

Second Program Year Action Plan

Narrative Responses

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Executive Summary

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

Executive Summary Response - Introduction

The HOME program was created as part of the 1990 National Affordable Housing Act. The HOME program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for low income households (defined as below 80 percent of area median income). The program gives local governments the flexibility to fund a wide range of affordable housing activities through housing partnerships with private industry and non-profit organizations.

HOME funds can be used for activities that promote affordable rental housing and homeownership by low income households, including:

- Acquisition
- New construction and reconstruction
- Moderate or substantial rehabilitation
- Homebuyer assistance
- Tenant-based rental assistance

The **North Shore HOME Consortium [NSHC]** is comprised of 30 communities, and is located north of Boston, Massachusetts. The City of Peabody is the Lead Community and the following cities and towns are member communities of the North Shore HOME Consortium:

Amesbury	Andover	Beverly	Boxford	Danvers
Essex	Georgetown	Gloucester	Hamilton	Haverhill
Ipswich	Lynnfield	Manchester	Marblehead	Merrimac
Methuen	Middleton	Newburyport	North Andover	North Reading
Peabody	Rockport	Rowley	Salem	Salisbury
Swampscott	Topsfield	Wenham	West Newbury	Wilmington

Additional data about the Consortium and its communities can be found in the Housing Market Analysis section of the 5 Year Strategic Plan.

The NSHC was formed in order to allow HOME funds from the Department of Housing and Urban Development [HUD] to be directed to the communities within its' region.

Executive Summary Response: Include the objectives and outcomes identified in the plan.

The North Shore HOME Consortium, in accord with its five year objectives, has developed this one year plan to address the housing needs of the area. The strategy is targeted to both the rental and homeownership market for low-income households, along with rehabilitation programs and resources for special needs populations. These are shown below, along with a proposed one-year allocation of HOME funds.

OBJECTIVE #1 Develop an adequate supply of safe, decent rental housing that is affordable and accessible to residents with a range of incomes including those with special needs.

- Goal 1 Assist in creating or preserving 55 affordable rental units;
- Goal 2 Ensure that deep enough subsidies are in place to make a percentage of units truly affordable to very low and extremely low income households and the homeless
- Goal 3 Ensure that a percentage of the units created are accessible to persons with disabilities.
- Goal 4 Provide tenant-based rental assistance to 75 low-income households, including those with special needs.
- Goal 5 Develop partnerships with housing providers who create housing for special needs populations.

OBJECTIVE #2 Reduce individual and family homelessness

- Goal 1 Coordinate with the continuum of care system for the region with a focus on ending homelessness;

- Goal 2 Channel HOME funds to activities that create permanent and transitional affordable housing units for homeless persons.
- Goal 3 Provide tenant based rental assistance to homeless and at risk households (see rental objective #1, goal 4, above)

OBJECTIVE #3 Preserve, maintain and improve the existing stock of affordable housing, particularly units occupied by extremely low and very low-income households.

- Goal 1 Rehabilitate and/or remove barriers to accessibility for 18 housing units, including units owned by elderly persons, disabled persons, and other special needs groups.

OBJECTIVE #4 Expand homeownership opportunities for low-income households.

- Goal 1 Provide down payment assistance to 27 low to moderate income households to allow them to become homeowners;
- Goal 2 Create 2 new affordable homeownership units for very low income households.

TABLE 1: Estimated HOME Allocations FY 2011

Program	HOME Budget
HOME Housing Rehabilitation	\$313,561
HOME Rental Housing Production	\$836,164
Homeownership Production Programs	\$63,875
TBRA	\$463,745
Homeownership Downpayment Programs	\$204,889
HOME Administration	\$209,137
TOTAL ALL REQUESTS	\$2,091,371.00

Executive Summary Response: Evaluation of Past Performance

The North Shore HOME Consortium has completed 221 units of affordable housing for low and moderate income households through the use of HOME funds so far during FY2010. This assistance was utilized for the creation of affordable rental and homeownership units, for down payment and rehabilitation assistance to homeowners, and for tenant based rental assistance programs.

During this period, a total of 63 units of affordable rental housing was developed. 3 new affordable homeownership units were also created and made available for sale to low income First time homebuyers.

Also during this time frame, First Time Homebuyer Down Payment Assistance programs in the Consortium assisted 45 low to moderate income households to enter into the home ownership market.

Housing Rehabilitation programs in the region made renovations and improvements to the homes of 12 low and moderate income homeowners to bring units up to meet state and local building and health codes and to allow homeowners to remain in their homes.

The Consortium also funded two types of Tenant Based Rental Assistance programs during this time frame: A program to provide security deposit assistance to help households to afford the initial expense of renting an apartment, and a short term rental subsidy program which assisted households with paying a portion of their rent for one year. Assistance was provided to a total of 101 households.

Executive Summary Response: Summary of Citizen Participation and Consultation Process (including efforts to broaden public participation (24 CFR 91.200 (b)))

The Consortium's approach to citizen participation this year has been to continue and where necessary, improve upon the process used in prior years. Groups active in areas which use or could use resources were made aware of the process, by advertisements and public notices. Over 150 different organizations and agencies were sent a survey seeking input on their perception and knowledge of needs and their priority ranking of those needs, for the purposes of planning. In addition, this same group was invited to attend meetings and send in comments through direct mail and/or email.

The planning and citizen participation activities for these plans generally begin in November of the preceding fiscal year, utilizing

community outreach meetings. These meetings are conducted for the purpose of soliciting public comment and include information for project proposals relative to community needs and program priorities for the first annual plan.

If, at any time, it is anticipated that a significant number of non-English speaking residents can be reasonably expected to participate in public meetings or participate in the planning and evaluation process of the Annual Plan and with adequate prior notice an interpreter will be secured. Also, the hearings will be held at times and locations convenient to potential and actual beneficiaries with accommodations available for persons with disabilities.

In addition to these broader public forums, additional technical assistance is provided to assist people with the preparation of proposals for funding and if requested, the formation of a CHDO.

General Questions

Action Plan General Questions response:

1. *Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.*

The NSHC, while not required to do so, distributes most of its HOME funds to its' member communities based upon the number of low-mod households identified in each community. The communities with the largest percentage of low-mod households therefore have access to the largest share of funds.

The following map illustrates the geographic area of the 30 communities which make up the NSHC.

Map 1: NSHC Area

North Shore Home Consortium



Table 2: Low-Mod and Racial/Minority Concentrations¹ (2000 Census)

Community	Total Population	Low-Mod Population	% Low-Mod 2000
Amesbury	16,450	2,821	17.15%
Andover	31,247	2,934	9.39%
Beverly	39,862	6,324	15.86%
Boxford	7,921	338	4.27%
Danvers	25,212	3,713	14.73%
Essex	3,267	499	15.27%
Georgetown	7,377	736	9.98%
Gloucester	30,273	5,873	19.40%
Hamilton	8,315	743	8.94%
Haverhill	58,969	10,859	18.41%
Ipswich	12,987	2,123	16.35%
Lynnfield	11,542	1,005	8.71%
Manchester	5,228	679	12.99%
Marblehead	20,377	2,412	11.84%
Merrimac	6,138	921	15.00%
Methuen	43,789	7,766	17.74%
Middleton	7,744	678	8.76%
Newburyport	17,189	2,706	15.74%
North Andover	27,202	3,050	11.21%
North Reading	13,837	1,298	9.38%
Peabody	48,129	7,718	16.04%
Rockport	7,767	1,543	19.87%
Rowley	5,500	643	11.69%
Salem	40,407	8,873	21.96%
Salisbury	7,827	1,503	19.20%
Swampscott	6,141	489	7.96%
Topsfield	14,412	1,765	12.25%
Wenham	4,440	354	7.97%
West Newbury	4,149	282	6.80%
Wilmington	21,363	1,934	9.05%
NSHC Total	555,061	82,582	14.88%

It should be noted that the Consortium includes an exceptionally diverse set of communities. Some are very small towns and some are large cities. Some communities are very rural while others are suburban and some are primarily urban. They each have different needs and different concerns.

¹ US Census 2000 SF3. The ACS data for 2008 is only available for 11 of the 30 communities, but they represent 67% of the households in the NSHC.

Even with this diversity, the Consortium believes that significant concentrations of low and moderate income persons and/or racial/ethnic concentrations provide pertinent information when local decisions are made regarding where HOME resources might be focused. De-concentration of poverty and race is a Congressional objective and under HUD regulations it affects the site selection of new housing.

A new factor affecting our communities over the last 3 years, which is also projected to continue for the next two to three years, is the foreclosure crisis. The rates of foreclosure of homes has greatly increased nationwide during this time period due to multiple factors ranging from sub-prime lending practices to the high unemployment rate. The Neighborhood Stabilization Program [NSP] required HUD and the State to identify communities with significant foreclosure problems and within those communities, the neighborhoods hardest hit. Within the Consortium, the communities of Haverhill, Methuen, Peabody and Salem were identified as having the highest numbers of foreclosures. This foreclosure crisis in general, and the needs of those communities most impacted by it, will be considered in the allocation of HOME resources.

While the Consortium does not allocate resources based on minority/ethnic concentration it has compiled information for each community as required by HUD.

