



Third Program Year Action Plan

Draft

The CPMP Third Annual Action Plan includes the SF 424 and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

Narrative Responses

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Executive Summary

The Executive Summary is required. Include the objectives and outcomes identified in the plan as well as an evaluation of past performance, a summary of the citizen participation and consultation process (including efforts to broaden public participation) (24 CFR 91.200 (b)), a summary of comments or views, and a summary of comments or views not accepted and the reasons therefore (24 CFR 91.105 (b)(5)).

Program Year 3 Action Plan Executive Summary:

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

Agencies and organizations in or serving populations within the City are invited to propose projects, through an RFP process. Applications are reviewed by staff to ensure that the projects are eligible and meet the goals and priorities outlined in the Consolidated Plan. All eligible projects are presented with funding recommendations to the Mayor, who provides final approval of the selected projects.

The priorities that Peabody has established for the one-year period 2012-2013 are:

1. Economic Development: Funds will be made available to improve economic opportunity for low and moderate income people. Priority will be give to those projects that create and/or retain jobs;
2. Affordable Rental Housing: Funds will be allocated to increase the supply of affordable rental housing (particularly for households earning 50% of AMI or less), to improve the quality of rental housing and to improve access to such housing;
3. Energy Efficient Housing: The City of Peabody will utilize CDBG and HOME funds to eliminate health and safety hazards, abate lead paint hazards, and provide improved accessibility to insure the health and safety of Peabody residents. The City will implement improved energy efficiency strategies to retrofit existing homes whenever possible.

4. Sustainable Growth: The City of Peabody will encourage planning and development of projects that will integrate transportation and housing needs and improves access to both.
5. Public Services: Funds will distributed to projects that support basic human service needs through funding of emergency services; address the service needs of special needs groups, including improving services for seniors, elderly and disabled individuals, so that they can participate fully in the community; and, provide a supportive services for low-income individuals and families with children.
6. Foreclosure/Homelessness Prevention: The City of Peabody will provide resources to organizations that assist residents at risk of foreclosure and/or homelessness.
7. Municipal Facilities: Funds will be made available to improve the quality and increase the quantity of neighborhood facilities serving LMI persons.
8. Administration: Funds will be utilized for administration of the program.

Table 1: Summary of Priorities 2012-2013

PRIORITIES	
GOAL A: ECONOMIC DEVELOPMENT	
Objectives:	Priority
1. Provide resources to projects that create and/or retain jobs	High
2. Provide services that improve economic opportunity for low and moderate income people	High
3. Increase the economic opportunities for persons with special needs	High
4. Encourage sustainable growth	High
GOAL B: RENTAL HOUSING	
Objectives:	Priority
1. Increase the supply of affordable rental housing (particularly for households earning 50% of AMI or less)	High
2. Maintain the current inventory of affordable rental units	High
3. Improve the quality and energy efficiency of affordable rental housing	High
GOAL C: OWNER HOUSING	

PRIORITIES	
Objectives:	Priority
1. Improve the quality and energy efficiency of owner housing	High
2. Improve access to affordable owner housing	High
GOAL D: INFRASTRUCTURE	
Objectives:	Priority
1. Improve quality/increase quantity of public improvements that benefit LMI persons	High
GOAL E: FACILITIES	
Objectives:	Priority
1. Improve quality/increase quantity of neighborhood facilities serving LMI persons	High
2. Improve quality/increase quantity of facilities that benefit the elderly	High
GOAL F: PUBLIC SERVICES	
Objectives:	Priority
1. Improve services for the elderly	High
2. Improve services for disabled adults	High
3. Improve services for women and children fleeing domestic violence	High
4. Improve services to low and moderate income households.	High
5. Increase range of housing options and related services for persons with special needs	High
6. Provided supportive services to help prevent homelessness	High
7. Provide housing and supportive services for persons with HIV/AIDS and their families	High
8. Provide resources to assist residents at risk of foreclosure	High

Executive Summary Response: Evaluation of Past Performance

An estimated total of 1,312 people have been assisted with the CDBG program funding this past 4 years. The major accomplishments in the targeted priority areas are as follows:

Decent Housing:	160
Suitable Living Environment:	1,124
Expanded Economic Opportunities:	28

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

Groups active in areas which use or could use resources outlined in the Consolidated Plan, were notified of the development of the plan and were invited to submit suggestions, ideas and requests for support.

