



**U.S. Department of Housing and Urban Development**  
Houston Field Office, Region VI  
Office of Community Planning & Development  
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September 28, 2021

Alsie Bond, Manager  
Community Development Services Department  
City of Bryan  
P.O. Box 1000  
Bryan, TX 77805

Dear Ms. Bond:

Subject: End of Year Assessment Letter for Program Year (PY) 2019  
October 1, 2019, through September 30, 2020

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 require the Secretary of Housing and Urban Development (HUD) to determine annually that the grant recipient follows these statutes and has the continuing capacity to carry out the programs for which it receives funds. One of the documents used to conduct the assessment is the Consolidated Annual Performance and Evaluation Report (CAPER). CAPERs are due within 90 days of the end of a grantee's program year in accordance with 24 CFR 91.520(a). For the City of Bryan, the due date for the 2019 CAPER would have been December 29, 2020. Due to the pandemic, HUD made available a waiver allowing grantees 180 days to submit their CAPER. The City of Bryan utilized making their due date March 29, 2021. Bryan's CAPER was officially received electronically through the Integrated Disbursement and Information Systems (IDIS) eCon Planning Suite on March 25, 2021. The report was timely and received within 180 days of the end of the City's program year in accordance with the waiver of 24 CFR 91.520(a).

The end of year assessment provides the basis for working together collaboratively to achieve the community's goals as well as meeting the mandates of the statutes. It includes a review of the City's planning process, its management of funds and its progress in carrying out the strategies and goals identified in the Consolidated Plan. Compliance with statutory and regulatory requirements, accuracy of required performance reports and evaluation of accomplishments in meeting key departmental objectives are also evaluated. In addition, the CAPER is reviewed in conjunction with the Office of Fair Housing and Equal Opportunity (FHEO) to confirm there are no issues of noncompliance with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, Executive Order 11063, the Age Discrimination Act of 1975 and Section 3 of the Housing and Urban Development Act of 1968 and all regulations promulgated under such statutes and authorities. FHEO has requested that the City of Bryan provide a copy of its updated analysis of impediments to their office.

FHEO also requested that the City's future public notices related to public hearings include information regarding availability/provision of translation services for those with limited English proficiency (LEP), availability of communication devices for visually or hearing impaired and indication that the venues associated with the citizen participation process are fully accessible to persons with disabilities.

In concert with the CAPER, IDIS based reports are reviewed to validate the information. The reports include but are not limited to the CDBG Activity Summary Report (GPR) for the Program Year 2019 (PR03), the CDBG Financial Summary Report (PR26), the 60-day Ratio Report (PR56) and the HOME Deadline Compliance Status Report. These documents reflect whether a grantee is spending timely and meeting regulatory and statutory requirements and are excellent tools for a grantee to conduct self-assessments. Program Year 2019 was the fifth year of the City's five year, October 1, 2015, through September 30, 2020, Consolidated Plan. For Program Year 2019, the City received \$848,059 in Community Development Block Grant (CDBG) funds, \$339,499 in Home Investment Partnerships (HOME) funds.

The PR03 report reflects CDBG activities undertaken by the city during the program year. The information includes details of projects and activities, the amount of funding allocated per project and activity and how much has been spent and how many persons have benefitted from the activity. A review of the 71-page PR03 as of March 4, 2021, reflected that of the 34 activities in progress during the year, 21 were in a completed status and 12 were underway, including two projects utilizing CARES Act funding. One activity, the summer parks program, was canceled due to the pandemic. City is commended on their successful performance during this most recent program year.

The PR26 report reflects CDBG spending during the program year including the percentage of funds benefitting low to moderate income residents and obligated for public services and administration and planning activities. The statutory requirement for overall benefit to low- and moderate-income persons is 70 percent. Bryan's PR26 for PY 19 reflected a 100.00% benefit to low- and moderate-income persons. The percentage of funds obligated for public service activities was 10.22% of the grant amount, and the percentage of funds obligated for planning and administration were 19.92% of the grant amount. By regulation, the standard allowable limits are 15% and 20% respectively.

The PR56 report, also known as the Current 60 Day Ratio Report in IDIS documents timeliness of a CDBG grantee. HUD regulation at 24 CFR 570.902 requires CDBG grantees to spend their funds in a timely manner. A grantee is considered timely if 60 days prior to the end of their program year the balance of grant funds in its line of credit does not exceed 1.5 times the annual grant. A review of the PR56 reflected that Bryan met its timeliness ratio for Program Year 2019 with a .77 ratio on August 2, 2020.

Historically, participating jurisdictions compliance with the HOME program requirements has been assessed by reviewing HOME deadline compliance reports including commitments and disbursements. Beginning with FY 2015 HOME allocations, HUD ceased using the cumulative method for measuring compliance with the requirement that Participating Jurisdictions (PJs) commit HOME funds within 24 months of obligation.

Further, the Consolidated Appropriations Act of 2019 included a provision suspending the 24-month commitment requirement for CHDO set-aside funds, as well as continuing the suspension of the 24-month commitment requirement for regular HOME funds. Both deadline requirements were suspended through December 31, 2021.

The City of Bryan is congratulated on another successful program year. As a result of this office's assessment and the information provided in the PY 2019 CAPER, the following was determined:

- The city carried out its programs as described in its Consolidated and Annual Action Plan submissions,
- The Consolidated Plan submission as implemented, complied with requirements of the Housing and Community Development Act, as amended, and other applicable laws, and regulations.

This letter is to be shared with the public. You may provide copies to interested persons such as news media, members of local advisory committees, and citizens attending public hearings. We request that you also provide a copy of this letter to the Independent Public Accountant who performs the single audit of the City of Bryan. Please recognize that the comments and conclusions made in this letter are subject to a 30-day review and comment period by the city. We may revise this letter after consideration of the City of Bryan's views, and will make the letter, the City's comments, and any revisions available to the public within 30 days after receipt of the comments. Absent any comments by the city, this will be considered the final letter on this subject. Upon final approval, the CAPER will be available to the public on the HUD Exchange at: <https://www.hudexchange.info/consolidated-plan/con-plans-aaps-capers/>.

If you have any questions, please contact me at (713) 718-3279 or via email at [Stacia.L.Johnson@hud.gov](mailto:Stacia.L.Johnson@hud.gov) or the Community Planning and Development Representative for the City of Bryan, Christine Cuddeback, at (713) 718-3117 or via email at [christine.l.cuddeback@hud.gov](mailto:christine.l.cuddeback@hud.gov).

Sincerely,



Stacia L. Johnson, Director  
Community Planning and Development