Table 3: Minority Percentages²

Community	% Minority 2009 Estimate
Amesbury	4.19%
Andover	14.85%
Beverly	6.36%
Boxford	4.23%
Danvers	3.67%
Essex	2.21%
Georgetown	2.26%
Gloucester	4.75%
Hamilton	10.06%
Haverhill	17.46%

² ESRI 2009

North Shore Home Consortium

Community	% Minority 2009 Estimate
Ipswich	3.80%
Lynnfield	5.33%
Manchester	1.65%
Marblehead	3.82%
Merrimac	2.67%
Methuen	18.04%
Middleton	6.64%
Newburyport	3.00%
North Andover	11.00%
North Reading	3.72%
Peabody	9.77%
Rockport	3.52%
Rowley	2.51%
Salem	25.11%
Salisbury	3.78%
Swampscott	3.93%
Topsfield	3.50%
Wenham	3.52%
West Newbury	2.36%
Wilmington	5.75%
NSHC Total	8.55%

2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.

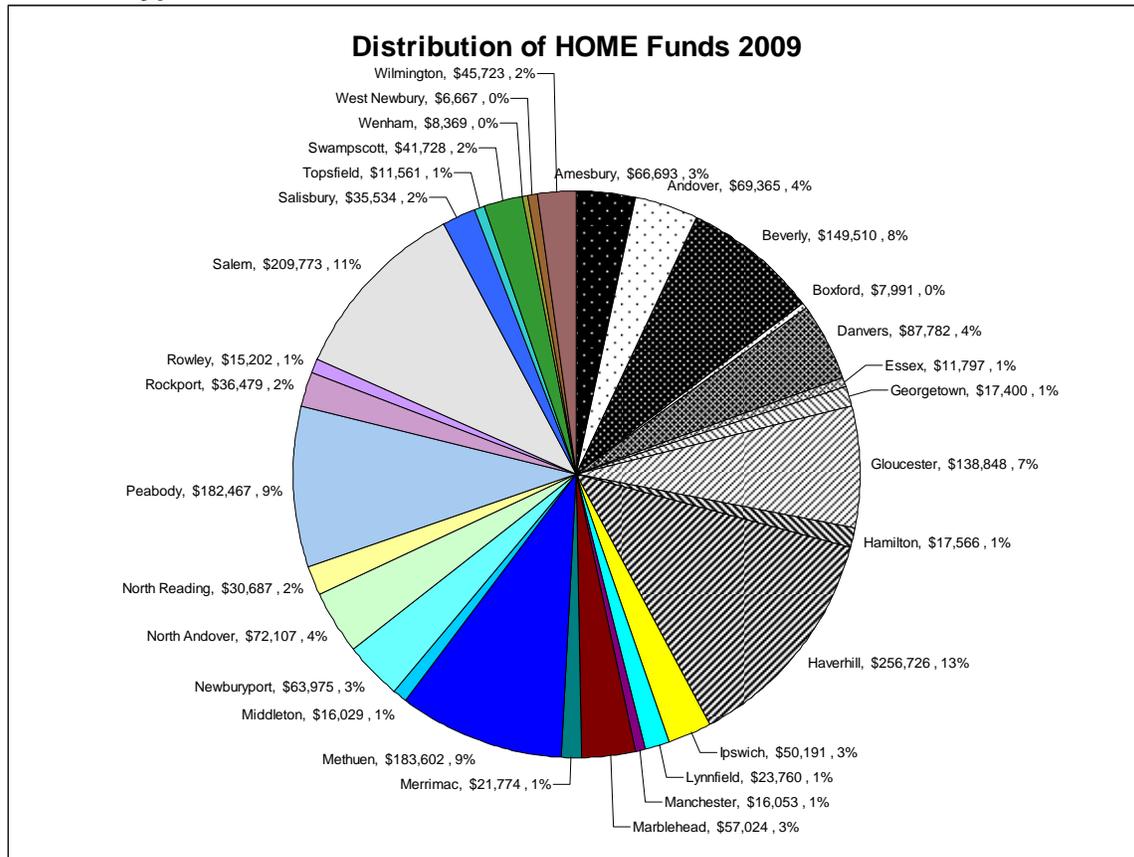
Each year the NSHC staff works with a committee made up of five representatives from member communities. Together they evaluate the funding priorities set the previous year and evaluate the efficiency and effectiveness of the programs and activities that were funded under that system. The committee then creates and recommends priorities for the new year taking into account the economy, the amount of funding available, and the outcome of the previous programs. These priorities are then incorporated into the subsequent year's Action Plan and into the Request for Proposals for the Consortium's Competitive Funding Pool of Funds. The Consortium distributes the funding received from HUD as follows:

1. Each year, an initial amount of \$300,000 is set aside from the HOME allocation for projects to be funded through a Competitive Funding Process. The Allocation Committee releases an RFP, evaluates proposals received, and rates each submission based upon the established priorities as well as other considerations; This amount is typically increased by the addition of uncommitted funds from communities (see step 3 for more on this)
2. 10% of each year's total annual allocation, or approximately \$237,000, is set aside for Planning and Administration of the HOME grant. Approximately 5% is utilized by the Consortium for oversight of the program and 5% is utilized by the communities and subrecipients for their administration of the programs;
3. The remaining amount (approximately \$1,833,000) is distributed among each of the 30 communities using a formula based on the number of low-mod households identified in each community (utilizing figures from the 2000 U.S. census). Communities have one year to commit funds to activities, and any uncommitted funds at the end of that period are reallocated to the Competitive Funding Pool (see #1, above)
4. Program income is estimated to generate about \$200,000 per year. It has been the Consortium's policy to return program income to the community whose investments in housing generated it. If not committed within one year, those funds are also reallocated to the competitive funding pool.

Within any community, funds are not allocated based on the percentage of low-mod persons in a neighborhood. However neighborhood analysis may be one factor which an individual community might use when making decisions for the distribution of home assistance.

The following chart illustrates the distribution of funds for 2009 which is typical.

Chart 1: Typical Distribution of Funds



3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.

The primary obstacle to meeting the underserved housing needs of low-income and moderate-income populations in this region continues to be a lack of funds. When considering the scale of the problems identified in the Housing Needs Analysis and the Housing Market Analysis sections of the Five Year plan, the funds currently available to help address these numerous needs is not close to the amount needed. Organizations serving low income populations continue to experience significant and increasing demand for their programs, and thus the need to stretch their limited funding to serve greater numbers of clients. In many instances there are additional stresses on their systems due to reductions in state aid to local budgets, leaving many worthy and valuable programs unfunded or underfunded.

An additional obstacle for a large percentage of low income households in the region is the lack of adequate, sustainable employment. Also adding to the problem is the lack of understanding in many areas of how the labor economy is connected with the availability of a variety of housing types, including rental and affordable housing.

The Analysis of Impediments to Fair Housing study completed by the NSHC in 2008, also identified a lack of understanding of Federal and State Fair Housing laws and of the difficulties families with children are having in obtaining housing.

The NSHC will continue to work with and support public non-profit agencies such as local housing authorities, human service organizations, Councils on Aging and other elder service organizations, homeless providers and other special needs providers, in their mission to meet the needs of the underserved population of the area.

The NSHC will continue to communicate with these groups as their needs change or the demand changes. Wherever possible, the NSHC will provide technical assistance and support to providers in their pursuit of federal, state and other funding sources.

Moreover, the NSHC actively educates communities about ways to remove barriers to the development of affordable housing and promotes proven programs. It will continue these efforts in the future.

4. Identify the federal, state, and local resources expected to be made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.

Based on past experience, the NSHC anticipates that member communities will use a variety sources of funds for the year 2011-2012.

Federal Funds

All of the 30 NSHC communities make up the Continuum of Care which through the McKinney-Vento program and other sources provides significant funding for the homeless. Some of the communities are CDBG entitlement communities while others received funds from the

Commonwealth of Massachusetts CDBG allocation administered by DHCD. Some of the communities have Federal public housing while most have HCV allocations for rental vouchers. From time to time some of the communities receive other Federal assistance such as Section 202, Section 811, NSP, DOE and DOT funding, which are often used in conjunction with HOME funds.

It is estimated that the total Federal funds which might become available between the 30 communities will be in excess of \$65m.

State Funds

Most of the communities have State public housing and some have State rental vouchers. In addition, the State has the HSF and HIF programs which are almost always used with HOME funds. The State also provides LIHTC funding, which some of the communities have used from time to time.

It is estimated that the total State funds which might become available between the 30 communities will be in excess of \$35m.

Local Funds

Several of the communities have CPA and Inclusionary Zoning funds, which they almost always use in conjunction with HOME funds.

It is estimated that the total Local funds which might become available between the 30 communities will be in excess of \$12m.

Managing the Process

1. Identify the lead agency or entity for overseeing the development of the plan and the major public and private agencies responsible for administering programs covered by the consolidated plan.

The lead agency for overseeing the development of the NSHC Consolidated Plan as well as its administration and reporting to HUD is the City of Peabody with its Department of Community Development carrying out the day-to-day management of the program. The City of Peabody sets aside ten percent of the total HOME allocation for administrative costs, with 5% allocated for the direct administration of the Consortium and 5% for administrative expenses of communities which use HOME funds.

