



U.S. Department of Housing and Urban Development

**Philadelphia Office
The Wanamaker Building
100 Penn Square East
Philadelphia, Pennsylvania 19107-3380**

November 16, 2021

Mr. Robert L. Weir
Director
Department of Real Estate and Housing
Louis L. Redding City/County Bldg.
800 French Street, 7th Floor
Wilmington, DE 19801-3537

Dear Mr. Weir:

RE: Monitoring Review Response
HOME Investment Partnership Program

We have completed our review of the City of Wilmington's July 28, 2021 letter, which was submitted in response to our June 28, 2021 monitoring letter. Detailed below is our determination regarding the City's open monitoring findings.

Finding #1

Condition: The City did not conduct subsidy layering or underwriting review to ensure that it did not invest any more HOME funds than necessary to ensure long term viability for the HOME funds invested for 608 E. 11th Street = \$16,418.45; 525 Vandever Avenue = \$195,000; and 505 Lafayette Blvd.= \$186,018.

Cause: The City did not implement its own procedures or the HOME requirements.

Criteria: The City is in violation of 24 CFR 92.250 (a) and (b).

Effect: A determination that a reasonable level of profit or return on the owners or developer's investment may not have been determined.

Required Corrective Action: The City will need to inform the Department that going forward how this requirement will be implemented and how it will ensure that for all projects utilizing HOME funds will comply with the underwriting and subsidy layering requirements. We request that the City submit the underwriting and subsidy layering for the three projects to this Office within 30 days of the date of this letter.

Grantee's 7/28/21 Response:

City staff will be trained on HOME requirements and City policies and procedures for subsidy layering and underwriting review to ensure that future HOME projects comply with applicable underwriting and subsidy layering requirements. In addition, future projects shall be subjected to internal layers of review to ensure compliance with such requirements.

HUD's Response:

We have reviewed the documentation submitted by the City. It has been concluded that the applicable underwriting and subsidy layering was completed for the three projects. Our Office accepts the City's response and now closes Finding #1.

Finding #2

Condition: The contract/agreement for HOME funds totaled \$16,418.45 for 608 E. 11th Street architect/professional services. The City provided documentation for \$10,950.00 for eligible soft cost. However, there was no back-up documentation for either \$200.00 or \$5,268.45 that make up the total cost of the project.

Cause: Lack of staff coordination within the City.

Criteria: The City is in violation of 24 CFR 92.206(d).

Effect: Costs may not have been eligible.

Required Corrective Action: We request that the City submit proof of all costs (\$5,468.45) for the professional services contract to this Office within 30 days of the date of this letter.

Grantee's 7/28/21 Response:

The City provided the back-up documentation for the \$5,468.45 in project costs for the above-referenced project - 608 E. 11th Street.

HUD's Response:

We have reviewed the documentation submitted by the City. It appears to be applicable back-up documentation submitted to verify \$16,418.45 in eligible project costs. Our Office accepts the City's response and now closes Finding #2.

Finding #3

Condition: The City did not provide documentation that property was sold to an eligible homebuyer. (Oliver's Way- 505 Lafayette)

Cause: The City did not follow its policies and procedures

Criteria: The City is in violation of 24 CFR 92.254(a)(3)

Effect: Property may not have been sold to an eligible homebuyer.

Required Corrective Action: The City does have policies and procedures that include a provision for the selection of qualified homebuyers. The City did not follow their own procedures. We request that the City provide documentation that the property was sold to an eligible homebuyer to this Office within 30 days of the date of this letter.

Grantee's 7/28/21 Response:

City staff will be trained on the required documentation to verify that a property has been sold to an eligible homebuyer. In addition, future projects shall be subjected to internal layers of review to ensure that such documentation is obtained. The City will be utilizing a third party to verify applicant's financial information.

HUD's Response:

The City did not provide documentation that the property was sold to an eligible homebuyer. This finding will remain open until the funds allocated to this project are returned from non-Federal funds or the City provides documentation that the property was sold to an eligible homebuyer. This property is the subject of the City's Voluntary Grant Reduction request. This finding cannot be closed until the decision is made on the City's Voluntary Grant Reduction request.

Finding #4

Condition: The City did not provide documentation that a determination was made that the household qualified as low income, nor was there at least 2 months of source documentation to determine household annual income. (Oliver's Way - 505 Lafayette)

Cause: The City did not follow its policies and procedures.