In addition, many responded to a survey mailed to various organizations active in housing and services. The survey was followed by a series of public meetings and hearings which were conducted for public input, after official notices were advertised in local community newspapers.

The draft Annual Action Plan was made available on April 13th, 2012.

The City has always involved local organizations which have specific ties to, or whose members comprise minority, non-English speaking or disabled persons.

Any input received from organizations and citizens was considered and incorporated into this plan, if appropriate.

Executive Summary Response: A Summary of Comments or Views and a Summary of Comments or Views not Accepted and the Reasons therefore (24 CFR 91.105 (B)(5)).

No formal comments were received.

General Questions

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

Program Year 3 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 City strives for proportional distribution of CDBG funds across the community. The City is not required to but does allocate CDBG funds to eligible areas. The poverty areas which have been defined by HUD are as follows:

Table 2: Poverty and Racial Concentrations¹ (2000 Census, 2008 ACS, 2009 ESRI)

% Poverty Families Census 2000	% Poverty Families Census 2008	% Minority 2009 Estimate	% Minority (Self-Declaration) 2009 Estimate
2.5%	N/A	9.77%	12.90%

¹ US Census 2000 SF3, American Community Survey 2008, ESRI forecasts for 2009 and 2014

Note: N/A means that no data is made available by the US Census ACS 2006-2008 for these communities and thus none is made available by HUD in the 2009 CHAS.

As can be seen from the Table above, the minority population in Peabody in 2009 was in excess of 10%. Within the City, there are census tracts and census blocks which have different concentrations of poverty and minorities. These are discussed below.

Significant concentrations of low and moderate income persons and/or racial concentrations, provide pertinent information when decisions are made of where CDBG 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. It also defines how some CDBG uses may be approved under what is termed an 'area benefit'. Under this designation, it is presumed that activities funded with CDBG would primarily benefit low income persons, if they are implemented in a defined area with a low-moderate income population of 51% or greater.

Table 3: HUD Defined Low Mod Percentages by Census Tract and Block²

Tract	Block Group	Low Mod #	Universe	Low Mod %
210800	3	1276	1875	68.1
210700	4	549	816	67.3
210800	2	534	813	65.7
210800	1	724	1388	52.2
210700	3	669	1283	52.1
210600	1	767	1553	49.4
210900	1	584	1256	46.5
210600	3	558	1208	46.2
210300	1	514	1132	45.4
210900	3	784	1761	44.5
210400	1	1154	2725	42.3
210700	1	427	1154	37
210400	2	887	2431	36.5
210300	2	841	2324	36.2
210100	1	891	2611	34.1
210900	4	332	978	33.9
210400	3	210	675	31.1
210500	2	135	446	30.3
210200	1	386	1299	29.7

² HUD Low-Mod Census Tracts

Tract	Block Group	Low Mod #	Universe	Low Mod %
210700	2	221	748	29.5
210600	2	198	680	29.1
210500	1	319	1131	28.2
210500	4	918	3447	26.6
210300	3	588	2216	26.5
210500	3	352	1326	26.5
210600	4	153	591	25.9
210200	2	494	1991	24.8
210200	3	564	2292	24.6
210100	3	282	1570	18
210100	4	248	1429	17.4
210100	2	232	1565	14.8
210400	4	92	693	13.3

Note: The highlighted Blocks are eligible for area benefit designation of CDBG funds.

A new factor affecting the City for the last 3 years and likely to continue for next year, is the foreclosure crisis. HUD and the State have identified communities with significant foreclosure problems and within those communities, the neighborhoods hardest hit. Peabody was identified as such an area. In September 2008, HUD listed the following delinquency and foreclosure information for Peabody.