The Community Development and Planning Departments (or other departments, as applicable) of the 30 Consortium member communities are the key public agencies administering the programs covered by the Plan. In addition, housing providers who are direct recipient of HOME funds through its' competitive funding process also administer programs under the Plan. These typically include designated Community Housing Development Organizations (CHDOs), local CAP agencies and various private non-profit organizations involved in housing development and the associated services for their clients who are homeless, elderly, disabled, or victims of domestic violence.

The major homeless needs in the area are primarily serviced through the **Gloucester/Haverhill/Salem/Essex County CoC** using McKinney-Vento funding. The lead agency for the CoC is also the City of Peabody, so there is close relationship between the work of NSHC and of the CoC, as well as a sharing of staff. The key agencies currently responsible for administering programs under the McKinney-Vento program are the following:

- North Shore Community Action Program, Inc.
- Turning Point, Inc.
- Life Bridge.
- Lynn Shelter Association
- Haverhill Housing Authority
- Emmaus Inc.
- Veterans Northeast Outreach Center
- Action Inc.

It should be noted that the North Shore HOME Consortium's Allocation Committee, in determining which programs to select for HOME competitive funding awards, has created a priority for those affordable housing development proposals that serve the homeless. This decision strengthens the relationship between McKinney-Vento and HOME in an effort to have a greater impact in addressing the housing needs of the homeless.

2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations and others who participated in the process.

The staff of the North Shore HOME Consortium, acting through the City of Peabody's Department of Community Development, oversee the development and management of the Five Year Consolidated Plan and each year's annual Action Plan. The NSHC has also drawn from its many years of experience in administering the HOME program and in submitting such plans to HUD. Community members and groups interested in the development of affordable housing were made aware of the development of the Plan by advertisements and public notices and were invited to submit suggestions, ideas and requests for support. Other key partners in the NSHC's planning are the three CHDO's which are based in Haverhill, Peabody and Salem. Various providers of services to the homeless were also consulted during the year and during this specific planning process.

The Action Plan was also discussed at the NSHC monthly meeting of its member communities in order to provide an additional opportunity for feedback on the priorities and need in the region.

This process will continue during each year, as local communities make final decisions about the award of HOME funds and as the competitive process for other funds is undertaken.

3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.

The Consortium will continue to work closely with its non-profit partners to both monitor the success of existing programs and generate ideas for new programs to serve the changing needs of the Consortium's low income population. The Consortium staff will meet with sub grantees during the year to assess the existing program and discuss changes needed as well as ideas for new directions. The staff will meet with non-profit and public housing providers to reassess needs and opportunities.

Citizen Participation

1. Provide a summary of the citizen participation process.

Statement of Policy

The NSHC has adopted a Citizen Participation Plan which establishes

the process by which the 5 Year and Annual Action Plans are designed and developed in consultation with the general public. The Consortium also encourages citizens to participate in the development of any substantial amendments to the Consolidated Plan and required Consolidated Annual Performance and Evaluation Report (CAPER). The full CP Plan has been submitted as an attachment to this Action Plan.

In summary, the Consortium held community meetings which were advertised widely to invite feedback on the activities undertaken during the last year, and to ask for input for the creation of the new plan. Following that, public hearings were held to allow feedback on the draft Action Plan. All feedback is incorporated into the final Action Plan.

Public Meetings in Development of the 5 Year Consolidated and Annual Action Plan

The Consortium's approach to citizen participation this year has been to continue and where necessary, improve upon, the process used in prior years and described above. Groups active in areas which use or could use resources were made aware of the process, by advertisements and public notices. Over 150 different organizations and agencies were invited to both the community meetings and public hearings and to send in comments through direct mail and/or email.

The planning and citizen participation activities for these plans generally begin in November of the preceding fiscal year, utilizing community outreach meetings. These meetings are conducted for the purpose of soliciting public comment and include information for project proposals relative to community needs and program priorities for the annual plan.

The meetings, widely advertised throughout the Consortium by email and website announcements, were also advertised in the following media on January 31, 2011 and March 24, 2011: The Salem News (serves most of the North Shore), The Eagle Tribune (covers Merrimack Valley), the Gloucester Times, The Newburyport News, and the Wilmington Town Crier. Also ads were placed in the Bay State Banner and El Mundo, the two minority newspapers in the region.

Meetings were held as follows:

Community meetings were conducted in two different geographic areas, to facilitate attendance of the NSHC participant communities. The advertised community meetings for public input were conducted as follows:

1. At the Sawyer Free Public Library in Gloucester on February 15th, 2011 at 10:00 a.m., and
2. In Peabody at the Peabody City Hall on February 17th 2011 at 3:30 p.m.

The draft Plans were made available on March 24, 2011 at the offices of the City of Peabody Department of Community Development located at 24 Lowell Street Peabody and to the Planning, Economic, Housing and Community Development departments (or other similar offices, such as Board of Selectmen offices) of NSHC member municipalities. The draft Plans were also made available online at www.peabody-ma.gov and by request during the 30 day public comment period. Additional outreach and advertising was done to solicit feedback on the contents of that document.

Two Public Hearings were conducted to allow the public an opportunity to come and discuss the Second Year Action Plan. Those meeting were held:

1. At the Sawyer Free Public Library in Gloucester on April 12th, 2011, at 2:00 p.m., and in
2. Peabody at the Peabody City Hall on April 14th, 2011 at 4:00 p.m.

2. Provide a summary of citizen comments or views on the plan.

In response to the release of the draft Action Plan, useful feedback was received. On April 12th, at the Public Hearing in Gloucester, North Shore Resident and Executive Director of the Gloucester-based North Shore Health Project, Susan Oleksiw, attended in order to voice her support for the continuation of Tenant Based Rental Assistance Programs and for the need to create additional affordable rental housing for very low and extremely low income clients. Ms. Oleksiw stressed the dire circumstances of some of her clients, living with Hepatitis C, who would be unable to receive treatment for their illness and would likely die without the TBRA assistance currently being provided. She explained that medical professionals will not administer the debilitating regimen of medications required to cure this illness to someone without a stable home environment, and that in many cases

people become unable to work due to the strain it temporarily puts on their bodies, so they also need a way to keep their home after beginning treatment. The TBRA assistance allows these individuals to fully concentrate on getting better over the short term and allows them to get back on their feet and return to the workforce and to independence.

At the April 14th Public Hearing in Peabody, Nancy Porcaro, the Executive Director of the Peabody-based Citizens for Adequate Housing, Inc., attended in support of the NSHC Action Plan. Ms. Porcaro commended the Consortium in its goals of creating new affordable rental housing for low and extremely low income households. She explained that the residents of her shelter and transitional housing programs have extremely limited incomes, and even what is considered affordable rent in this region is far out of reach to these women. She stated that there is a great need for housing needs development for extremely low income households in order to create some movement of families out of shelters.

All comments received have been accepted and incorporated into the final version of the Second Year Action Plan.

3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.

A concerted effort is made to increase the participation of low and moderate-income persons. Particular efforts are made to encourage participation by people of predominantly low and moderate income. The key to this is to have public meetings in major centers of the region. The existing formal Citizen Participation Plan delineates the specific approach used.

If, at any time, it is anticipated that a significant number of non-English speaking residents can be reasonably expected to participate in public meetings or participate in the planning and evaluation process of the Consolidated Plan, an interpreter will be secured. Also, the hearings will be held at times and locations convenient to potential and actual beneficiaries, with accommodations for persons with disabilities as needed.

A key strategy is to work closely with social service, housing and economic agencies in the region. These agencies serve as communication conduits to many of these populations, due to their established relationships with their clients and other agencies which serve minority, disabled and non-English speaking persons.

The NSHC has always involved local organizations which have specific ties to or whose members comprise minority, non-English speaking or disabled persons. Sources utilized for this plan which fall into these categories are as follows:

1. all jurisdiction-based non-profit and CHDO organizations.
2. most jurisdiction-based public service agencies.
3. housing authorities.
4. faith-based organizations.
5. municipal websites.
6. posted public notices in city and town halls.

4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

The Consortium has made a good faith effort to incorporate the comments received during the preparation and submission of the plan. In some instances, the comments received are not relative to the use of HOME funds or related to the goals of developing affordable housing in the region, In addition, financial resources are limited, therefore not all needs identified can be addressed. The citizen participation process including the schedule of meetings, consultations throughout the year and public hearings, were conducted and publicized to maximize participation. All comments were considered in the preparation of these plans.

As noted in item 2 above, the public hearing comments received were addressed and/or incorporated into the Plan.

Institutional Structure

- 1. Describe actions that will take place during the next year to develop institutional structure.*

Error! Reference source not found. Action Plan Institutional Structure response:

As more than three quarters of the annual allocation are made available to the member communities, the working relationship between the Peabody Community Development staff and local communities is critical. A key element of this relationship is to ensure that a community which is being funded has the capacity to create and manage programs.

NSHC, in its distribution of HOME funds is only one piece of the delivery system. In addition, nonprofit and for-profit developers and service providers, along with private lenders are also stakeholders. The provision of coordination and support in these efforts to leverage and manage the limited resources from these various stakeholders is in part, provided by NSHC. With the increasing need for funds and the limited resources available, ensuring that selected subrecipients can effectively and efficiently complete their projects has become even more critical.

