

## **CR-05 - Goals and Outcomes**

### **Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)**

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

The goal of providing additional affordable housing for low income households was met and exceeded this program year. This year, the second of the five year cycle, was the first where no new funds were allocated to First Time Homebuyer Downpayment Assistance Programs. The decision to suspend FTHB programs was made two years ago as the result of data and public comment that was gathered in preparation for the Five Year Consolidated Plan, which made it clear that the greatest need in our region was for affordable housing for very low income households, at or below 60% of the area median income level. Our Five Year plan was written in such a way as to allow communities that had been administering FTHB programs to have one last year to wind down those programs and to shift focus to programs that benefit lower income households. This year only two FTHB activities were funded, since they were applicants who had begun the process the prior year but had not been able to finalize their loans before the end of the fiscal year. This shift away from assistance to FTHBs did not include a shift away from new homeownership creation. Several developers have come forward to propose new units of affordable ownership housing for households with incomes at or below 60% AMI, with some at or below 50% AMI, with . Also, because of the great need for immediate housing resources for extremely low income households, the Tenant Based Rental Assistance Program has expanded with two communities awarding their 2016 set aside of HOME funds to NSCAP, a non-profit agency, for their emergency TBRA program. The creation of rental housing proceeded as expected with 17 units underway, but fewer than expected homeowner rehabilitation activities were completed.

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

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

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Creation of Affordable Ownership Housing	Affordable Housing	HOME: \$	Homeowner Housing Added	Household Housing Unit	3	3	100.00%	3	3	100.00%
Economic Development	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted						
Economic Development	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	8000	7000	87.50%	7000	7000	100.00%
Economic Development	Non-Housing Community Development	CDBG: \$	Facade treatment/business building rehabilitation	Business	50	0	0.00%			
Economic Development	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	75	75	100.00%	25	25	100.00%
Economic Development	Non-Housing Community Development	CDBG: \$	Buildings Demolished	Buildings	0	1		1	1	100.00%

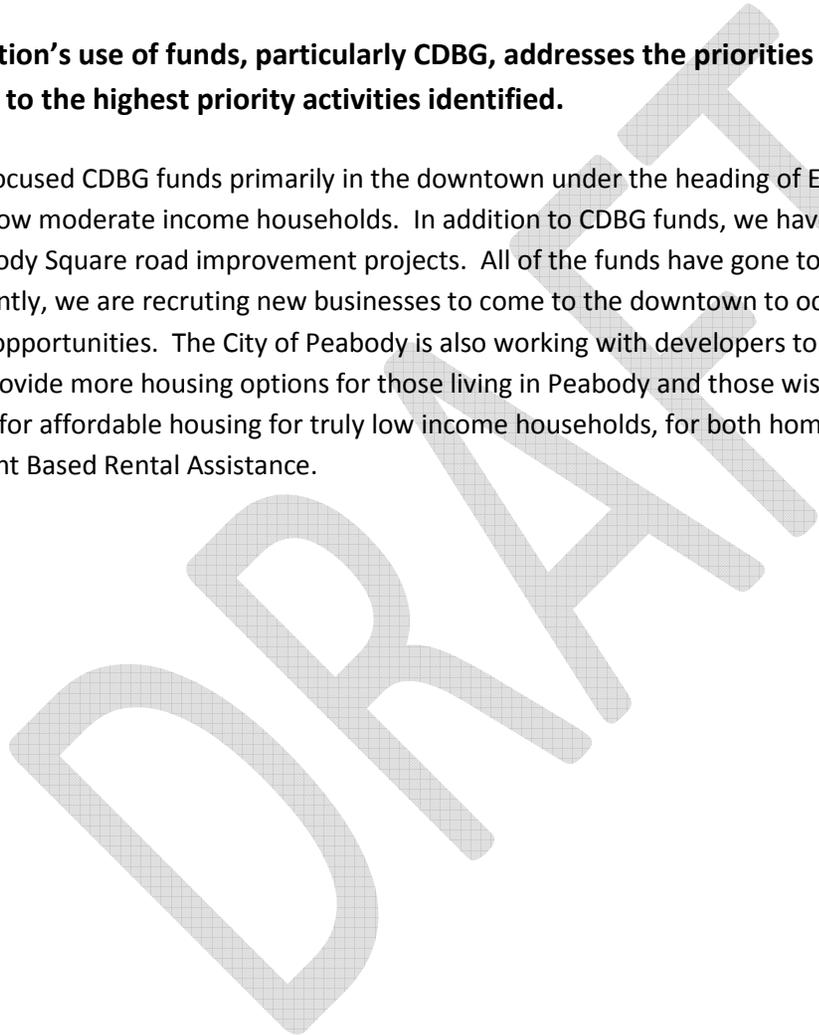
Homebuyer Downpayment Assistance	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Added	Household Housing Unit				0	0	
Homebuyer Downpayment Assistance	Affordable Housing	CDBG: \$ / HOME: \$	Direct Financial Assistance to Homebuyers	Households Assisted	0	2		0	2	
Homeowner Rehabilitation	Affordable Housing	HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	6	4	66.67%	6	4	66.67%
Infrastructure Improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	200	0	0.00%			
Public Facilities	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	200	0	0.00%			
Public Services	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	500	894	178.80%	490	894	182.45%