Table 4: HUD Analysis of Delinquencies, Foreclosures and Mortgages³

Census Tract	2006-2008 number of delinquent mortgages and foreclosures	% of mortgages made 2004-2007 which were low cost but highly leveraged	% of mortgages made 2004-2007 which were high cost but with low leverage	% of mortgages made 2004-2007 which were high cost and highly leveraged
210100	147	28.9%	7.5%	8.4%
210200	91	29.1%	3.4%	7.9%
210300	65	27.4%	3.8%	7.7%
210400	66	33.7%	3.4%	7.8%
210500	114	30.6%	2.7%	9.6%
210600	56	31.0%	4.9%	9.6%
210700	67	32.9%	6.3%	13.3%
210800	45	36.3%	4.6%	10.4%
210900	49	33.7%	3.4%	11.6%
Total	700			

³ HUD NSP Analysis

As of April 1st, 2012, there were 39 *lis pendens*, 47 in auction and 56 in REO status.⁴ This foreclosure crisis and the hardest hit areas will be considered in the allocation of CDBG resources.

The next table lists Peabody's census tracts in terms of racial concentration.

Table 5: Peabody Minority Concentration by Census Tract⁵

Peabody Census Tract	% Minority 2009 Estimate
210700	44.30%
210800	41.20%
210600	14.10%
210400	11.50%
210900	10.10%
210300	7.70%
210500	7.50%
210200	6.90%
210100	6.40%

Five census tracts in Peabody have a minority concentration of more than 10%. In two census tracts, over 40% of the population is minority.

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.

The CDBG program identifies low-mod and target areas within the City. The City considers the area benefit, deconcentration objectives and the foreclosure crisis as factors in choosing which programs to fund.

Based on historical data from the last 4 years, we expect that approximately 10% of beneficiaries in the next 4 years, will be poverty households. As noted already, the City uses its programs and gives consideration to projects which are in high poverty or minority concentration areas, or which target very and extremely low income households or individuals with disabilities, in order to better meet underserved needs.

⁴ RealtyTrac 04/13/12

⁵ ESRI

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 continues to be the availability of funds. Except for special populations unable to work (some elderly, most extra elderly, some disabled and those institutionalized), the critical need is jobs. When working with agencies to develop this plan, many agencies noted that a shift in clients had occurred. Previously many of the clients had no employment or sporadic employment histories. Now formerly regularly employed persons were seeking help.

Organizations serving these populations continue to experience significant reductions in funding from both governmental and private sources. Reductions in state aid to local budgets have increased the funding shortfall, leaving many worthy and valuable programs unfunded or underfunded.

While this may be beyond the capacity of the local jurisdiction to address satisfactorily, the City is committed to continuing to work with and support public non-profit agencies such as the PHA, human service departments, 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 City will continue to communicate with these groups as their needs change or the demand dramatically increases over the next year. Wherever possible, the City will provide technical assistance and support to providers in their pursuit of federal, state and other funding sources.

Moreover, the City actively educates Peabody organizations and citizens, 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.

Peabody anticipates the following sources of funds for the year 2012-2013:

Federal Funds

CDBG Grant & Program Income	\$ 354,935
HOME (Estimate)	\$ 88,940
HCV	\$ 5,433,583
McKinney-Vento (Estimate)	\$ 173,758

State Funds

DHCD, Public Housing and MRVP	\$ 4,481,982
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Local Funds

CPA	\$ 250,000
Community Development Authority	\$ 200,000

Managing the Process

- 1. Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.*
- 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.*
- 3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.*

Program Year 3 Action Plan Managing the Process response:

- 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 Peabody Consolidated Plan as well as its administration and reporting to HUD, is the Department of Community Development carrying out day-to-day management. The office will oversee administration of the CDBG Program and implementation of the Consolidated Plan. The City of

Peabody uses 20% of the CDBG allocation for planning and administrative costs.

The CDBG program receives overall direction from the City's Community Development Director and is managed on a day-to-day basis by the Assistant Director of Community Development.