Monitoring

- 1. Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.*

There are two aspects to ensuring long-term compliance with program and comprehensive planning requirements. One is the monitoring of sub-recipients; the other is monitoring specific completed HOME funded projects for compliance with the HOME Program required inspections schedule, as well as recertification monitoring for income and rent compliance.

The NSHC, through the City of Peabody Department of Community Development, ensures compliance with federal HOME regulations through a comprehensive monitoring process. Staff monitors all sub-recipients by clearly delineating the outcome measures of programs and by working collaboratively with each of its sub-grantees.

The purpose of the monitoring process is to evaluate performance with regard to:

- a. Meeting production goals;
- b. Compliance with HOME program rules and administrative requirements;
- c. Timely use of funds;
- d. Prevention of fraud and abuse of funds;
- e. Need for technical assistance;
- f. Evidence of innovative or outstanding performance

As part of the performance assessment of each project, the NSHC reviews the following:

- Progress of individual activities funded with HOME funds;
- Audits that are reviewed by NSHC staff on a periodic basis to determine if the agency is operating its programs in a fiscally responsible matter and if there have been any findings relevant to the HOME funded project;
- Required backup documentation for submitted administrative and project delivery cost invoices;
- Compliance (for projects with 5 or more units) with the Affirmative Marketing Plan;
- Inspection of a sample of units to confirm that they meet HQS standards;
- Review of selected unit information to ensure that, for any acquisition and/or rehab project, property values do not exceed the 95% of the area section 203(b) limits.
- Review of a sample of resident records to ensure that households meet required income limits.

The monitoring process for HOME follows closely the goals, outputs, outcomes, and evaluation measures stipulated in the Consolidated Plan and in all contracts with sub-grantees and other providers.

As an entity comprised of thirty communities, the Consortium has completed more than two thousand activities developed within its region since its inception. Due to the large number of projects and recipients and small number of staff, the Consortium contracted with a consultant to handle the monitoring responsibilities. This approach has been used successfully for the past five years. The Consultant is an organization with over twenty years of experience in monitoring federally funded affordable housing for compliance with federal

requirements. The Consultant continues to conduct on site inspections of Consortium sub-recipients to ensure that their programs and actions are in compliance with HOME program and Consolidated Plan requirements. In addition, the Consultant has conducted on site inspections of affordable rental housing units assisted under the program to determine compliance with housing codes, income guidelines, and financial management guidelines. Results of these inspections are sent in the form of a letter to the sub-recipients, with recommendations and suggestions on how to correct any possible "findings", and a forty-five day response period is given for adherence to those corrective actions. At the end of that period the activity is reviewed and the corrective actions taken are noted for the files.

Davis Bacon Compliance:

In addition, staff oversees federally funded projects which require Davis Bacon compliance. The agreements include all necessary information that must be included in a sub-recipient's contract for construction projects including:

- HUD Form 4010 – Federal Labor Standards Provisions
- U.S. Department of Labor Payroll forms
- the appropriate wage determination
- a copy of the "Notice to All Employees" poster, to be posted at job site
- a copy of the "Contractor's Guide to Prevailing Wage Requirements for Federally-Assisted Construction Projects", which is to be provided to the prime contractor

NSHC's staff conduct site visits, conduct employee interviews and check the weekly payroll forms for accuracy and compliance.

Section 3 Compliance

The purpose of Section 3 of the Housing and Urban Development Act of 1968, is to provide economic and employment opportunities to low- and very-low income individuals to the "greatest extent feasible" and businesses that are majority owned by Section 3 residents or whose permanent, full-time employees are 30% Section 3 residents or are businesses that contract in excess of 25% of subcontracts to such Section 3 businesses. Recipients of HUD funds in excess of \$200,000 and individual contracts or subcontracts in excess of \$100,000 are subject to Section 3.

If the NSHC issues a contract in excess of \$100,000 it will require a Section 3 plan from the contractor and will monitor that plan to ensure that businesses used and individuals hired are used to the greatest extent possible as delineated in that plan.

Fair Housing Compliance

Monitoring for Fair Housing Compliance is integrated as a component of the sub-recipient and project monitoring performed by the Consultant, as described above in this section.

Lead-based Paint

- 1. Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.*

The key strategies for addressing the problem during the next year are as follows:

1. Encouraging Consortium communities, especially their boards of health, to provide local information booklets and outreach programs to make residents aware of lead based paint hazards and to generate referrals for lead based paint identification and abatement.
2. Making residents aware of the MassHousing "Get the Lead Out" program which has been available to low and moderate income homeowners and investors who need financial assistance with lead based paint abatement. The state has limited the eligibility to properties which have an occupant who has been diagnosed and enrolled in the case management system of the DPH.
3. Encourage code enforcement which can lead to homes being de-lead.
4. The NSHC also tests for and addresses lead contamination during the course of its rehabilitation activities, which it will continue to do.

5. All affordable housing owned by the Consortium's Housing Authorities is lead safe as are all other units developed under HOME funding and other subsidized housing programs, such as CDBG, HSF, HIF, LIHTC.

HOUSING

Specific Housing Objectives

*Please also refer to the Housing Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve over the next year.

The priorities and specific objectives for the Annual Plan (2011) are as indicated below.

OBJECTIVE A: DEVELOP AN ADEQUATE SUPPLY OF SAFE, DECENT RENTAL HOUSING THAT IS AFFORDABLE AND ACCESSIBLE TO RESIDENTS WITH A RANGE OF INCOMES INCLUDING THOSE WITH SPECIAL NEEDS			
Strategies:	Target Population	1 Year Priority	1 Year Goals
1. Assist in creating or preserving 55 affordable rental units	Households below 60% of AMI	HIGH	55
2. Ensure that deep enough subsidies are in place to make a percentage of units truly affordable to very low and extremely low income households and the homeless	Extremely Low Income (<30% AMI), Very Low Income (30%-50% AMI)	HIGH	
3. Ensure that a percentage of the units created are accessible to persons with disabilities	Disabled persons	HIGH	
4. Provide tenant-based rental assistance to 75 low-income households, including	Households including those with Special	HIGH	75

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those with special needs	Needs below 60% of AMI		
5. Develop partnerships with housing providers who create housing for special needs populations	Special Needs Households	HIGH	

OBJECTIVE B: REDUCE INDIVIDUAL AND FAMILY HOMELESSNESS

Strategies:	Target Population	1 Year Priority	1 Year Goals
1. Coordinate a high quality continuum of care system for the region with a focus on ending homelessness	Homeless	HIGH	
2. Channel HOME funds to activities that create permanent and transitional affordable housing units for homeless persons	Homeless	HIGH	
3. Provide tenant based rental assistance to homeless and at risk households	Homeless	HIGH	

OBJECTIVE C: PRESERVE, MAINTAIN AND IMPROVE THE EXISTING STOCK OF AFFORDABLE HOUSING, PARTICULARLY UNITS OCCUPIED BY EXTREMELY LOW AND VERY LOW-INCOME HOUSEHOLDS

Strategies:	Target Population	1 Year Priority	1 Year Goals
Rehabilitate and/or remove barriers to accessibility for 18 housing units, including units owned by elderly persons, disabled persons, and other special needs groups	Elderly, Disabled and Special Needs at or below 80% AMI	HIGH	18

OBJECTIVE D: EXPAND HOMEOWNERSHIP OPPORTUNITIES FOR LOW-INCOME HOUSEHOLDS

Strategies:	Target Population	1 Year Priority	1 Year Goals

North Shore Home Consortium

1. Provide down payment assistance to 27 low to moderate income households to allow them to become homeowners	Extremely Low Income (<30% AMI), Very Low Income (30%-50% AMI) and Low Income (50%-80% AMI)	HIGH	27
2. Create 2 new affordable homeownership units for very low income households	Very Low Income (30%-50% AMI) Households	HIGH	2

2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

The Peabody Department of Community Development and the Consortium member communities, make special efforts to identify federal and state programs that can be used in conjunction with HOME funds. Four Consortium communities (Gloucester, Haverhill, Peabody and Salem) are designated as entitlement communities for Federal CDBG funds and utilize their allocations funds to address the needs in their communities, from housing and social services need to economic development projects. Although the Consortium has also received Federal funds through the American Dream Downpayment initiative [ADDI] Program in prior years, this program has been discontinued.

Although no community within NSHC received HPRP funds directly, those available from the state are being used in several communities for activities directed to preventing homelessness and rehousing. In addition Haverhill and Salem have received funding through the Neighborhood Stabilization Program.

The NSHC jurisdiction is fortunate to have 3 active Community Housing Development Organizations (CHDOs). These organizations, located in Haverhill, Peabody and Salem, can conduct activities anywhere in the Consortium area. They have been active in using HOME funds in conjunction with other sources, especially state housing funds and private funds. The NSHC expects these collaborations to continue in the next year.

NSHC member community staff work with developers and affordable housing groups to encourage affordable housing through use of HOME funds. These developments typically work with other public and private sources. Typical resources being used include Federal CDBG and McKinney-Vento funds, HCV and programs such as Section 202 and 811. Communities also use State funds which often include HSF and HIF housing and community funds and sometimes there will be a LIHTC allocation. Locally, many communities have CPA and Inclusionary Zoning funds which are available for housing. More often than not these are combined with HOME funds. Private lenders are also active in providing mortgages and development loans.