Public Services	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	0		0	0	
Public Services	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Homelessness Prevention	Persons Assisted	100	221	221.00%	110	221	200.91%
Rehabilitation of Ownership Housing	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	20	0	0.00%			
Rental Housing	Affordable Housing	CDBG: \$	Rental units constructed	Household Housing Unit	0	0				
Rental Housing	Affordable Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	0	0				
Rental Housing Production	Affordable Housing Homeless	CDBG: \$ / HOME: \$	Rental units constructed	Household Housing Unit	18	17	94.44%	18	17	94.44%
Rental Subsidies (TBRA)	Affordable Housing Homeless Non-Homeless Special Needs	CDBG: \$ / HOME: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	11	28	254.55%	11	28	254.55%

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

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

The City of Peabody has focused CDBG funds primarily in the downtown under the heading of Economic Development, where there is the highest concentration of low moderate income households. In addition to CDBG funds, we have received other grants that have funded the Main Street and the Peabody Square road improvement projects. All of the funds have gone towards improving safety and the beautification of the downtown. Concurrently, we are recruiting new businesses to come to the downtown to occupy vacant storefronts to improve the vitality; thus, providing more job opportunities. The City of Peabody is also working with developers to help build housing units in currently underutilized spaces to provide more housing options for those living in Peabody and those wish to come to Peabody HOME funds have been used to address the need for affordable housing for truly low income households, for both homeowner and through the creation of rental units and the provision of Tenant Based Rental Assistance.



**CR-10 - Racial and Ethnic composition of families assisted**

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

**91.520(a)**

	<b>CDBG</b>	<b>HOME</b>
White	2,848	58
Black or African American	275	12
Asian	26	0
American Indian or American Native	50	0
Native Hawaiian or Other Pacific Islander	8	0
<b>Total</b>	<b>3,207</b>	<b>70</b>
Hispanic	595	19
Not Hispanic	2,612	51

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

**Narrative**

The North Shore HOME Consortium and the City of Peabody require that all programs, projects, and housing units developed are open and available to households of all racial and ethnic backgrounds. The data above illustrates that racial and ethnic minorities are represented among those assisted.

## CR-15 - Resources and Investments 91.520(a)

### Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	CDBG	388,863	261,192
HOME	HOME	1,284,191	1,094,027
HOPWA	HOPWA		
ESG	ESG		
Other	Other		

Table 3 - Resources Made Available

### Narrative

The North Shore HOME Consortium is a direct recipient of Federal HOME funds for its 30 communities, and the City of Peabody receives a direct award of CDBG funds for the City. In addition, three other communities within the Consortium, Salem, Gloucester, and Haverhill, also receive CDBG funds directly from HUD for their communities, and some other member communities may be funded through the state CDBG application process. \$1,284,191 in HOME funds were allocated to the NSHC for PY 2016, and a projected \$100,000 was expected to be received in Program Income. \$1,094,027 was committed to activities and \$646,703 was drawn on PY2016 HOME activities. This includes an additional \$159,932 in HOME Program income received over the expected \$100,000 in Program Income. This past year the City of Peabody drew down \$261,192 prior to the end of the fiscal year. We received \$0 in CDBG program income in PY 2016.

