

# U. S. Department of Housing and Urban Development



Community Planning and Development

Region VIII, Denver  
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December 10, 2020

Nicole Crutchfield, Director  
Planning and Development Department  
City of Fargo  
200 3rd Street North  
Fargo, North Dakota 58102

SUBJECT: 2019 Annual Community Assessment

Dear Ms. Crutchfield:

The U.S. Department of Housing and Urban Development (HUD), Region VIII, Office of Community Planning and Development (CPD) assesses the performance of its grant recipients on an annual basis. This assessment is based on the Consolidated Annual Performance and Evaluation Report (CAPER) submitted by you as a grant recipient, as well as information collected from other financial and performance reports, correspondence, and monitoring reports. This letter conveys the results of our evaluation for the 2019 program year.

Based on this analysis, we have determined that the City of Fargo has the continuing capacity to administer its CPD-funded programs. The activities undertaken are consistent with your HUD-approved Consolidated Plan, and as 2019 was the last year of the current Consolidated Plan, Fargo provided an attached "Assessment of Objectives and Accomplishments" outlining its progress in meeting its housing and community development goals.

<b>Goal</b>	<b>5-Year Goal</b>	<b>5-Year Actual Accomplishments</b>	<b>5-Year Percentage Met</b>
Affordable Housing	500 persons assisted with public facility other than LMH	247 persons assisted with public facility other than LMH	49%
Affordable Housing	500 persons assisted with public service other than LMH	540 persons assisted with public service other than LMH	108%
Affordable Housing	144 rental units constructed	6 rental units constructed	4%
Affordable Housing	13 rental units rehabilitated	13 rental units rehabilitated	100%
Affordable Housing	4 homeowner housing added	0 homeowner housing added	0%

Affordable Housing	75 homeowner housing rehabilitated	59 homeowner housing rehabilitated	78%
Homelessness	1300 persons assisted with public facility other than LMH	1400 persons assisted with public facility other than LMH	108%
Homelessness	9705 Homeless Person Overnight Shelter	4299 Homeless Person Overnight Shelter	44%
Homelessness	1100 person assisted with homelessness prevention	0 person assisted with homelessness prevention	0%
Homelessness	4 overnight/emergency housing beds added	2 overnight/emergency housing beds added	50%
Neighborhoods	6560 persons assisted with public facility other than LMH	6560 persons assisted with public facility other than LMH	100%
Neighborhoods	10 businesses façade treatment/rehabilitation	13 businesses façade treatment/rehabilitation	130%
Poverty Reduction	1385 persons assisted with public service other than LMH	2681 persons assisted with public service other than LMH	193%

For those projects not completed at the time of the CAPER reporting, Fargo provided the status of those projects and an estimated completion date in the “Assessment of Objectives and Accomplishments” attachment. It is noted there were several discrepancies in reported accomplishments in the CR-05 Table 2 “Accomplishments – Strategic Plan to Date” and the “Assessment of Objectives and Accomplishments” accomplishment table. The data reported in the above table was taken from Table 2 in the CAPER. If the accomplishments reported in the CR-05 tables are not correct, Fargo should update the accomplishments accordingly. Based on the CR-05, it does not appear that Fargo will meet all its housing and community development goals from the Consolidated Plan, but this may be due to inaccurate reporting. For future reference, Fargo has the option of amending its Consolidated Plan if analysis determines that five-year goals need to be revised.

Fargo’s CDBG program was monitored remotely in 2020 by this office and resulted in three Findings and one Concern. Two of the three Findings were minor in nature and this office provided Fargo with technical assistance regarding the third, and more concerning, Finding relating to lead-based paint requirements. Fargo closed out all the Findings in a timely manner.

Fargo has already been awarded its Community Development Block Grant Coronavirus (CDBG-CV) response funds for all rounds of funding. HUD appreciates the urgency Fargo placed on submitting its amendments to the 2019 Annual Action Plan and getting the funding out to the community to prevent, prepare for, and respond to the coronavirus.

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In accordance with the Consolidated Plan regulations described at 24 CFR §91.525, if the city has comments regarding our conclusions, please submit them to this office within 30 days of receipt of this letter. If we do not receive comments within the 30-day time period, this letter will be considered final and can be made available to the public.

If there are any questions or there is a request for technical assistance, please do not hesitate to contact Elizabeth Clark, Senior CPD Representative, at [elizabeth.clark@hud.gov](mailto:elizabeth.clark@hud.gov).

Sincerely,



Katy Burke  
Regional Director

ecc: Bruce Grubb, City Administrator  
Tia Braseth, Planning Coordinator

January 8, 2021

Katy Burke, Regional Director  
Community Planning and Development  
U.S. Department of Housing and Urban Development  
Region VIII, Denver  
1670 Broadway Street  
Denver, CO 80202

SUBJECT: 2019 Annual Community Assessment

Dear Ms. Burke:

This letter is in response to the December 10, 2020 letter from your office regarding the City of Fargo's Annual Community Assessment, which noted that there were several discrepancies between the IDIS CR-05 Table 2 "Accomplishments – Strategic Plan to Date" and the City's table, "Assessment of Objectives and Accomplishments". Corrections have been made in IDIS and the City's table. However, there were a number of discrepancies triggered by CDBG-CV activities, information output between tables, and the overall 5-Year Plan goals. These issues were explained and discussed on a January 4, 2021 phone call with HUD's Senior CPD Representative Elizabeth Clark. The issues are described below:

**Discrepancies related to:**

- **CDBG-CV:** CDBG-CV projects and their associated goals were amended into the 2019 plan as recommended by HUD. The goal outcome indicator numbers for these projects were initially included in the IDIS table, which generated a "0" for the percentage completed because the activities just started. They have since been removed from the IDIS table because CV activities will be reported in a separate CAPER.
- **Table Comparison/Information Output:** Comparing both tables may cause some confusion because each table shows somewhat different information (i.e., City's table only reports 2019 data and activities, while the IDIS table shows all 5-year activities). In future years, the City will include all of the same information in the CR-05 Table 2, but will continue to show more detailed data on the year being reported in the CAPER.
- **Overall 5-Year Plan Goals:** It was noted that Fargo will not meet all of its housing and community development goals in the consolidated plan. This can be attributed to the fact that the 2015-2019 plan was the first to be done in the IDIS e-Con Planning Suite for all Grantees, so there was a considerable learning curve. Additionally, the City of Fargo had a change in most of the staff responsible for the HUD programs during the last two years of the plan. Ideally, the consolidated plan should have been amended to update some of the goals. For example, some goal outcome indicators related to the affordable housing goal were unrealistic or there was an error in terms of the number of units to be built versus funded. Had the plan been amended, over 60 -70% of the affordable housing goal would have been met instead of 4%. In the future,

these issues should not happen because the Division responsible for the HUD programs is now fully staffed and has started integrating succession planning into its policies and procedures. Additionally, staff has gained considerable experience with the IDIS eCon Planning Suite and the overall connections between goals, goal outcome indicators, activity planning, timely expenditure, tracking, and budgeting. Certainly, it is an advantage for all of this staff to be here at the beginning of the 2020-2024 plan after gaining this experience.

Thank you for the opportunity to respond. Please let us know if you have any questions or comments. My phone number is 701-476-4144 and my email is [tbraseth@fargond.gov](mailto:tbraseth@fargond.gov).

Sincerely,



Tia Braseth  
Planning Coordinator

cc: Elizabeth Clark, Senior CPD Representative