However there has been a significant reduction in state and local revenues and programs which in turn has led to a reduction of funding for some of these programs. Moreover the decline of loans from financial institutions, especially for low and moderate income households and developers, makes it an uncertain time and difficult for leveraging resources.

Needs of Public Housing

1. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.

The NSHC has extremely limited resources to assist the needs of PHAs and their clients, especially when compared with the needs of those who do not have access to affordable housing.

It continues to support the PHAs which have residents and participants who apply for homeownership assistance, focusing on those coming out of Family Self Sufficiency programs. In addition it intends to work closely with the efforts of the 8 PHAs which have HCV Homeownership programs and to encourage those which don't, to amend their PHA Plans to create such a program. In addition, while none of the 7 PHAs with federal public housing, have adopted a Section 32 homeownership program, the NSHC will be working to encourage them to do so, especially as a recent HUD study indicated that one of the more successful homeownership production collaborations, has been between PHAs and HOME PJs.

The NSHC will also work with the State and the 16 PHAs which have Housing Choice Voucher allocations, to develop project-based Section 8 projects. As the HUD regulations permit up to 20% of the allocation to be used for this purpose, this has the potential for developing more than 770 affordable housing units.

2. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

No housing authorities in any of the NSHC 28 communities with PHAs have been designated as troubled. The assessment scores of both federal and state agencies indicate that none are performing poorly.

Barriers to Affordable Housing

1. Describe the actions that will take place during the next year to remove barriers to affordable housing.

There is a state law [Chapter 40B] that requires local governments to have at least 10% of its housing stock affordable to households below 80% of median in order, to retain full control over the zoning permit process when affordable units are proposed. The nature of that affordability is defined by the state and generally must be for at least 15 years for homeownership and 30 years for rental units. The law gives the state the power to override local decisions regarding affordable housing projects, whether those decisions are based on zoning by-laws, or other arguments such as impact on schools, environmental issues, infrastructure limitations etc. A local community can amend its by-laws and procedures for a specific project and gain exemption from this law under what is known as and what is controlled by state regulations – Local Initiative Plan or LIP. Moreover, as noted above, a community can adopt a Housing Production Plan [HPP], which provides incentives for the development of affordable housing. The current status of each community in terms of the Chapter 40B law is delineated more fully in the 5 Year Strategic Plan.

The NSHC encourages local communities to pursue any strategy which enables affordable housing production. Throughout the year, speakers

will be invited to address the members of the Consortium on a variety of issues. These may include representatives from state agencies and/or housing advocacy groups.

Representatives from the banking community have expressed their support for affordable housing – and will continue to be invited to present their products. Local nonprofit developers will be given the opportunity to describe their plans to a diverse audience (including public officials). In the past the Consortium’s series of Fair Housing Forums created new dialogues among local public officials and others.

These meetings are intended not only to inform the general membership about specific issues, but also to keep the topic of creating affordable housing in the forefront of our discussions. It has been found that one issue may “capture the imagination” of a public official, a volunteer or a new representative to the Consortium. In providing for the seeds of different ideas, actions can and do create results.

HOME/ American Dream Down payment Initiative (ADDI)

1. Describe other forms of investment not described in § 92.205(b).

None are proposed this year.

2. If the participating jurisdiction (PJ) will use HOME or ADDI funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.

Resale Restrictions are administered by the North Shore HOME Consortium.

The Consortium has adapted to changes in the housing market and has adopted new policies for the homebuyer assistance programs within this jurisdiction. These policies - along with the added flexibility that they bring to local homebuyer assistance programs - will remain in effect over the next five years.

(1.) It has been the policy to provide assistance to income-eligible homebuyers in the form of a loan at a zero interest rate with no monthly payments. The Consortium’s policies adhere directly to the HOME regulations on this issue, the only local provision which has

been added to that is that the homebuyer assistance has been made available to first-time homebuyers. On the federal level the HOME regulations have changed to allow for this assistance to be made available to *any* income-eligible buyer (i.e., whether a first-time buyer or not).

When the property is sold, the entire amount loaned must be repaid to the lender. The lender has typically been an individual community (city or town) as a member of the Consortium. Then, as HOME regulations require, the funds are returned to the local Home Investment Partnerships account in Peabody. It has been the Consortium's policy to allow such repayments to be re-cycled back to the community where the assistance occurred in order to continue to fund the same activity.

Other eligible uses of such repayments may be considered with the approval of the Consortium concerning the consistency of such activities with the Consortium's Consolidated Plan.

(2.) The new policy developed by the Consortium has imposed resale restrictions on certain homebuyers for specific projects where the preservation of long-term affordability is a concern. In the instance of a publicly-assisted development - for example - that created affordable units for an extended period, a community may negotiate the continued affordability of a portion of the units that could otherwise be lost to an "expiring use". In such cases, in order to preserve the long-term affordability of these units, deed restrictions will be imposed, along with close adherence to all HOME regulations governing this use of funds.

The recapture policies will, at a minimum, meet programmatic requirements for the duration of affordability. Extended periods of affordability of between fifteen and thirty years may be anticipated. At this writing, the Consortium does not intend to seek a portion of the appreciation in value of a HOME-assisted unit (based upon a pre-determined formula), but may consider alternatives in the future.

3. If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt.

No refinancing is proposed in the first year.

4. *If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives.*

ADDI has been discontinued.

HOMELESS

Specific Homeless Prevention Elements

*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

Action Plan Special Needs response:

1. Sources of Funds—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction's plan for the investment and use of funds directed toward homelessness.

NSHC and the Continuum of Care are serving basically the same communities. In the next year, the NSHC communities anticipate receiving \$1,498,197 through the McKinney-Vento program, to support emergency shelters, transitional and permanent supported housing. At the state level, assistance is provided by the Department of Housing and Community Development (DHCD) through the Division of Housing Stabilization and by the Department of Transitional Assistance (DTA). the Supportive Services component may be provided through the Executive Office of Health and Human Services. Non-profit agencies continuously look to private grants and foundations to fill financing gaps.

The NSHC has stated repeatedly that addressing the needs of homeless families and individuals is among its top priorities. The NSHC has set specific one year and five year goals in channeling HOME funds to activities that create permanent and transitional affordable

housing units for homeless persons and providing TBRA to homeless and at risk households. In addition, some of the Consortium's member communities also allocate CDBG funds to provide housing and services for the homeless.

2. Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.

The following are the major strategies used to address the needs of the homeless and to prevent homelessness.

1. Prevention: Both the federal and state governments have recognized prevention as a key element in the fight against homelessness. At the federal level, The Homeless Prevention and Rapid-Re-housing Program (HPRP) has been developed as a critical tool in this initiative. Although no communities in the Consortium received direct funding, a number of Consortium communities and service organizations are utilizing HPRP funds received and administered by the state. At the state level, based on recommendations from the Commission to End Homelessness, Massachusetts has created and funded the Interagency Council on Housing and Homelessness (ICHH), which in turn has funded multiple regional housing networks across the state to deal with the spectrum of homeless issues, beginning with the at-risk population.
2. Coordination: The NSHC intends to maximize the cooperation and participation among the communities involved in the Continuum of Care Process through its regular monthly meetings. In addition to working closely with its member representatives, the Consortium now has in place two regional housing networks, funded through the Interagency Council on Housing and Homelessness (ICHH). As mentioned above, as one of its primary responsibilities, ICHH has funded regional housing networks as of December, 2008. Their mandate is to help better coordinate, integrate and implement innovative services focused on securing permanent housing options for homeless individuals and families and ultimately lessen the need for emergency shelters.

The Regional Networks servicing the Consortium Communities include the Merrimack Valley Regional Network (Methuen, Haverhill, West Newbury, Andover, North Andover, Salisbury, Amesbury,

Merrimac and Newburyport) and the North Shore Housing Action group (Georgetown, Rowley, Boxford, Middleton, North Reading, Lynnfield, Swampscott, Marblehead, Salem, Essex, Hamilton, Ipswich, Gloucester, Rockport, Manchester, Lynnfield, Peabody, Beverly, Danvers and Topsfield). Please note that Wilmington is part of the MetroBoston Regional Network. Goals and objectives as they relate to specific components of homelessness activities are described in the individual sections below.

3. Data Collection: Improve the accuracy of counting the homeless and their demographic characteristics so that the resulting planning and programming accurately addresses the most critical needs.
4. Housing: Increase the supply of permanent supportive housing option for the homeless by supporting the efforts to of local nonprofit organizations to secure available local, state and federal funding.
5. Services: By working with the participants in the local Continuum of Care – including state agencies and private service providers - work to improve the system of treatment and services for homeless individuals with multiple diagnoses. Individual efforts will be made to ensure that clients are assessed correctly and connected to appropriate services.

It is acknowledged that the best practice for eliminating the need shelter for homeless households is to prevent homelessness whenever possible through intervention with at-risk individuals and families. For those who require emergency shelter, the intent is to get them connected with the necessary services and resources to move them from that emergency setting quickly. Ideally that move would be to an independent permanent living situation. However, in some instances the first move may have to be to a transitional housing setting where they can continue to receive supportive services for a longer period if the household is not yet capable of living independently. For those who still are unable to move on to an independent permanent housing situation, the only solution is to provide permanent supported housing so that formerly homeless households will be able to maintain their housing for the long term.