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description

Table 4 – Identify the geographic distribution and location of investments

### Narrative

The NSHC does not invest funding by geographic location, and does not designate specific target areas for assistance. The City of Peabody does not specifically invest funds and strategies in a geographic area; however, most the funding is directed towards the downtown area, which has the highest concentration of low-moderate income households.

## Leveraging

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

The Cities of Peabody and Salem have CPA allocations which can be accessed to develop affordable housing development. Other resources are leveraged by developers to create affordable housing in the region, including:

1. Investments in LIHTC or Historic Tax Credit projects with private funding and/bond financing, to assist in the creation of new affordable housing units.
2. Private (lending institutions) mortgage funding leveraged to assist low income families with the purchase of their first home, especially in conjunction with HCV vouchers. The use of HCV vouchers for homeownership has not been a common practice used in the region, but where it has been used it has been successful. In addition, permanent mortgage financing is provided for affordable rental housing developments.
3. Community Preservation Funds [CPA]. Sixteen Consortium communities have established a Community Preservation Fund to preserve open space, historic resources and community housing, by imposing a surcharge of up to 3% on local property taxes.
4. Inclusionary Zoning and Linkage Fees. Several Consortium communities have linkage and/or inclusionary zoning requirements which provide either affordable housing units or funds for affordable housing.
5. Local funds from some cities and towns provide other resources such as CDBG and Housing Trust funds.
6. Municipality Donated Land. Some communities have designated or are contemplating the use of surplus, abandoned or undeveloped land for affordable housing.
7. Massachusetts Rental Voucher Program (MRVP). In recent rental development funding rounds. DHCD has made MRVP's available as project-based vouchers, primarily targeted to homeless individuals and families.
8. Project Based Vouchers. PHAs and the State can provide up to 20% of their HCV vouchers for specific projects.

To satisfy HOME match requirements the Consortium utilizes any allowable source, but relies mostly on the Massachusetts Rental Voucher Program match which was \$00000 for one community, the City of Peabody, to meet the HOME matching requirement through 6/30/2016.

There is no match requirement for CDBG funds; however, there are several major program types where leveraged funds play a significant role in program objectives. USDA Agriculture

Grant Brownfields Revolving Loan Fund, Community Development Authority Business Loan Program, Community Preservation, HOME Funds, DLTA grants, Massworks, MassDevelopment and Masshousing.

<b>Fiscal Year Summary – HOME Match</b>	
1. Excess match from prior Federal fiscal year	1,366,225
2. Match contributed during current Federal fiscal year	285,313
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	1,651,538
4. Match liability for current Federal fiscal year	321,048
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	1,330,490

**Table 5 – Fiscal Year Summary - HOME Match Report**

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Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
Peabody HA MRVP FY 2016	06/30/2017	1,651,538	0	0	0	0	0	1,651,538

Table 6 – Match Contribution for the Federal Fiscal Year

**HOME MBE/WBE report**

Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
0	259,932	175,021	0	84,911

Table 7 – Program Income

<b>Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period</b>						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
<b>Contracts</b>						
Dollar Amount	0	0	0	0	0	0
Number	0	0	0	0	0	0
<b>Sub-Contracts</b>						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
	Total	Women Business Enterprises	Male			
<b>Contracts</b>						
Dollar Amount	0	0	0			
Number	0	0	0			
<b>Sub-Contracts</b>						
Number	0	0	0			
Dollar Amount	0	0	0			

**Table 8 - Minority Business and Women Business Enterprises**

<b>Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted</b>						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

**Table 9 – Minority Owners of Rental Property**

<b>Relocation and Real Property Acquisition</b> – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired		0		0		
Businesses Displaced		0		0		
Nonprofit Organizations Displaced		0		0		
Households Temporarily Relocated, not Displaced		0		0		
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

**Table 10 – Relocation and Real Property Acquisition**

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## CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	23	28
Number of Non-Homeless households to be provided affordable housing units	40	26
Number of Special-Needs households to be provided affordable housing units	12	22
<b>Total</b>	<b>75</b>	<b>76</b>

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	11	28
Number of households supported through The Production of New Units	21	20
Number of households supported through Rehab of Existing Units	6	4
Number of households supported through Acquisition of Existing Units	0	2
<b>Total</b>	<b>38</b>	<b>54</b>

Table 12 – Number of Households Supported

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

Overall, the Consortium has accomplished the goals and objectives set forth in its One Year Action Plan for 2016. Deviations from the plan originally set forth were the result of the timing and logistics of projects, and the feasibility of the projects presented. Two ownership assistance activities that were delayed from the prior year were undertaken this year despite the fact that no new funding was allocated to that program. Also, a new focus on assisting the homeless and other extremely low income households by our communities created a large influx of funding toward Tenant based rental assistance,

for which there is an enormous need and therefore the numbers assisted far outnumber the predicted outcomes.