The Assistant Director is responsible for all Downtown revitalization and economic development activities; ensuring that all program activities are carried out in a timely manner consistent with grant conditions, DHCD and Federal regulations; acting as contact point between the CDBG program and other City departments, Federal and State agencies and the general public; seeking out and applying for other funding sources to help leverage CDBG funds; monitoring all activities for timely implementation; compiling and submitting grant reports; supervising personnel; initiating and obtaining approvals for program and budget amendments; processing payment requests; and insuring that appropriate program and financial records are maintained. This person is also responsible for the overall administration of the Housing Rehabilitation Program; assisting homeowners with their applications for loans and grants; evaluating bids; monitoring rehabilitation contracts; insuring compliance with national objective; adequately maintaining all housing files. Additionally, the position is responsible for the grant application and public hearing process and financial management.

The Housing Rehabilitation Inspector is responsible for work write-ups, job inspections and code enforcement reports; serves as the Fair Housing officer and Relocation Specialist.

The City Planners assist in the administration of the CDBG grant by conducting redevelopment plans and other studies; grant application writing and assisting with public hearings, workshops and focus group meetings.

The major public agencies contributing to the administration of the programs covered by the Plan include other City departments as applicable, local CAP agencies and various private non-profit organizations involved in housing development, services for the homeless, elderly, disabled, substance abuse and victims of domestic violence.

The key agencies responsible for the priority objectives of the CDBG program for the program year 2012-2013 are:

Table 6: CDBG Program Segments

Funding Priority	Agency/Partner		
<i>Decent Housing:</i>			
Housing Rehabilitation	Department of Community Development		
Homeless Prevention	Catholic Charities	NSCAP	Peabody Public Schools
Emergency Housing Assistance	HAWC	Strongest Link	
<i>Suitable Living Environment:</i>			
Educational and Vocational Enhancement	Peabody Public Schools		
Supportive Services	Peabody Council on Aging	Peabody Youth Summer Camp	
<i>Creating Economic Opportunity:</i>			
Arts Community Support	Northeast Arc		
Work Transition Support	Northeast Arc	North Shore Education Consortium	
Façade Improvements	Department of Community Development	Community Development Authority	

In addition, we are listing the other organizations, which have historically been are involved with and support the CDBG program.

Table 7: Other Organizations Involved with the CDBG Program

City of Peabody:	
Health Department	Council on Aging
Inspector's Office	Parks, Recreation and Forestry Department
Police Department	Veterans Services Department
Fire Department	Water Department
Public Services	Municipal Light Plant
Office of Information Technology (OIT)	Main Branch Library

Other Public Organizations:	
Peabody Housing Authority	North Shore HOME Consortium
Gloucester/Haverhill/Salem/Essex County CoC	

Private Organizations and Agencies:	
Bass River Inc.	Community Teamwork, Inc. (CTI)
Cerebral Palsy Association of Eastern Massachusetts	Danversbank
Citizens for Adequate Housing (CAH)	Help for Abused Women and their Children (HAWC)
Haven from Hunger	Independent Living Center of the North Shore
Catholic Charities	North Shore Community Action Program (NSCAP)
T. D. Bank	Turning Point Inc.
Transitions Inc.	Strongest Link

The major homeless needs in the area are primarily delivered through the **Gloucester/Haverhill/Salem/Essex County CoC** using McKinney-Vento funding. The lead agency for the CoC is the City of

Peabody. The key agencies responsible for the McKinney-Vento program are:

Table 8: Delivery Organizations for McKinney-Vento

Organizations Delivering Programs Funded by McKinney-Vento
North Shore Community Action Program
Turning Point, Inc
The Salem Mission Inc.
Lynn Shelter Association
Life Bridge
Haverhill Housing Authority
Emmaus Inc.
Veterans Northeast Outreach Center
Action Inc.

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 City authorizes the planning and management process and delegates its implementation to the Department of Community Development and Planning. The City's approach for research and analysis of needs was to hire a consultant to assist in the assembly and analysis of data from databases, from agencies in the area, from surveys and from meetings. As described more fully in the Citizen Participation section, the City also built upon the extensive process used to create prior Plans which drive much of what the City does in housing and economic development.