In order for this goal to be achieved, there must be an adequate supply of appropriate, affordable housing and the associated stabilization services. To create the necessary emergency shelter,

transitional housing and permanent supportive housing to meet the needs identified in the region, a combination of resources must be assembled. Actual units must be created and rental subsidies (which include mobile vouchers, project-based subsidies and/or vouchers) must be made available for defined populations (i.e., VASH, which are typically administered through local Public Housing Authorities and regional agencies) and funds must be made available for the necessary services which will allow people to live outside of the shelter system.

3. Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2012. Again, please identify barriers to achieving this.

The strategies identified below are central to the focus of addressing chronic homelessness. Chronically homeless individuals may also suffer from the effects of substance abuse and/or mental illness. A national homeless study conducted by the National Coalition for the Homeless indicated that 25 percent of the homeless suffer from mental illness and that 60 percent of homeless individuals are drug dependent.

The Continuum of Care has as one of its key objectives, the provision of permanent housing for chronically homeless. Its planning process includes outreach to the local governments of the cities that are part of the Continuum of Care. As mentioned above, there are two regional networks of homeless providers in the Consortium Area that have been designated by the ICCH. Community Teamwork, Inc. (CTI) is the convener of the Merrimac Valley Regional Network and NSCAP and the Lynn Housing Authority and Neighborhood Development are the co-conveners of the North Shore Housing Action Group. Both these groups identify a need to address the problems of chronic homelessness. Regional information, cooperation and new innovative strategies are expected to be particularly effective in impacting this problem. Improved data collection procedures will ensure that this population is correctly counted so that planning can be optimized. Appropriate discharge planning by mental health facilities, medical hospitals, substance abuse treatment centers and prisons and other correctional facilities are all key components in assisting chronically homeless. Members of the CofC participate in advocacy at the state level to insure that monitoring and discharge protocols are given ongoing priority. In conjunction with this outreach, every effort is made to connect the chronically homeless with benefits and resources

with the goal of achieving economic self-sufficiency, and this has met with a high level of success.

A cornerstone in the eradication of chronic homelessness is the provision of permanent supportive housing. The supportive services required may include personal case management, job training, and life skills preparation. For long term success, the CofC realizes that it must increase the capacity of current homeless housing providers to create and operate housing for this population. The second way to achieve success is to engage the larger affordable housing community to incorporate chronically homeless housing in their own housing plans. In addition to regular HCV's, there are a number of vouchers limited to special populations. In 2008, HUD provided funding to assist chronically homeless veterans through VASH Vouchers. The funding continues in place. These vouchers combine Section 8 rental assistance for homeless veterans, with case management and clinical services provided through the Veteran's administration. Veterans must already be homeless in accord with HUD's definition of homelessness. CTI administers the VASH vouchers in the Consortium area. According to CTI, as of March 1, 2010, 59 VASH vouchers for formerly homeless veterans are currently active in the area.

4. Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.

The breadth of the population dealing with the potential of homelessness has grown dramatically. Agencies throughout the area have seen a dramatic increase in those with long-term work histories at significant risk of losing their housing, due to unemployment and underemployment. A growing number of households have been at risk of foreclosure, either as part of the sub-prime loan crisis or due to economic hardship. As of March 1, 2010, there are 541 homes in default, 606 are bank owned and 437 are scheduled for auction in the NSHC area.

None of the communities within the North Shore CofC area received its own allocation of HPRP funds from HUD. However, Consortium communities are utilizing State allocated HPRP funds. NSCAP reports that it is currently receiving 500 calls per week from people who believe that their housing is at risk. NSCAP estimates that it has provided homelessness prevention services to 500 households between October, 2009 and January, 2010. Using HPRP funds and

other eligible resources, NSCAP is working with the local Housing Court to divert families at risk of eviction, resulting in homelessness. They also assist in paying arrearages or move-in expenses for individuals at risk. They have also used funds for short-term rental assistance. Emmaus, Inc., provider of emergency, transitional and supported housing, has received funds to provide temporary financial assistance and relocation and stabilization services to 10 homeless families. The Merrimack Valley and North Shore Regional Networks, both include diversion and preventions goals and activities in their workplans.

5. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.

The Continuum of Care which serves the homeless in the area, has adopted formal discharge protocols for facilities discharging people from foster care, health care, mental health care and correctional facilities.

Foster Care:

It is the responsibility and charge of the State Department of Children and Families to ensure that all youth with a discharge plan are discharged to appropriate and stable housing. There is a formal policy in place and implemented that ensures that youth are not routinely discharged into homelessness (including homeless shelters, the streets, or other homeless assistance programs). The DCF Standards for Independent Living Services specifically state that in no case may youth be placed in inappropriate housing. If appropriate housing is not available, the youth is not eligible for discharge from the States system of care. Appropriate housing is defined as all housing except shelters, hotels/motels, and dwellings that fail to meet government health and building code standards. Youth are routinely discharged through reunification with their families or, for those youth whose age allows, to another age appropriate independent housing option.

Health Care:

The Executive Office of Health and Human Services (EOHHS), the state agency with oversight of publicly-funded health care, has developed and implemented a formal policy in place that ensures that people are not routinely discharged into homelessness (including homeless shelters, the streets, or other homeless assistance programs) from state-funded health care facilities. EOHHS has established Discharge

Planning Standards, which are part of every Request for Proposal. These standards are reviewed during monitoring site visits, annual reports, review of the Department of Public Health (DPH) discharge and admission data, analysis of billing data, and Risk Management analysis. Programs that are funded by EOHHS/DPH are required to submit admission and discharge data on all clients, not just clients funded through EOHHS/DPH dollars, as well as billing and invoice data on all clients. EOHHS/DPH funded detoxification programs routinely discharge from their programs to state funded residential recovery programs or to state funded transitional support services.

Mental Health:

The State Department of Mental Health (DMH) has developed and implemented a formal policy in place (see regulation 104 CMR 27.09) that ensures that people are not routinely discharged into homelessness (including homeless shelters, the streets, or other homeless assistance programs) from state-funded mental health facilities. The Department of Mental Health routinely discharges clients to their state-funded system of group homes. All state-funded mental health facilities are required to arrange for the necessary post-discharge support and clinical services needed to facilitate a smooth reentry to the community. Such measures must be documented in the client's medical record. All mental health facilities are required to make every effort to avoid discharge to the streets or shelters. All facilities are required to take steps to identify and offer alternative options to patients and must document such measures, including all competent refusals of alternative options by a patient, in the medical record. In the case of such a discharge the mental health facility must arrange for or, in the case of a competent refusal, identify post-discharge support and clinical services. The facility shall keep a record of all discharges to a shelter or the street in the approved form and submit such information to the Department of Mental Health on a quarterly basis.

Corrections:

The State Department of Corrections (DOC) has taken a proactive approach to discharge planning and has targeted resources towards specialized housing with services to prevent inmates from reentering the corrections system and/or becoming homeless again. There is a formal policy in place and implemented that ensures that ex-offenders are not routinely discharged into homelessness (including homeless shelters, the streets, or other homeless assistance programs). DOC routinely discharges inmates to traditional residential placement in the

community. These include reunification with family, rental housing or state funded half way houses. The Department of Corrections issued a new policy in 2002 regarding the release preparation of inmates in their facilities. The policy includes the following components:

1. Developing individualized risk reduction plans.
2. Participation in transition workshops (minimum of five per year) initiated as the inmate approaches release which are designed to establish a comprehensive treatment plan.

Emergency Shelter Grants (ESG)

(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

Action Plan ESG response:

The Consortium is not a recipient of ESG funds and is not a state or a state agency. As a result this section is Not Applicable.

COMMUNITY DEVELOPMENT

Community Development

Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.

Action Plan Community Development response:

N/A

Antipoverty Strategy

1. *Describe the actions that will take place during the next year to reduce the number of poverty level families.*

Action Plan Antipoverty Strategy response:

As the Consortium is a HOME Participating Jurisdiction, it does not conduct specific economic development programs. However the Consortium does support any municipal efforts which provide housing improvements and preserve or promote affordability and thus enable low-mod households to set aside more resources for education and training.

In addition the Consortium makes itself available to support its member communities when preparing applications for economic development funding especially from the state CDBG program.

The NSHC has been targeting funds which more directly assist families in poverty as follows:

1. The NSHC has provided and plans to continue to provide TBRA. This short term rental assistance program is targeted to families who are being forced into homelessness by major reductions in income and loss of jobs.
2. The NSHC rehab program assists extremely low income families, many of whom are below the poverty level or could fall into that group, due to the costs of operating and maintaining their housing. This program targets repairs and utility efficiency.
3. Organizations which serve extremely low income households actively present projects for funding through the NSHC RFP process.

In so far as most households being provided housing assistance end up with a reduced level of cost, they are more able to allocate their scarce resources to other needs such as nutrition, education and other activities which can help lead them out of poverty

NON-HOMELESS SPECIAL NEEDS HOUSING

Non-homeless Special Needs (91.220 (c) and (e))

*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

1. *Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.*
2. *Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action*

Plan.