**Discuss how these outcomes will impact future annual action plans.**

Since this year’s outcomes were positive, the Consortium will make no major changes to the program as a result of its experiences, except as indicated in the ConPlan.

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	0	28
Low-income	0	17
Moderate-income	0	9
<b>Total</b>	<b>0</b>	<b>54</b>

**Table 13 – Number of Households Served**

**Narrative Information**

As mentioned above, the desire to create housing that is affordable to households with extremely low incomes is great, but the cost and complexity of those types of developments makes them slower to move forward and unfortunately none have come through this program year. Some are in the works and will move forward over the coming two years. The tenant based rental assistance [TBRA] program makes it possible to assist extremely low-income households to find immediate housing, and until an adequate supply of genuinely affordable rental housing has been created we will continue to rely upon TBRA to fill this gap. The NSHC continues to assist low- and moderate-income households wherever possible and to support developments that serve low income households of all levels.

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

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

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

The agencies that run individual emergency shelters in the NSHC region (Emmaus in Haverhill, Action in Gloucester, Lifebridge in Salem, and River House in Beverly) open their doors to homeless individuals with a various array of needs and disabilities. Their first step is assessing the needs of each individual who presents for assistance and then work to connect each person with the appropriate services and where possible, housing options. These shelters also conduct outreach to unsheltered homeless persons to inform them of the shelter options and of services that may be available. In addition, the family shelters in the region (NSCAP and Citizens for Adequate Housing in Peabody, Emmaus Family shelter in Haverhill, and HAWC Domestic Violence Shelter) are funded and receive referrals through the State, but when an unsheltered family calls or presents for services they each have systems in place to refer that family to the DTA for placement and to any other agencies or food banks, etc. that are needed.

In the City of Peabody, a specific Task Force on Homelessness has been formed to address the growing concern over those living outdoors in the community. The task force is made up of the Peabody Police street outreach person, the Director of the Public Health Department, the Director of the Peabody Housing Authority, staff from the Peabody Council on aging, the Peabody Public Library and Peabody Department of Community Development, staff from Haven from Hunger, North Shore Community Action Programs [NSCAP], Veterans Northeast Outreach Center, and other local non-profits, and representatives from several area churches. The task force has identified unsheltered homeless individuals and interviewed them to learn their needs and reasons for being homeless. With no shelter in Peabody and no options for subsidized housing for most (we were able to house one gentleman who was 60 years old in Peabody senior housing with the emergency homelessness priority) there is little that the group can do to get them indoors. All efforts are made to be sure to fit the available services with the applicable individuals, for one example one homeless man is a veteran who refused to accept any services from the VA, but after the task force identified that he was a veteran, and after repeated visits from the Director of the Northeast Veterans Outreach Center, the gentleman has decided that he would like to apply for some emergency veteran housing. Work continues to try to connect the homeless with the services and housing that they need.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

As the convener of the North Shore Continuum of Care Alliance, the North Shore HOME Consortium (NSHC) has assisted the emergency shelters and other homeless service agencies in its region to access \$000000 in McKinney-Vento funds in the past year alone. These funds are crucial to continue to shelter

and provide transitional housing, permanent housing, and other much needed services to the homeless in our region. The NSHC has also made homelessness a priority for funding through its competitive funding process. The creation of new rental housing through the collaboration of the Coalition for a Better Acre and the Veterans Northeast Outreach Center of Lowell and Haverhill (respectively), is nearing the completion of 24 rental units for which homeless veterans will be prioritized. In addition, \$103,000 in Tenant Based Rental Assistance has been committed to TBRA programs which assist households who are homeless or at risk of becoming homeless with a short-term rental subsidy.