Criteria: The City is in violation of 24 CFR 92.203(a)(2) and 24 CFR 254(a)(3)

Effect: Household may not have been income eligible.

Required Corrective Action: The City does have policies and procedures that include a provision for the selection of qualified homebuyers. The City did not follow their own procedures. We request that the City provide documentation that property was sold to a low-income household to this Office within 30 days of the date of this letter.

Grantee's 7/28/21 Response:

City staff will be trained on the required documentation to verify that a household qualifies as low income and the requirement that staff obtain at least 2 months of source documentation for a household's annual income. In addition, future projects shall be subjected to internal layers of review to ensure that such documentation is obtained. The City provided the documentation evidencing that the household for the above-referenced property qualifies as low income and 2 months of source documentation of such household's annual income. Financial documents were collected from the buyer and upon closer examination, the buyer furnished triplicates of the same information. Moving forward, the Department has submitted an application with work numbers to have them provide all necessary financial information on buyers.

HUD's Response:

The City did not provide proper documentation that the household qualified as low income nor was adequate source documentation of household's annual income collected. This finding will remain open until the funds allocated to this project are returned from non-Federal funds or the City provides documentation that the property was sold to a low-income household. This property is also the subject of the City's Voluntary Grant Reduction request. This finding cannot be closed until the decision is made on the City's Voluntary Grant Reduction request.

Finding #5

Condition: There was no documentation that the homebuyer received housing counseling from a HUD-certified housing counselor. (505 Lafayette Blvd-Oliver's Way)

Cause: The City did not follow its policies and procedures

Criteria: The City is in violation of 24 CFR 92.254(a)(3).

Effect: Household did not meet requirement of completing housing counseling.

Required Corrective Action: The City does have policies and procedures that include a provision for the selection of qualified homebuyers. We request that the City provide documentation that the homebuyer completed housing counseling to this Office within 30 days of the date of this letter.

Grantee's 7/28/21 Response:

City staff will be trained on the required documentation to confirm that a homebuyer received housing counseling from a HUD-certified housing counselor. In addition, future projects shall be subjected to internal layers of review to ensure that such documentation is obtained.

HUD's Response:

The City did not provide documentation to confirm that a homebuyer received housing counseling from a HUD-certified housing counselor. This finding will remain open until the funds allocated to this project are returned from non-Federal funds or the City provides documentation that the homebuyer received housing counseling from a HUD-certified housing counselor. This property is also the subject of the City's Voluntary Grant Reduction request. This finding cannot be closed until the decision is made on the City's Voluntary Grant Reduction request.

Finding #6

Condition: The project file did not include records that demonstrated that the City reviewed homebuyer's loan to ensure it did not contain risky lending features. (Oliver's Way 505 - Lafayette)

Cause: The City did not include this requirement in its' policies and procedures

Criteria: The City is in violation of 24 CFR 92.254(f)(2).

Effect: Mortgage financing may not have been reasonable.

Required Corrective Action: The City is requested to update its policies and procedures to include a provision to review loans to ensure it does not contain risky lending features. Please submit this documentation to this Office within 30 days of the date of this letter.

Grantee's 7/28/21 Response:

The City has updated its policies and procedures to require any City staff overseeing future HOME projects to evaluate the homebuyer's loan for such project to confirm that the terms of such loan are reasonable and do not contain any predatory or risky lending features in violation of 24 CFR 92.254(f)(2). The City provided revised Subsidy Layering policies and procedures and incorporated by reference in the P&P main document and at Appendix G.

HUD's Response:

The City provided documentation to confirm updated policies and procedures to include loans do not contain predatory or risky lending features. Our Office accepts the City's response and will now close Finding #6.

Finding #7

Condition: The written agreements included affordability requirements but the retention agreements with the homeowners did not meet the period of affordability requirement.

Cause: The City did not follow its policies and procedures or the regulations.

Criteria: The City is in violation of 24 CFR 92.254(a)(4) and 24 CFR 92.504(c)(3)(ii).

Effect: The written agreements include requirement remedies set forth for period of affordability. However, the retention agreement requires the purchaser to maintain the unit as their primary residence for only 15 years not the required 20 years. (525 Vandever Avenue). The agreement for property at 505 Lafayette Blvd included an affordability requirement of 20 years but the retention agreement with the homeowner was for a period of 15 years. For 608 E. 11th street, the period of affordability was set at 5 years in the retention agreement with homeowner but should have been 15 years based upon the amount of HOME assistance.