For example, a Master Plan was created in 2002; a Housing Needs Assessment and Strategy Plan was created in 2003, this plan is in the process of being updated and should be completed by the end of June 2012; the Impediments to Fair Housing Plan revised in 2008; and the Consolidated Plan in 2010 and the Annual Action Plans of the last 2 years.

Groups active in areas which use or could use resources were made aware of the Plan being developed, by advertisements, public notices and direct emails and were invited to submit suggestions, ideas and requests for support. In addition many of these same groups responded to a survey mailed to all potential groups and attended a series of public hearings, which were conducted for public input.

Project applications are evaluated by staff and then make recommendations to the Mayor for approval.

In addition to the planning for each Annual Action Plan, the Department of Community Development communicates community needs, goals and objectives. It is very important that the cities and towns, the local housing authorities, health and social service agencies share a common vision for the betterment of the region's low and moderate-income population. The staff makes presentations to departments and agencies in order to enhance collaboration and involvement from the region's housing, health and social service providers. In addition, during the year the Department of Community Development interacts regularly with contractors and providers.

This process will continue during the next year.

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 City 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 Peabody's low income population. The Assistant Director will meet with subgrantees during the year to assess the existing program and discuss changes needed as well as ideas for new directions and also 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.*
- 2. Provide a summary of citizen comments or views on the 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.*
- 4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.*

*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.

Program Year 3 Action Plan Citizen Participation response:

1. Provide a summary of the citizen participation process.

The City has adopted a Citizen Participation Plan which establishes the process by which the 5 Year Consolidated Plan and Annual Action Plans are designed and developed in consultation with the general public. The City of Peabody also encourages citizens of the city to participate in the development of any substantial amendments to the Consolidated Plan and required Consolidated Annual Performance and Evaluation Report (CAPER).

A concerted effort is made to increase the participation of low and moderate-income persons. Particular efforts are made to encourage participation by residents of predominantly low and moderate income neighborhoods, which currently include the following census tracts: 2107 and 2108.

The planning and citizen participation activities for these plans generally begin in December or January 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.

The meetings, widely advertised throughout the City, include three significant components:

- a brief explanation of the Consolidated Plan process, including the role of the Plan in making allocations and guiding the selection of projects to be funded.
- a report on prior year activities and progress on 5 year goals.
- a forum for the general public to brainstorm and discuss priority needs for the City for the coming years.

Public hearing minutes are available upon request and comments received (if any) are summarized in Attachment C. 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 CBDO.

Once proposals have been submitted, reviewed and tentatively selected, this information is blended with the public-driven needs assessments for the City and a draft Annual Action Plan is developed. These draft plans are made available (usually on or around April 1st), in the Peabody Department of Community Development office and on its website for public review and comment for a period of thirty days. Any comments received are addressed and where appropriate, included in the final plans which are then submitted to HUD for approval in May of each year.

The City's approach to citizen participation this year, where HUD requires an Annual Action Plan for 2012-2013, 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. Many different organizations and agencies were sent a survey also, seeking input on their perception or 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.

A series of regional public meetings were conducted. The two advertised city-wide public meetings for public input were conducted at the Haverhill City Hall, Room 301, 4 Summer Street, Haverhill, Massachusetts on March 22nd, 2012 and at the Peabody City Hall on March 22nd, 2012. The City of Peabody is the lead community for the North Shore HOME Consortium; therefore, both public meetings were conducted in collaboration with the Consortium as part of the community citizen participation process.

At these meetings the discussion was framed around the following questions:

- Changes in the clientele requesting services. "What changes (if any), have you seen in the past year or two in the persons trying to access your services?"
- Changes in your priorities. "Have you changed your priorities recently or plan on changing your priorities in the coming year, in terms of who you serve?"
- Changes in your approach. "Have you seen any need to change your strategies or methods of doing business?"
- Observations on other issues in the Consortium. "Do you see anything which the Consortium should address in the next few years, which while outside your organizational program, you believe is of high importance?"