In Peabody, the Task Force on Homelessness members work with the unsheltered homeless to determine what type of shelter or transitional housing options would be the best fit, but often the response is that they don't want to go into any shelter or "programs" and just need an inexpensive place to live. Many are lifelong Peabody residents who refuse to leave the community to seek shelter, and some have tried the Salem shelter and refuse to return. Another hurdle is that Salem Shelter is a "dry" facility, and for those who are actively using drugs and alcohol, that shelter is not an option.

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

As mentioned above, the City of Peabody's North Shore HOME Consortium is the convener of the North Shore Continuum of Care Alliance, which has assisted the emergency shelters and other homeless service agencies in its region to access \$000000 in McKinney-Vento funds in the past year alone. These funds are crucial to continue to shelter and provide transitional housing, permanent housing, and other much needed services to the homeless in our region. Because of an inquiry by the CoC's discharge planning committee, lines of communication were put in place between the homeless service providers and the publicly funded agencies that had been discharging people to homelessness. Due to the discussions that ensued, an understanding was reached and partnerships were formed to prevent such discharges. A representative from the Essex County Sheriff's Department, who administers the Middleton Jail, sits at the table each month to learn of the issues around homelessness, a representative from the North Shore Health Center is a continuum member as well as a member of the City of Peabody's unsheltered homelessness Task Force, and the Massachusetts Division of Children and Families that administers the State's Foster Care program has made a presentation to the CoC about the programs it has in place to prevent discharge from foster care to homelessness. Most valuable was that the lines of communication are now in place with these entities and they are now a partner in the process to help prevent this situation. THE NSHC also funds multiple Tenant-Based Rental Assistance Programs which help pay either a security deposit or a short-term rental subsidy for household who are homeless or in danger of homelessness. These programs, run through NSCAP, work with landlords to set up new residencies or to stabilize existing residencies, and offer a helping hand to keep people

housed.

The City of Peabody allocated CDBG funds directly to two non-profits, Catholic Charities and NSCAP, to provide homelessness prevention through rental & utility subsidies, landlord negotiations and counseling with primary goal of keeping families together and in their homes.

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

The focus of the HOME funds has been to assist in the creation of new units that had otherwise not been affordable to the homeless, or formerly homeless households. With more political support being directed to the Housing First type of housing and the goal of getting people into housing with the intention of providing supportive services subsequent to the housing issue, this model is being used in our region by two agencies, with the intention of shortening the period of time that people experience homeless. Since these programs are new, little data is currently available about how these transitions from homelessness into housing are working. Every agency makes a concerted effort to prevent households who were recently homeless from becoming homeless again.

As a national model, the success rate is seen to be significant. The Consortium will continue to confer with shelter providers and Community Assistance Programs (CAP agencies) to determine the effectiveness of these transitions.

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

### **Actions taken to address the needs of public housing**

The NSHC has extremely limited resources to assist the needs of PHAs and their clients. While it is disturbing to realize that some publicly-owned units are “off-line” (that is, not currently in use because of the need for repairs for which funds are unavailable) it continues to be the Consortium’s policy not to fund renovations to publicly-owned units. The Consortium continues to support the development of new units of affordable rental housing by local housing authorities to add to their current inventory. The City of Peabody works closely with the Director of the Peabody Housing Authority on the Peabody Homelessness Task Force, and the lines of communication are in place for when a question needs to be asked on either side, for placing a client or obtaining help with a resident.

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

Since public Housing Authorities are separate, independent entities, there is little that the NSHC can to impact policies there. The City of Gloucester helps to fund a first-time homebuyer counseling course and reaches out to local HA residents to encourage their participation. Many local banks administer FTHB training classes as well, and PHA residents are welcome to participate.

Also, since the need for affordable rental housing is great and there is a pressing need to house the homeless with little or no available affordable rental stock, the NSHC has implemented policy changes to shift funding from first time homebuyer down payment assistance, which assists households at about 80% AMI in most case and is never an option for an extremely low income household or a homeless household, to the creation instead of additional affordable rental housing. This year marked the final year of the NSHC’s HOME funded First Time Homebuyer Down payment assistance programs, and the approximately \$140,000 per year that was set aside for this activity will all be shifted to the creation of affordable rental housing.

### **Actions taken to provide assistance to troubled PHAs**

No troubled PHAs exist in the NSHC region.