Required Corrective Action: The City does have policies and procedures that include a provision for period of affordability. The City did not follow their own procedures or the regulations. The City is requested to submit documentation of the corrections to this Office within 30 days of the date of this letter.

Grantee's 7/28/21 Response:

City staff will be trained on the applicable affordability requirements for HOME projects. In addition, future projects shall be subjected to internal layers of review to ensure that appropriate affordability requirements are included within the documentation for such projects. For 505 Lafayette the City has opted not to impose the stricter 20-year affordability period but rather modify the development agreement to reflect 15-year affordability period. The City provided copies of the corrected retention agreement for 608 E. 11th Street and 525 Vandever Avenue in the attachment titled "Finding 7".

HUD's Response:

We have reviewed the corrected retention agreements for 608 E. 11th street and 525 Vandever Avenue and find them to be acceptable agreements that reflect the correct affordability periods. However, the modified development agreement to reflect the 15-year affordability for the property at 505 Lafayette was not included in attachment from the City. This property is the subject of the City's Voluntary Grant Reduction request. This finding cannot be closed until the decision is made on the City's Voluntary Grant Reduction request.

Finding #8

Condition: The City did not utilize the correct maximum per-unit subsidy amount. (All 3 projects)

Cause: The City did not implement its own procedures.

Criteria: The City is in violation of 24 CFR 92.250 (a).

Effect: The housing may have exceeded the per unit dollar limitation established by HUD.

Required Corrective Action: The City will need to provide documentation that the housing met the correct maximum per-unit subsidy amount. The City is requested to submit this documentation to this Office within 30 days of the date of this letter.

Grantee's 7/28/21 Response:

The City provided the documentation that the housing for each project met the correct maximum per unit subsidy amount in the attachment titled "Finding 8"

HUD's Response:

The City provided documentation to confirm the three properties met the correct maximum per unit subsidy amount. Our Office accepts the City's response and now closes Finding #8.

Finding #9

Condition: We could not establish if all costs associated with the project were eligible. (Oliver's Way 505 Lafayette)

Cause: The City did not follow its policies and procedures or the regulations.

Criteria: The City is in violation of 2 CFR 200.53(b) and 24 CFR 92.206.

Effect: Costs associated with the project may not have been eligible

Required Corrective Action: The City does have policies and procedures that include a provision for eligible costs for which HOME funds may be used. The City did not follow their own procedures. We request that the City submit the documentation of all eligible costs associated with Oliver's Way to this Office within 30 days of the date of this letter.

Grantee's 7/28/21 Response:

The City provided the documentation that all costs for such project were eligible in the attachment titled "Finding 9".

HUD's Response:

The City provided documentation to confirm the costs and draws associated with 505 Lafayette do appear as eligible costs in accordance with 24 CFR 92.206. This project was deemed ineligible and is the subject of the City's Voluntary Grant Reduction request. This finding cannot be closed until the decision is made on the City's Voluntary Grant Reduction request.

Finding #10

Condition: There was no documentation that the value of each matching contribution was calculated properly.

Cause: The City did not implement its own procedures or the match requirements.

Criteria: The City is in violation of 24 CFR 92.220(a)(1).

Effect: A determination could not be made if match contribution was correct for the HOME projects.

Required Corrective Action: The City will need to provide documentation of how the match for the three projects were actually calculated. We request that the City submit the match calculations of all three projects (#1680, #1682 and #1747) to this Office within 30 days of the date of this letter.

Grantee's 7/28/21 Response:

The City provided the documentation for the match calculation for each of the three, above-referenced projects in the attachment titled "Finding 10".

HUD's Response:

We have reviewed your response to finding #10 and find the documentation the City provided does not suffice to close the finding. In reference to the "match logs" sent in by the City, we find the following:

- #8 – There is no amount listed for "Value of Match Contribution."
 - The City needs to enter the amount of the match contribution being logged.
- #9 – There is no "Type of Match" listed."
 - The City needs to indicate the category of eligible match into which the contribution listed in Column 8 falls. (see 24 CFR 92.220 for eligible match types)
- # 10 – There is no date listed for "Date Match Recognized."
 - The City needs to enter the date that the match contribution was recognized under the HOME rule.
 - The City needs to understand the timing of recognizing match. Listed is the required timing recognition.
 - Cash credited when it is expended
 - Loans credited at loan closing
 - Waived fees/charges credited when waived
 - Donated real property credited when transferred
 - Infrastructure credited when funds expended
 - Donated material credited when materials used
 - Donated labor credited when performed
 - Social services/homebuyer counseling credited when performed

There is no amount listed for “Balance Forward.”