Action Plan Specific Objectives response:

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.

Throughout the Consortium, there are households in various subpopulations who are not homeless but have specific housing needs and may also require special attention due to their current or prospective service needs. These subpopulations include: elderly, frail elderly, persons with severe mental illness, developmentally disabled, physically disabled, substance abusers, victims of domestic violence, persons with HIV/AIDS and veterans.

The NSHC is aware of the needs of special populations and is committed to supporting initiatives which target these populations. NSHC has determined that one of the most effective strategies in assisting these populations is the provision of transitional and permanent affordable housing. In addition, several of these subpopulations' needs are being addressed through the use of Tenant Based Rental Assistance (TBRA).

NSHC has identified as a high priority the need to ensure that a percentage of the units created are accessible to persons with disabilities. NSHC will also continue to provide assistance to non-profit organizations serving these populations by assisting in providing funds for acquisition, the development and rehabilitation of structures designed to house victims of domestic violence, developmentally disabled, persons with mental illness and former substance abusers. NSHC considers all special needs populations. However, priorities are set based on demand from agencies serving these populations. NSHC is prepared to assist any developments proposed, when HOME funds are determined to be an effective source to meet special needs.

2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

In addition to the availability of federal public housing and other federally assisted housing programs for the elderly (primarily Section 202) and for the disabled (primarily Section 811 and PBA), Massachusetts is one of the few states which provides state-aided

public housing for the elderly, for the frail elderly and for the non-elderly disabled through DHCD. Monies for the development of housing for clients of DMH and DDS are also available to non-profits through the Facilities Consolidation Fund. Other state agencies serving the elderly within the Consortium include EOEA and the EOHHS. Massachusetts also has a variety of community-based programs serving the elderly. There are local Councils on Aging (COA) within the Consortium which provide elders and families with direct care services. The thirty communities are also serviced by Area Agencies on Aging, which are designated as 'Aging Services Access Points'. Programs implemented to meet the needs of elderly residents include subsidized housing; protective services (intervention in cases where there is evidence that an elder has been neglected, abused or financially exploited by someone in a domestic setting); home care; congregate housing; nutrition; guardianship; legal services; transportation; assistance with health care administration; and coordination services for the disabled elderly.

In addition to affordability, a key issue for the physically disabled has been the inaccessibility of housing units. Rehab funds available from the HOME Consortium have been used to create accessibility. In the Consortium communities that have entitlement or state CDBG funds available, physical rehabilitation programs are also available and are utilized for adapting housing to meet the needs of the physically disabled, as well as meeting ADA and Section 504 requirements.

The Department of Mental Health and the Department of Developmental Services are the primary service systems for providing services and housing (through the use of state and private housing providers), to their respective populations.

At the level of local government, communities have Public Housing Authorities, local Human Services departments, Veteran's Agents and local Councils on Aging, as mentioned above, all of which concentrate at least some of their services on these populations.

In addition to the use of public funds, non-profit providers of housing and services frequently seek private grants and funding from foundations.

Housing Opportunities for People with AIDS

Not Applicable. The Consortium does not receive HOPWA funds.

Specific HOPWA Objectives

Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the Action Plan.
Specific HOPWA Objectives response:

Not Applicable. The Consortium does not receive HOPWA funds.

Other Narrative

Include any Action Plan information that was not covered by a narrative in any other section.

Fair Housing

The City of Peabody - acting on its own behalf and serving as the "Representative Community" of the North Shore HOME Consortium – takes the obligation to affirmatively further fair housing choice very seriously. The North Shore HOME Consortium has completed a full update of its Analysis of Impediments to Fair Housing Choice in the latter part of 2007 with extensive outreach to every segment of the community. A series of public meetings were conducted in four of the Consortium's member communities. In addition, a survey of the general population was conducted. All participants were polled concerning their understanding of Fair Housing law and the actions to be taken in the event of a violation – or perceived violation - of fair housing law. The creation of this "AI" focused on both state and federal fair housing law and enumerated the requirements of each at all public forums. As a result a new AI was released in January of 2008 (Submitted to HUD at that time. An additional copy of the most current *Analysis of Impediments to Fair Housing Choice* was forwarded to the Fair Housing Equal Opportunity Office at HUD in August 2010)

This new AI identified the fact that there was a general lack of understanding and clarity on fair housing law. As a result, the AI recommended a series of education forums would be conducted through the Consortium's service area and focusing on certain "target" populations.

To implement this series of trainings, the Consortium (acting through the City of Peabody) issued a formal Request for Proposals in accordance with Massachusetts public bidding requirements [Chapter 30-B] and ultimately contracted with the Fair Housing Center of Greater Boston to assist in this extended education process. To date, four trainings have been conducted in different locations. Two of these focused on the staff and Boards of Directors of local housing authorities in this region, one focused on educating public officials in the Consortium's member communities, and one focused on local nonprofit organizations.

Two additional Fair Housing trainings are being scheduled for this year one to be held to educate lenders on the State and Federal Fair Housing laws (intended to include not only bankers but mortgage companies and others), and an additional training to educate public officials in the 30 Consortium communities on Fair Housing Laws. This latter training would welcome employees of our member communities (the thirty cities and towns) elected officials, appointed officials and volunteers in the communities. In the recent past, because local officials have not been clamoring to attend these trainings, we have also "opened-up" the trainings to invite some of our neighboring communities.

The act of educating the public on Fair Housing Law is a giant step toward eradicating housing discrimination. Once the public is aware that laws exist to protect specific groups of people, those who might discriminate will know that they are breaking the law if they act in a discriminatory manner, and those discriminated against will know that they are protected by the law and can speak out and fight back.

The City of Peabody and the North Shore HOME Consortium requires a Fair Housing Marketing Plan for any development that contains five HOME-assisted units or more.

The Consortium's general **Affirmative Marketing Plan** has been updated and submitted to HUD in August 2010. The Consortium is implementing new policies and procedures to expand its marketing to reach more minorities who do not speak English. This will include outreach to communities of faith and to local and regional nonprofit organizations that serve the non-English speaking population. Each developer of affordable Housing using HOME funds is required to submit their own specific detailed affirmative marketing plan as well.

Also, each HOME-assisted development is encouraged to use minority media publications that are utilized by the non-English speaking population.

The Consortium has held that serving the housing needs of the disabled and the elderly – as well as the disabled elderly - is one of the Consortium's top funding priorities. It has been the Consortium's practice to include these two populations in an annual Request for Proposals for the use of HOME funds, and to provide funding to viable proposals that serve the developmentally disabled (for example).

In recent years, a large scale development that prioritizes the needs of the homeless elderly has been partially funded by the Consortium in collaboration with Emmaus, Inc. of Haverhill and Elder Services of Merrimack Valley. At this site – Evergreen Place – twenty-two units of permanent housing has been created to serve the homeless disabled – with a priority given to those who are over 60 years of age. This development having been designated by the Consortium's Continuum of Care Alliance as the top priority *Supportive Housing Program*, received additional "Bonus Funds" through HUD's McKinney-Vento Homeless Assistance Grant Program.

Members of the professional staff of the Elder Services of the Merrimack Valley [ESMV] and North Shore Elder Services [NSES] are invited to attend the regular monthly meeting of the Consortium's Continuum of Care and do participate fully. In addition, members of the staff of the Independent Living Center of the North Shore and Cape Ann [ILCNSCA] are invited to attend these meetings and participate on a regular basis. These groups are also invited to provide input and feedback on the Consortium's Annual Action Plans and CAPERS, as well as the Five Year Consolidated Plan.

In an effort to comply with all of the Section 3 requirements of the CDBG Program and the HOME Program, the City of Peabody and the North Shore HOME Consortium have submitted complete and accurate reports to HUD as such reports have been required. Each one of the Consortium's sub-grantees is required to provide information concerning the use of Section 3 contractors whenever a single contract exceeds \$100,000. This reporting requirement includes all of the Consortium's thirty member communities and all of the nonprofit organizations and for-profit entities that may receive federal HOME funds. It covers any demolition activities, rehabilitation and new construction activities and related costs.

Because the vast majority of the HOME-assisted activities do not fall into this category because of their smaller scale, the numbers of projects reported upon has typically been relatively small. In order to improve our outreach efforts, in response to a suggestion by a consultant who specializes in issues around affordable housing and the associated Federal requirements, the Consortium has contacted twenty-one local housing authorities in this service area in an effort to share information and to compile a comprehensive list of Section 3 contractors which would be made available to all recipients of HOME funds. Although the outreach to the local housing Authorities on the Section 3 issue generated responses and discussion on the topic, most of the local housing authorities do not receive federal funding and were not familiar with the Section 3 requirements. The Consortium will continue to work with the HAs to try to identify a number of Section 3 Contractors and businesses and create a database for future reference and to share with the Consortium's member communities.