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

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

Massachusetts law [Chapter 40B] requiring cities and towns 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 continues to have an impact. 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 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 goal of the Affordable Housing Law (Chapter 40B) is to make at least 10% of every Massachusetts' community's housing stock affordable for moderate income households. As of June 30, 2011, 39 communities had met that goal. Details are available on the Department of Housing and Community Development (DHCD) Subsidized Housing Inventory. In addition, 101 communities have developed Affordable Housing Production Plans that have been approved by DHCD. Six of those communities have been certified as meeting the benchmarks in their plans, which entitles them to "safe-harbor" protections from Chapter 40B proposals under 760 CMR 56.05(3)(b) and 56.03(4)(f).

The NSHC encourages local communities to pursue any strategy which enables the production of affordable housing. Throughout the year, at meetings of the North Shore HOME Consortium, discussions focus on "best practices" of member communities where affordable housing has been or is being created. 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.

In 2013 the City of Peabody created and DHCD subsequently approved a Housing Production Plan. Unfortunately, the City was not able to create the required number of units to have the plan

certified, which would have provided a safe harbor. There are currently two projects in the pipeline that we anticipate submitting applications to the City in the 2017 Program Year, the projects combined will create an additional 140 rental units. The City of Peabody adopted an Inclusionary Zoning Ordinance in 2003 that requires developers to provide 15% of all projects as affordable units. To date this ordinance has provided for the creation of 60 affordable units, which have been a mix of both rental and homeownership units.

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

The Consortium continues in its role as the convener of the Continuum of Care Alliance and helps to facilitate the implementation of the Alliance's plan to end homelessness. To accomplish this task, HOME resources has been used to help prevent homelessness through the targeting of TBRA resources to at-risk households with severe housing cost burdens and vulnerable special needs populations. The Consortium does not consider the development of additional emergency shelter beds as a priority. Instead, the Consortium has encouraged proposals that provide permanent supportive housing that targets homeless households as a high priority. At HUD's direction, serving those who are chronically homeless continues to be one of the Consortium's greatest priorities, despite the difficulty in assembling all of the resources needed to both keep those units affordable for those with extremely low incomes, and to provide the supportive services (funded by others) often needed to make these developments successful. The Consortium will continue to work with emergency shelters and transitional housing programs through the Continuum of Care Process to support those programs in their efforts to assist clients in the transition to permanent housing and independent living, including case management and stabilization services. Serving the needs of homeless veterans and their families, and determining the needs of homeless unaccompanied youth continue to be among the Consortium's top priorities.

The City of Peabody's CDBG funds have been distributed to non-profits that provide services for low-moderate income households, without these services there would be an even greater underserved need. The Peabody Council on Aging has increased their ability to provide outreach services for elders at risk and the Recreation division provides scholarships to students to enjoy outdoor activities and summer fun for households that could otherwise not afford to do so. Both Catholic Charities and NSCAP provide homelessness prevention services that include legal representation, landlord negotiations and tenant based rental assistance.

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

Despite the CAPER heading above appearing online in IDIS as "Actions taken to address obstacles to meeting underserved needs" we are proceeding with this section assuming that it was intended to be headed "Actions taken during the last year to evaluate and reduce lead-based paint hazards")

The key strategies for addressing the issue of Lead Based Paint during the program year were 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.

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

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 in so doing enables low moderate-income 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. [For example, providing letters of support.]

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, albeit it at a reduced level because of budget cuts. This short term rental assistance program had been targeted to families who were 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 greater environmental efficiency by the upgrading of utilities.
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 housing cost, it is the Consortium’s hope and belief these households are more able to allocate their scarce resources to other needs such as nutrition, education and other activities which can help assist them out

of poverty.

In addition to supporting the efforts of the creation of affordable housing, the City of Peabody is utilizing CDBG funds to improve the economic vitality of the downtown. The goal of this effort to ultimately improve employment opportunities with improved wages in the downtown that would be accessible to households living here.

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

The members of the North Shore HOME Consortium are currently in discussions with the lead community (the City of Peabody) concerning the efficiency of its current policy of allocating funds to each member community. For some of the communities with smaller allocations and smaller amounts, it is next to impossible to accomplish anything in the realm of housing development; for several of the larger communities with larger allocations, there is a different reaction. 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, or that a designated developer has that capacity.