- The City needs to enter the total of all entries made on prior log sheet. The “Balance Forward” should be a cumulative total of match.

There is no supporting documentation to support the match.

- The City needs to document the source of match (contracts, grant agreements, waiver documentation, etc.), the project(s) to which it is being credited and proof when the match occurred (example listed above).

The City should use oldest carry over match before using current match contributions as this shortens and simplifies recordkeeping. The records must be maintained for 5 years after match is counted as expended. (Example: if match is listed as expended in PY2021 then the documentation must be retained until PY2026). As mentioned, this finding cannot be closed until the City correctly captures its match contribution.

Finding #11

Condition: The City does not have a running match log indicating type and amount of match contributions or if match contributions were credited at the correct time.

Cause: The City did not implement its own procedures or the match requirement.

Criteria: The City is in violation of 24 CFR 92.508 (a)(2)(ix) and 24 CFR 92.221(a).

Effect: The City may not have applied the correct amount of match for projects at the correct time.

Required Corrective Action: The City will need to provide a running match log that shows the contributions that qualified as match for at least beginning of fiscal year 2018 and to ensure that the match was credited correctly. We request that the City submit this documentation to our Office within 30 days of the date of this letter.

Grantee’s 7/28/21 Response:

The City provided the requested match log in the attachment titled "Finding 11".

HUD’s Response:

As stated in response to finding # 10. The City needs to maintain a running log of match obligations/contributions. At minimum the logs must show:

- Documentation of the source of match (contracts, grant agreements, waiver documentation, etc.);
- The project(s) to which it is being credited and;
- Proof when the match occurred.

The City needs to provide all the documentation for the cumulative total of HOME Match it is claiming. The City should use oldest carry over match before using current match contributions as this shortens and simplifies recordkeeping. The records must be maintained for 5 years after match is counted as expended. (Example: if match is listed as expended in PY2021 then the documentation must be retained until PY2026). This finding also cannot be closed until the City correctly captures its match contribution.

Finding #12

Condition: The City did not document the eligibility and value of match contributions, nor did the City show how it met its annual match requirement for the program year.

Cause: The City did not implement its own procedures or the match requirement.

Criteria: The City is in violation of 24 CFR 92.218 and 24 CFR 92.219 (a).

Effect: The City may not have applied an eligible value of match contributions.

Required Corrective Action: The City will need to provide documentation as to the eligibility and value of all match contributions for the three projects. We request that the City submit this documentation to this Office within 30 days of the date of this letter.

Grantee's 7/28/21 Response:

The City provided the documentation for the eligibility and value of match contributions for each of the three, above-referenced projects in the attachment titled "Finding 12".

HUD's Response:

We have reviewed the information submitted for finding #12 and find the City still needs to provide the following for the annual match amount identified for each year:

- Documentation of the source of match (contracts, grant agreements, waiver documentation, etc.);
- The project(s) to which it is being credited and;
- Proof when the match occurred

This finding cannot be closed until the City correctly captures the annual match amount identified for each year.

Finding #13

Condition: The City paid for service costs of project more than once for Oliver's Way (505 Lafayette Blvd).

Cause: The City paid for duplicate services without a review of costs.

Criteria: The City is in violation of 2 CFR 200.53(b) and 24 CFR 92.206.

Effect: The City may not have paid for eligible costs.

Required Corrective Action: Although the City will need to re-imburse its line of credit for all the funding associated with Oliver's Way, it will still need to provide documentation for the eligible costs that was funded for this project. We request that the City submit this documentation to this Office within 30 days of the date of this letter.

Grantee's 7/28/21 Response:

To date, the City has been unable to locate any documentation to confirm that the City did not pay for duplicate services. As a result, the Policy and Procedures manual has been updated to address the duplication of payments (pgs,19,29).

HUD's Response:

This project for Oliver's Way (505 Lafayette Blvd) was deemed ineligible and is the subject of the City's Voluntary Grant Reduction request. This finding cannot be closed until the decision is made on the City's Voluntary Grant Reduction request.