In addition attendees were invited to submit data and comments by email after the meetings.

The draft Plan was made available on April 13, 2012 at the offices of the City of Peabody Department of Community Development located at 24 Lowell Street Peabody. The draft Plan was also available online at www.peabody-ma.gov and by request during the 30 day public comment period. Two additional regional public meetings were conducted. The two advertised city-wide public meetings for public input were conducted at the Haverhill City Hall, Room 301, 4 Summer Street, Haverhill, Massachusetts on April 24th, 2012; and on April 26th, 2012 at the Peabody City Hall Lower Level Conference Room, 24 Lowell Street, Peabody, Massachusetts 01960.

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

During the public hearings and planning process prior to the draft being issued, the City received comments, which were incorporated into the draft Plan.

TBA

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.

In a continuing effort to broaden public participation, especially to minorities, non -English speaking persons and persons with disabilities, the Department of Community Development has worked with and will continue to work closely with the Human Services Departments, Housing Authorities and social service agencies, housing and economic agencies in the City. These agencies serve as communication conduit 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 City 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. most jurisdiction-based public service agencies.

2. housing authorities.
3. faith-based organizations.
4. municipal websites.
5. 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.

After the draft was issued and advertised, no comments either oral or written were received.

Institutional Structure

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

Program Year 3 Action Plan Institutional Structure response:

Statutorily, we can only allocate \$51,000. In addition, there is a major increase in the demand to stabilize and enhance the job sector and the housing sector. The focus of the City this coming year will be to try and enable existing organizations to survive and to assist them in accessing additional resources.

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.

Program Year 3 Action Plan Monitoring response:

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 CDBG

funded projects for compliance with any required inspections schedule, with any recapture and resale provisions, beneficiary eligibility, as well as recertification monitoring for income and rent compliance.

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

The following describes the standards and procedures the City of Peabody uses to monitor housing and community development projects to ensure long-term compliance with program requirements and comprehensive planning requirements.

Overview:

Monitoring consists of start up assistance to review the agreement requirements, policies and procedures; reviewing payment documentation requirements; ongoing monitoring during the contract period, which includes periodic reporting and providing technical assistance; annual visits to public service providers and annual surveys to owners of assisted rental units; long term monitoring of rental agreement compliance; and internal monitoring of the City of Peabody staff procedures.

Start-Up Assistance:

Prior to the start-up of a sub-contracted activity, the Assistant Director of Community Development reviews both program and record keeping requirements with the person, agency or business receiving Federal funding. A written Agreement that outlines the scope of the activities, performance criteria and length of funding period is created. The contract is reviewed with the recipient and signed.

Payment Processing:

Payment requests must be submitted with supporting documentation that may include time sheets, certified payroll records, affordable housing restrictions, income documentation, corresponding bills and/or cash receipts. Reimbursement requests are not processed without the required documentation.

Ongoing Monitoring:

A staff member of the City of Peabody's Department of Community Development conducts at least one on-site monitoring visit for each new sub-recipient during the program year; renewal projects may be monitored every other year. New sub-recipients may be visited a second time in order to assist with questions and check on program progress. A monitoring schedule is prepared and the sub-recipient visits are prioritized, by determining if any organizations are considered high risk, i.e., new to the CDBG program—first year as a sub-recipient; high staff turnover—especially in key positions; previous compliance or performance problems; or carrying out high-risk activities, such as economic development and/or multiple CDBG activities for the first time.

Annual Monitoring:

Housing Rehabilitation:

Proper documentation of income must be submitted prior to the execution of any loan documents or expenditure of funds. Following periodic and final inspections where the work has been completed to the satisfaction of the Housing Inspector, funds are disbursed. All owners that utilize Housing Rehabilitation to upgrade rental units are required to maintain the rental units as affordable for the length of the loan.