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

The North Shore HOME Consortium works closely with public and private housing and social service agencies in both its' work on the development of new affordable housing using HOME funds, and in its work convening the North Shore Continuum of Care Alliance to bring new and renewal funds for programs serving the homeless. The NSHC provides funding to both private and public housing developers, including Public Housing Authorities, to create new, affordable housing for low income households, in many cases the housing developments created to serve the hardest to serve households include a component of services to support their residents. In almost all cases the housing developed through the Continuum of Care is connected with social services as a necessary part of the Care for their clients. Dozens of agencies actively participate in the Continuum of Care Alliance and in many cases step in to fill the service gap to allow housing dollars to flow to a project. A new Consortium of service providers has also been created, of which the City of Peabody and the North Shore HOME Consortium are a part, along with the Lynn Housing Authority and a regional group North Shore Housing Action Group, which has applied for and received emergency funding for homeless youth. In addition, as an offshoot of the Continuum of Care work was the formation of a Task force on Homelessness in Peabody, which convenes representatives from the Peabody Housing Authority, the Department of Public Health, representatives from local churches, and social service agencies to address the needs of the homeless who are living out of doors in Peabody.

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

While still firmly committed to affirmatively further fair housing activities, The North Shore HOME Consortium has been delayed in updating its current Analysis of Impediments to Fair Housing Choice (AI). The primary reason for the delay has been the wait for new regulations from HUD on this issue, which have now been released. Secondly, because of the budget cutback in the HOME program over the past three years (with an estimated reduction in overall funds at 60%) the level of funds available for administrative matters has subsequently been significantly reduced. There has not been a related reduction in the Consortium's number of communities, in the numbers of projects being brought forward, or in the activities related to convening the North Shore Continuum of Care Alliance. The reduced budget forces the Consortium to consider updating the AI with assistance from a Boston-based nonprofit organization, The Fair Housing Center of Greater Boston, who has been discussing such an update at no cost to the Consortium. The most recent AI – seen to be a useful and comprehensive document prepared in accordance with HUD's standards in effect at the time - was completed at a cost of approximately \$56,000. The Fair Housing Center of Greater Boston serves communities throughout the greater North Shore and the South Shore. The North Shore HOME Consortium will be revisiting the Analysis of Impediments to Fair Housing Choice to determine if impediments have changed since the prior analysis.

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## **CR-40 - Monitoring 91.220 and 91.230**

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

The 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, by working collaboratively with each of its sub-grantees, and by conducting reviews of files to determine compliance with regulations. The purpose of the monitoring process is to evaluate performance with regard to: Meeting production goals; Compliance with HOME program rules and administrative requirements (including minority business outreach and comprehensive planning requirements); Timely use of funds; Prevention of fraud and abuse of funds; Need for technical assistance; and 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 seven hundred activities developed within its region since its inception. Due to the large number of projects and recipients and small number of staff, the Consortium has contracted with a consultant to assist with the monitoring responsibilities. This approach has been used successfully for the past several years. The Consultant is an organization with over twenty years of experience in monitoring federally funded affordable housing activities 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. While an average of one or two projects had monitored each month, due to recent budget reductions and the reduced availability of administrative funds, that number of units has been reduced. Marked improvements in basic paperwork management by

subrecipients is one positive result of monitoring visit, for while most subrecipients monitored have a clear understanding of the requirements, some have now been instructed to better document their accomplishments and their findings as a result of local monitoring and to keep that paperwork in easily accessible files.

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

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

Each year, in accordance with its Citizen Participation Process, the North Shore HOME Consortium and the City of Peabody provide the public with reasonable notice and opportunity to comment on performance reports. Each year the draft CAPER is put out for public comment for 30 days prior to the final draft being submitted to HUD. Also, the City and the Consortium held a public hearing regarding the CAPER. In order to reach the largest audience possible, an advertisement was placed in the major newspaper serving the region (the Salem News, Newburyport News, Gloucester Times, Wilmington Town Crier, and the Lawrence Eagle Tribune), at least 14 days in advance of a public hearing. Advertisements were placed on the City of Peabody Website at least 14 days in advance of a public hearing. Advertisements were placed in El Mundo and the Banner, the ethnic and minority newspapers that serve the Consortium. The City and Consortium, who maintain and update an e-mail list of interested citizens and organizations, sent 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 were 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. A complete copy of the CAPER is made available to citizens free of charge within five (5) working days of any request. The City and the Consortium 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. This year no one attended the public hearing and no written comments were received.