Finding #14

Condition: The project (Oliver's Way - 505 Lafayette Blvd) was not closed out within 120 days of the final project draw in IDIS – the project was not completed in IDIS until a year later.

Cause: The City did not follow the requirements of the HOME program regarding IDIS closeout.

Criteria: The City is in violation of 24 CFR 92.502(d)(1).

Effect: If satisfactory project completion information is not provided, HUD may suspend further project set-ups or take other corrective actions.

Required Corrective Action: The City will need to update its policies and procedures to include a requirement that activities be closed out in IDIS 120 days of final project draw. We request that the City submit this documentation to this Office within 30 days of the date of this letter.

Grantee's 7/28/21 Response:

The City has updated its policies and procedures to require that activities be closed out in IDIS within 120 days of a final project draw. Staff will receive training and oversight to ensure that this practice is followed in the future. This is included on pp 24 and 34 for rental and homebuyer, respectively, in the attachment titled "Policy and Procedures".

HUD's Response:

The City provided documentation to confirm their policy and procedures have been updated to include activities be closed out in IDIS within 120 days of a final project draw. Our Office accepts the City's response and now closes Finding #14.

Finding #15

Condition: The CHDO, "Our Youth Inc", does not provide a formal process for low-income program beneficiaries to advise the organization in its decisions regarding the design, siting, development and management of affordable housing projects - Oliver's Way (505 Lafayette Blvd).

Cause: The City did not follow all the requirements for CHDO certification.

Criteria: The City is in violation of 24 CFR 92.8(ii).

Effect: CHDO may not have been an eligible organization to do HOME projects.

Required Corrective Action: The City will need to update its policies and procedures to include this requirement in their CHDO procedures. We request that the city submit this documentation to this Office within 30 days of the date of this letter.

Grantee's 7/28/21 Response:

The City has updated its policies and procedures to require that all organizations seeking to be classified as a CHDO shall adopt and implement a formal process for low-income program beneficiaries to advise such organization in its decisions regarding the design, siting, development, and management of affordable housing projects as required by 24 CFR 92.8(ii). The low-income requirement is included in the CHDO P&P on pgs. 2, 3 in the attachment titled "Policy and Procedures". The City will monitor this process in the future to ensure compliance.

HUD's Response:

The City provided documentation to confirm their policy and procedures have been updated to include a formal process for low-income beneficiaries to advise such organizations in its decisions regarding the design, siting, development and management of affordable housing projects. Our Office accepts the City's response and now closes Finding #15.

Finding #16

Condition: There was no documentation that the CHDO, "Our Youth Inc", had standards of financial accountability - Oliver's Way (505 Lafayette Blvd).

Cause: The City did not follow all the requirements for CHDO certification

Criteria: The City is in violation of 24 CFR 92.2(B)(6).

Effect: CHDO may not have been an eligible organization to do HOME projects.

Required Corrective Action: The City will need to update its policies and procedures to include this requirement in their CHDO procedures. We request that the City submit this documentation to this Office within 30 days of the date of this letter.

Grantee's 7/28/21 Response:

The City has updated its policies and procedures to require that all organizations seeking to be classified as a CHDO shall adopt and implement standards of financial accountability as required by 24 CFR 92.2(B)(6). The Financial Accountability is included on p. 6 of the CHDO P&P in the attachment titled "Policy and Procedures".

HUD's Response:

The City provided documentation to confirm their policy and procedures have been updated to require organizations shall adopt and implement standards of financial accountability. Our Office accepts the City's response and now closes Finding #16.

Finding #17

Condition: The City did not certify the CHDO ("Our Youth Inc") prior to the commitment of funds. The same standard was not met for activity #1684.

Cause: The City did not follow the CHDO program requirements or its policy and procedures.

Criteria: The City is in violation of 24 CFR 92.300(a).

Effect: The CHDO project carried out by "Our Youth Inc" was ineligible.

Required Corrective Action: The City will need to pay back to its line of credit all HOME funding associated with the CHDO "Our Youth Inc" from non-Federal funds (\$358,849.00 plus the operating funds of \$21,809, Activity #1747). The City will in addition need to pay to the line of credit from non-Federal funds the amount of \$65,462 (Activity #1684). We request that the City submit this proof of the repayments to this Office within 30 days of the date of this letter.

Grantee's 7/28/21 Response:

The City has requested a repayment plan which was sent to Nadab Bynum under separate cover on 7/28/2021 in reference to Finding# 17 and #18.