ATTACHMENT A

**CITY OF PEABODY
NORTH SHORE HOME CONSORTIUM
CITIZEN PARTICIPATION PLAN 2010-2014**

1. INTRODUCTION

This Citizen Participation Plan serves as the description of how the City of Peabody and North Shore HOME Consortium involve citizens in the process of developing their respective 5-year Consolidated Plans and will also serve as a guide for involving citizens in developing future Annual Action Plans and future Consolidated Plans. These Citizen Participation Plans utilize a multi-prong approach to reach and include the community and stakeholders. Particular emphasis is placed on encouraging effective involvement by citizens, particularly those who reside in low and moderate income neighborhoods, public officials (including municipal and public housing officers), and the interests of the private sector- particularly those involved in real estate development, and the nonprofit sector, including social service providers and advocacy organizations.

The City of Peabody and the North Shore HOME Consortium believe that the importance of citizen participation in programs goes far beyond simply meeting HUD's requirements. They encourage the involvement of people of color, people with disabilities, and people who do not speak English. It is clear that citizens themselves, along with the community groups serving the needs of these citizens, are the most familiar with the needs and assets of the communities and the strategies that will be most effective in making their neighborhoods a more enjoyable place to live and work. In addition, the quality of our programs and services is improved when the lines of communication are open between citizens and local government officials.

2. CITIZEN PARTICIPATION PROCEDURES

A. Notification of Public Meetings and Hearings

The public will be given advance notice of the availability of all Consolidated Plan documents and of public meetings and hearings pertaining to the Consolidated Planning process. The public will be given at least 14 day advance notice of any meeting or hearing. Public notice will take the following form:

- Advertisements or notices will be placed in the major newspapers serving the region at least 14 days in advance of a public hearing or meeting.
- Advertisements or notices will be placed on the City of Peabody Website at least 14 days in advance of a public hearing or meeting.
- Advertisements or notices will be placed in all ethnic and minority newspapers that serve a Consortium community or communities.
- A press release will be sent to all major press outlets serving the Consortium.
- The City and Consortium will maintain and update an e-mail list of interested citizens and organizations. Notices will be sent to those on the list as well as any individual and organization requesting to be included on the list.
- Included in the above list for notices will be all certified community development housing organizations, community action agencies, local and regional housing authorities, area agencies on aging, and those agencies serving persons with disabilities located in or serving the Consortium area.

B. Location and Format of Public Meetings and Hearings

The location of meetings and hearings are as important as the notification process. If the meetings are held in areas that are not easily accessible to low and moderate income residents, then citizens will be less likely to participate. The following steps will be taken to ensure that meeting locations are suitable:

- For the City of Peabody, at least two (2) public meetings and hearings will be held, and for the Consortium, at least three (3) public meetings and hearings will be held to ensure coverage of all geographical regions of the Consortium. The regional location for public meetings and hearings must include at a minimum the Merrimack Valley, Cape Ann, and Southern Essex County.
- All meeting locations will be accessible to people with disabilities. If an individual requires special services, the City and the Consortium will make a good faith effort to make the necessary arrangements to accommodate that person, as long as reasonable advance notice is given.
- Every effort will be made to locate meetings in places that are accessible by public transportation.

- At least one public meeting and at least one public hearing will be held in the evening to ensure that low and moderate income working persons can participate.
- Local communities or non-profit and community groups may be asked to co-sponsor meetings and hearings so that citizens see the partnerships that exist between the Consortium, member communities, and nonprofit organizations.
- The City and the Consortium will make a good faith effort to coordinate with the community co-sponsor to provide childcare services during the meeting or hearing.
- With reasonable advanced notice, translators will be provided for citizens who do not speak English or who require sign-language translation.

C. Availability of Documents

- The City and the Consortium will make information pertaining to the Consolidated Plan process available to any citizen within three (3) working days.
- The draft version of the Consolidated Plans, Action Plans, CAPER's, substantial amendments and related documents will be sent to non-profit and community groups that represent and advocate for low-income people. At a minimum, these community groups include certified community development housing organizations, housing authorities, community action agencies, area agencies on aging, and those agencies serving persons with disabilities located in or serving the City/Consortium area
- The draft version of the Consortium's Consolidated Plan, Action Plans, CAPERs, substantial amendments and related documents will be sent to the Community Development Departments of each member communities and will be available for the purpose of public inspection.
- The draft version of the Consolidated Plans, Action Plans, CAPERs, substantial amendments and related documents will be made available on the City of Peabody's Website.
- A written summary of all meetings and hearings relating to the Consolidated Planning process will be prepared and made available to citizens. The input provided at meetings and hearings will be reviewed and, as deemed appropriate, will be incorporated into the Consolidated Plan and Action Plans.

D. Citizen Participation Opportunities

Stage 1: Development of the Citizen Participation Plan

- Every five years, the City of Peabody and the North Shore HOME Consortium will evaluate its Citizen Participation Plan and re-submit it with the Consolidated Plan.

- When deemed appropriate by the City and the Consortium, a steering committee comprised of government staff, non-profit staff and community leaders will facilitate the process of reviewing and recommending changes to the Citizen Participation Plan.
- The Draft Citizen Participation Plan will be available for general comments for at least 30 days.
- The updated Citizen Participation Plan will be published as part of the final Consolidated Plan.

Stage 2: Needs Assessment

- Consolidated Plan - During the development of the Consolidated Plan, a community meeting will be held in at least two (2) low and moderate income neighborhoods to hear residents' opinions about the housing needs, strengths of the community and potential strategies. Community organizations will be invited to submit studies, survey results, and needs assessments to be used as data for the Consolidated Plan.
- Annual Action Plans - Each year at least two (2) community meetings will be held in different low and moderate income neighborhoods at least two (2) months before the draft Annual Action Plan is completed to assess how needs have changed and to evaluate program performance. Public elected officials from the local community will be invited to the community meetings.
- The City and the Consortium will encourage written suggestions from citizens. All written suggestions regarding the Consortium's Plans are to be sent to the Director of the North Shore HOME Consortium, and regarding the City of Peabody's Plans are to be sent to the Assistant Director of Community Development at Peabody City Hall, 24 Lowell Street, Peabody, MA 01960.

Stage 3: Draft of the Consolidated Plan and Annual Action Plan

Draft Document Availability:

- At least 31 days before a final Plan is approved, the City and the Consortium will notify citizens that a Draft of the Consolidated or Annual Action Plans are available. This notice will be e-mailed to all member communities and area non-profit agencies, published in area newspapers and on the web on the City of Peabody Website, and will give citizens a reasonable amount of time to review and comment on the Draft Plan.
- The Draft Plan will contain all sections required by HUD, including an estimate of how much funding the City and the Consortium expect to receive, priority tables, and an account of all proposed uses of expected funding (type of activity and amount of allocated funds).

- The Draft Plans and a summaries of the Draft Plans will be provided to the public within three (3) working days of request.
- Written suggestions will be encouraged from citizens. All written suggestions on the Consortium's Plans are to be sent to the Director of the North Shore HOME Consortium, and on the City of Peabody's Plans to the Assistant Director of Community Development, at Peabody City Hall, 24 Lowell Street, Peabody, MA 01960.
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- Public Hearings:
 - At least two (2) public hearings will take place, and an effort will be made to use the same neighborhoods where the first need assessment meetings were held, to obtain public reaction to the Draft Plan. These hearings will take place at least 15 days before the final Consolidated Plan or Action Plan is submitted to HUD. The timing of the hearings will be conducted to allow the public enough time to read the Draft Plan before the public hearing and to give government officials enough time to carefully consider public verbal and written comments and incorporate them into the final Plan.

Stage 4: Final Consolidated Plan and Action Plan

- Copies of the Final Plan and a summary of it will be available to citizens within three (3) working days of the request.

Stage 5: Amendments to the Consolidated Plan and Action Plan

- The City and the Consortium are required to submit an amendment to HUD if: 1) There is a change in any of the priorities listed in the Priority Table; 2) There is a transfer of funds to an activity not referenced in the Final Plan; or 3) There is a change in the purpose, location, scope, or beneficiaries of an activity.
- Changes in funding levels for existing or already proposed activities are not considered substantial changes unless the increase or decrease in funding is 10% or more than the original funding level and it exceeds \$30,000.
- Substantial amendments will be made public by publishing a public notice in area newspapers and on the City Website, will be e-mailed to member communities, and will undergo a 30-day comment period before the City/Consortium holds a public hearing. The hearing will be held no less than 10 days before the amendment is submitted to HUD. The City/Consortium will consider carefully all comments, written and verbal, and make available a copy of the substantial amendment along with a summary of the suggestions and comments not accepted and an explanation for their rejection.

Stage 6: The Consolidated Annual Performance and Evaluation Report (CAPER)

The CAPER must be submitted to HUD 90 days after the end of each program year. The CAPER must give a detailed description of how HOME funds were used in a given year and to what extent they benefited low and moderate income households.

- The City and the Consortium will give a 30 day comment period for the CAPER.
- The City and the Consortium will hold at least one public hearing regarding the CAPER. A complete copy will be made available to citizens free of charge within three (3) working days of the request.
- The City and the Consortium will include all written public comments to the CAPER in the final draft submitted to HUD as well as a summary of all verbal comments made at the public hearing.

E. Written Complaints and Concerns

- All written complaints, concerns and suggestions should be sent to either the Assistant Director of Community Development (for Peabody related issues), or to the Director of the North Shore HOME Consortium (for regional issues), the Department of Community Development, Peabody City Hall, 24 Lowell Street, Peabody, MA 01960. Written complaints will receive a written response within 15 working days.