**CR-45 - CDBG 91.520(c)**

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

The City of Peabody has not made any changes to the program objectives.

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

No

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

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## **CR-50 - HOME 91.520(d)**

### **Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations**

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

## Affordable rental Projects were on-site monitored during the 2016 Program year. No major issues were identified (see attached summary). Also, see attached list of activities, including dates of those that were monitored in PY 2016 showing dates of monitoring. The NSHC is working to update its records to show all monitoring that has occurred over the past several years, but due to limited staffing and lack of funds for additional staffing, this project has been slightly delayed. With the extremely large number of units that the NSHC has funded, and with the tiny staff and limited budget, it is not surprising that the NSHC has not monitored all of the units that may be due for an onsite monitoring visit. However, plans are still in the works to outsource even more monitoring to other part time staff and interns, but this becomes more difficult with budget reductions and a shortage of support staff.

### **Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)**

The Consortium has established policies and procedures to conduct an outreach program and affirmative marketing to minority and women businesses consistent with 24CFR§92.350 and§92.351 and Executive Orders 11625, 12138 and 12432. The Consortium encourages the use of minority business and women business enterprises in connection with its HOME assisted activities, and monitors its communities to ensure compliance with this requirement. The Minority Outreach Program has as a minimum standard that it will : (1) utilize the Massachusetts Supplier Diversity Office (SDO), formerly known as the State Office of Minority and Women Business Assistance (SOMWBA); (2) make use of local media to market and promote contract and business opportunities for minority business enterprises (MBEs), women business enterprises (WBEs) and Minority and Women-owned businesses (M/WBEs) that are certified by SDO; (3) develop and implement solicitation and procurement procedures that facilitate opportunities for MBEs, WBEs and M/WBEs to participate as vendors and suppliers of goods and services; (4) maintain records that provide data on the outreach to, and participation of MBEs, WBEs and M/WBEs as contractors and subcontractors in HOME assisted contracted activities; and (5) utilize MBE, WBE and M/WBE goals in subcontractor contracts. With respect to ensuring open and affirmative marketing of HOME assisted housing with five or more dwelling units pursuant to 24 CFR§92.351(b), the Consortium's policy is to:(1) inform the public, property owners, project sponsors and developers, potential owners and tenants regarding the existence of federal and state fair housing laws and the Consortium's policies; (2 )notify member communities, public and non-profit organizations that serve and/or represent minorities and women of the availability of HOME assisted housing and

programs; (3) utilize local and minority media to market and promote the availability of HOME funds on the widest scale possible; and (4) to offer and conduct presentations to local boards, tenant organizations, social service organizations, minority and women's organizations regarding the HOME program and its policies on affirmative fair housing and opportunities for MBE, WBE and M/WBE contracts.

**Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics**

During PY 2016, \$259,932 in HOME PI was received. Of that, \$25,993 was set aside as PA funds to support the work of the Consortium. The remaining funds were used to support 14 affordable housing projects throughout the Consortium region. These projects included , 5 Tenant based rental assistance projects overseen by the non- profit CAP agency NSCAP serving 28 households with incomes at or below 30% AMI, 7 housing rehab projects benefitting households with incomes at or below 60% AMI, 2 new ownership creation activity for two households with incomes at or below 60% AMI.

**Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)**

All of the actions undertaken by the North Shore HOME Consortium (NSHC) are targeted to foster and maintain affordable housing. The NSHC assists developers to create new safe and affordable rental units, assists very low income households with tenant based rental assistance subsidies; assists low income elders and disabled persons to maintain their housing by supporting housing rehabilitation programs. Because the recent Five-Year Consolidated Plan calls for an increase in the creation of affordable rental housing, there will be an increased focus on serving those households most in need. Budget reductions required a review of policies which support the use of HOME funds being distributed for down payment assistance to allow low to moderate income first time homebuyers to acquire ownership units. The current market conditions and the needs assessment does not support the creation of new ownership units. Recent discussions among the Consortium's member communities call for a transition from one type of program to another to minimize an abrupt change; this first year of this new five-year cycle has been a grace period to allow communities to adjust to that transition. Throughout this year these communities who previously only used HOME funds to assist First time homebuyers in their community are now looking at and implementing programs to encourage new affordable rentals and rental assistance programs to help their neediest residents stabilize and remain housed.