HUD's Response:

This finding will remain open until the funds allocated to this project are returned from non-Federal funds. This activity is the subject of the City's Voluntary Grant Reduction request. This finding cannot be closed until the decision is made on the City's Voluntary Grant Reduction request.

Finding #18

Condition: The CHDO, "Our Youth, Inc" did not have paid employees with housing development experience who work on projects assisted with HOME funds.

Cause: The City did not follow the CHDO program requirements.

Criteria: The City is in violation of 24 CFR 92.9.

Effect: The CHDO project carried out by "Our Youth Inc" was ineligible.

Required Corrective Action: Please see above the corrective action for finding #17. We request that the City submit this this proof of the repayment documentation to this Office within 30 days of the date of this letter.

Grantee's 7/28/21 Response:

The City has requested a repayment plan which was sent to Nadab Bynum under separate cover on 7/28/2021 in reference to Finding# 17 and #18.

HUD's Response:

This finding will remain open until the funds allocated to this project are returned from non-Federal funds. This activity is the subject of the City's Voluntary Grant Reduction request. This finding cannot be closed until the decision is made on the City's Voluntary Grant Reduction request.

Finding #19

Condition: There was no documentation that sales proceeds from the properties were reverted back to the City or if funds were placed in the City's program income account. (525 Vandever Avenue and 608 E. 11th Street)

Cause: The City did not follow the requirements in their RFP or the regulations for Part 92

Criteria: The City is in violation of 24 CFR 92.504(c)(3)(ii)(B).

Effect: Proceeds may not have been allocated to a HOME eligible project.

Required Corrective Action: The City will need to update its policies and procedures to include requirement of proceeds from projects as stated in their RFP. If these funds cannot be accounted for, then they will have to be paid back to the line of credit from non-Federal funds. We request that the City submit this documentation to this Office within 30 days of the date of this letter.

Grantee's 7/28/21 Response:

The City has updated its policies and procedures to include in the loan agreement whether the City will require that sales proceeds from future HOME projects revert back to the City or maybe retained by the Developer against eligible costs. This language can be found in P&P on p 36 in the section on Written Agreements in the attachment titled "Policy and Procedures".

The proceeds from 608 E 11th Street were reallocated in IDIS accurately reflecting CDBG and HOME percentages. HOME funds receipted were \$7,362.29.

The Wilmington Housing Partnership Corporation (WHP) began the Walt's Way project in 2013. During that time, there were pledges of financial support that eventually were withdrawn. Because of that, the WHP took out loans to complete the project. During construction, the original contractor had financial difficulties and in addition, passed away, which increased the per unit costs. To offset these costs, the City allowed the proceeds from the sale of 525 Vandever Avenue to help satisfy the Barclay's line of credit.

HUD's Response:

The City needs to provide the documentation of the \$7,362.29 being adjusted in IDIS. As it relates to WHP, the City will need to provide the following documentation when they re-evaluated the project at the point it was determined troubled and had financial difficulties. Please provide:

1. subsidy layering
2. underwriting
3. revised budget
4. revised source and usage
5. revised maximum subsidy limit for the unit

The City has not provided documentation of the calculation and utilization of the proceeds from the sale of 525 Vandever Avenue. Please provide documentation that includes the calculation of the sale amount and utilization of the proceeds. The City stated the funds were offset against development costs, if so, documentation of funds going to Barclay's line of credit and proof of how it was utilized at 525 Vandever Avenue must be provided. If these funds cannot be accounted for, then they will have to be paid back to the line of credit from non-Federal funds. This finding will remain open until the proceeds from this project are properly documented or returned.

We appreciate your efforts in resolving findings #1 #2, #6, #8, #14, #15 and #16. Please note that findings #3, #4, #5, #7, #9, #10, #11, #12, #13, #17, #18 and #19 still remain open. If you have any further questions regarding this matter, please do not hesitate to contact Ms. Michelle Patterson, Senior Community Planning and Development Representative, via email at michelle.patterson@hud.gov. This Office may also be reached via text telephone (TTY), by dialing (877) 833-7729.

Sincerely,

NADAB BYNUM

Digitally signed by: NADAB BYNUM
DN: cn = NADAB BYNUM c = US o = U.S.
Government OU = Department of Housing and
Urban Development, Office of Administration
Date: 2021.11.17 08:22:06 -05'00'

Nadab O. Bynum
Director
Office of Community Planning
and Development