverty work, the COVID-19 Rental and Mortgage Assistance Program and Non-Profit Grants Program are both designed to continue to meet the growing need for anti-poverty resources during the coronavirus pandemic.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

The Cherry Hill Township Department of Community Development is the administrative agency for the Cherry Hill Township CDBG programs. As part of this responsibility, the Department of Community Development reviewed and monitored the performance of sub-recipients like Camden County Home Improvement Program (HIP) for overall program delivery structure to ensure coordination and compliance.

As the entitlement grantee for the CDBG program, the Department of Community Development is the lead agency for the development of this 5-Year Consolidated Plan, as well as the Annual Action Plans that outline the proposed activities and expenditures under these programs, and the Consolidated Annual Performance & Evaluation Reports (CAPERs). The Department oversees planning, community development, housing, lead paint abatement, and various programs for the Township.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

The Township implemented the following strategies and actions during PY2020 to address identified obstacles to meeting underserved needs:

Developed new programs to address increased COVID-19 related needs;

Explored funding opportunities from federal, state, and private resources to address needs of the underserved;

Leveraged resources to better match resources to needs;

Worked with the Department Public Works and Engineering to implement criteria when assessing CIP projects to better serve low- and moderate-income communities;

Continue to prioritize services to the elderly and special needs populations through the Handy Helper and Single-Family Owner-Occupied Housing Rehabilitation Program; and

Provided bilingual staff and developed translated materials in as many interactions with low- and moderate-income individuals as possible.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

Cherry Hill Township continues to take the following actions to address traditional and emerging barriers to affordable housing.

- Affordability:

Affordable old housing stock in Cherry Hill Township is available, though higher property taxes will prevent many low-income families from becoming homeowners, and high market rate rental costs and a shortage of affordable rental units in the Township all contribute to a lack of affordability. The municipality has not raised taxes in nearly a decade to offset tax increases from other entities such as the state, county, and school district. The Township has also adopted an updated Housing Plan identifying potential locations for new affordable housing opportunities, adopted redevelopment plans

that have included nearly 200 new affordable housing units that are currently under construction or soon to be, and we have continued to use CDBG funds to purchase and rehabilitate existing condominiums in Cherry Hill to rent to low and moderate income families.

The affordability of both owner occupied and rental housing remain the highest priority needs.

- Homeownership:

The Township has taken steps to promote homeownership throughout Cherry Hill Township by advocating the use of first time home buyer programs provided through the New Jersey Housing and Mortgage Finance Agency and the Camden County Department of Community Development. All of these programs offer equal homeownership opportunities to everyone.

- Rental Units:

The Township continues to support our local non-profit, Affordable Rental Housing at Tavistock (ARHAT), by managing the rental of all units, as well as the acquisition of new units. We have also adopted affordable and inclusionary housing ordinances to ensure that all new home construction for sale and rent includes either moderately priced housing units or affordable rental units.

- Accessibility:

The Township's Ombudsman for Disabled Citizens addresses issues regarding housing as well as many other barriers for the disabled. The Township is in favor of universal design homes.

The Township's road program has sought to improve accessibility within our neighborhoods by systematically upgrading roads and intersections to be ADA compliant, allowing safe access around those neighborhoods for our disabled and elderly residents. We have also provided services such as our Handy Helper program that provides small grants to elderly residents to make their homes more accessible by upgrading railings, installing ramps, and other such accessibility improvements.

- Homelessness:

The Township through the HOME Consortium is funding many agencies that help to address and prevent homelessness.

- General Fair Housing Issues:

Cherry Hill has seen a change in the racial makeup of our community over the last 10 years. We are becoming a more diverse community and the Township is doing all it can to celebrate that diversity and ensure that Cherry Hill remains a place where all people have access to safe and affordable housing opportunities. Our affordable housing ordinance includes the requirement to create an affirmative marketing plan to be sure that advertisement of our new, affordable units are reaching out to all

members of our communities. It includes a targeted approach that seeks to reach those members of our communities that are least likely to apply.

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The Township's standards and procedures for compliance monitoring are designed to ensure that:

- 1) objectives of the National Affordable Housing Act are met, and
- 2) program activities are progressing in compliance with the specifications and schedule for each program, and
- 3) recipients are in compliance with other applicable laws, implementing regulations, and with the requirements to affirmatively further fair housing and minimize displacement of low-income households.

The Township continued to carry out monitoring activities and internal audits to ensure that it complies with all HUD and CDBG program requirements. The Community Development Department of the Township of Cherry Hill was the designated Lead Agency for the preparation, submission, implementation, and monitoring of the 2020 Annual Action Plan, which covered the period July 1, 2020 to June 30, 2021 and for this Comprehensive Annual Performance and Evaluation Report (CAPER), which covers the same time period.

The Township of Cherry Hill has followed the procedures and requirements published by HUD. The Township recognized that the preparation of the 2020 Annual Action Plan required discussion and consultation with many diverse groups, organizations, and agencies. During the preparation of the 2020-2024 Consolidated Plan and the 2020 Action Plan, the township established a comprehensive list of stakeholders, which was used to solicit information on existing social, health care and housing programs and to discuss future strategies. The Township has continued to solicit input from these organizations. The stakeholders consisted of local citizens, non-profit social service agencies, housing providers, and county and municipal planning and social service entities. Additionally, the Township has sought citizen participation and made all materials readily available to the public for review and comment.

The Township worked closely with particular entities in the execution and monitoring of the programs described in the Action Plan and an expanded list of agencies that have partnered to address the impacts of the coronavirus pandemic. The principal organizations, their particular roles, and the relationship they have with the Township are described in the Institutional Structure section of the 2020 Action Plan and will be reported as the Township reports on CV funding.

Action Plan activities were monitored through the use of checklists and forms to facilitate uniform

monitoring.

Fiscal monitoring included review and approval of budgets, compliance with Grant Agreements, approval of vouchers and reviews of fiscal reports and sub-recipient audits.

Monitoring of sub-recipients occurred through regular telephone and on-site monitoring visits.

Minority Business Outreach - The Township encourages participation by minority-owned businesses in CDBG assisted activities and maintains records concerning the participation of minority-owned and women-owned businesses to assess the results of its efforts and to complete the semiannual "Minority Business Enterprise Report" to HUD. Qualified minority contractor are encouraged to bid on properties participating in the Housing Rehabilitation Program.

Comprehensive Planning Requirements - To ensure compliance with the comprehensive planning requirements of the Consolidated Plan process, the Township reviews the process on an ongoing basis. The review ensures compliance with federal requirements concerning citizen participation and consistency of actions taken with those specified in the "Citizen Participation Plan." Records documenting actions taken are maintained for each program year.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The Township of Cherry Hill placed the CAPER document on public display for a period in excess of the required 15 days from September 14, 2021 through September 28, 2021. The draft CAPER was put on public display on the Township's website and the public notice was both posted on the website and in the local paper, *The Courier*.

A copy of the advertisement is provided as an attachment to this report.

No comments from the public were received during the comment period.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

Ongoing assessments of community needs and ongoing successes of the Township's CDBG program in addressing those needs suggest that no significant changes are needed in the program's objectives. While always aware of opportunities to improve, the Township believes that the overall direction and implementation of its CDBG program meet both the requirements of the federal government and the needs of our local residents.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

CR-45 - CDBG 91.520(c)

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Ongoing assessments of community needs and ongoing successes of the Township's CDBG program in addressing those needs suggest that no significant changes are needed in the program's objectives. While always aware of opportunities to improve, the Township believes that the overall direction and implementation of its CDBG program meet both the requirements of the federal government and the needs of our local residents.

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