In order to ensure compliance with stipulations of the rental agreements entered into by landlords participating in the Peabody Housing Rehabilitation Program, the following procedures are followed:

1. A copy of 24 CFR § 511.13 *Nondiscrimination, equal opportunity and affirmative marketing requirements* is sent directly to each tenant, with information on who to contact if any violations occur or questions arise.
2. During the period of the loan, an annual review of rental agreements is undertaken and landlords are contacted by phone and/or letter to determine if any changes have occurred in tenant status. Results of interviews are posted to the file.
3. At the same time landlords are contacted, tenants are mailed a brief questionnaire to verify information obtained. Completed questionnaires are filed.

4. In cases where tenants have moved, new tenants are required to complete tenant application and verify income.
5. Monitoring compliance with rental agreements is the responsibility of the Housing Rehabilitation Inspector.

Any violations by a landlord of the stipulations put forth in the rental agreements will be addressed as follows:

- Landlord will be notified of violation and be given forty-five (45) days to remedy situation, with the stipulation that if correction of violation is made, all funds made available to the homeowner through the Housing Rehabilitation Program, will become payable in full. The amount of time the violation exists will be added to the two year time agreement.
- Any problems with enforcing agreements will be turned over to the City Solicitor.

Public Services:

A staff member of the City of Peabody's Department of Community Development conducts at least one on-site monitoring visit for each new sub-recipient during the program year; renewal projects may be visited every other year. During the actual visit, a thorough review of the sub-recipient's files is done to ensure it complies with all regulations governing its administrative, financial and programmatic operations and that it is achieving its performance objectives within schedule and budget. A clear written record of the on-site visit is completed by the staff member and maintained in the file. At the end of the visit, the monitor concludes the visit by reviewing the tentative conclusions from the monitoring. At this point, there should be a clear understanding between the monitor and sub-recipient of the areas of disagreement and agreement regarding the monitoring results.

Following the on-site visit, the staff member prepares a formal written letter which outlines the results of the visit, particularly any issues that may have been found and recommendations and/or requirement to remedy the matter. The issues must be corrected by the date specified in the letter and a follow up visit is scheduled. A copy of this letter is kept on file.

Davis Bacon Compliance

In addition, Community Development staff oversees federally funded projects, which require Davis Bacon compliance. The City's 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

City 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 is to ensure that employment and other economic opportunities created by HUD assistance to construction and rehabilitation projects is directed to low-income persons. All public housing residents qualify as Section 3 residents, as do all low-income individuals (those with annual incomes of less than 80 percent of area median income) living in a metropolitan area or non-metropolitan county that contains a covered project.

Section 3 applies to all Community Development Block Grant public and residential construction projects valued at over \$200,000. The City of Peabody must ensure that, to the greatest extent feasible, at least 30% of new, full-time hires are Section 3 residents. This obligation does not apply if a project results in no new employees being hired. In the event that a project is subject to the Section 3 requirement, the City will ensure that the project(s) will comply. Additionally, the City annually certifies to HUD that it is in compliance with Section 3.

If the City issues a contract in excess of \$200,000 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 Procedures:

The City of Peabody is subject to the Fair Housing Compliance procedures detailed in the North Shore HOME Consortium's

Consolidated Plan and the Analysis to Impediments to Fair Housing (AI). The North Shore Housing Consortium, with the City of Peabody in the lead, created the AI. The study is required by the U.S. Department of Housing and Urban Development as part of the Consortium's obligation to "affirmatively further fair housing." The AI was last updated in 2008 and explores and identifies conditions in the region that have the effect of restricting housing choice for persons protected by state and federal fair housing laws.

In addition to the requirements set forth by the North Shore HOME Consortium, the City of Peabody's Fair Housing Officer educates local residents to empower them to fight against discrimination and provides outreach to area lenders, property owners and elected officials concerning Fair Housing Law. Quarterly reports are submitted to the Massachusetts Commission Against Discrimination, which outlines the funding sources utilized and the number of units assisted for housing rehabilitation, down payment assistance, lead paint hazard removal and home modifications.

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.*

Program Year 3 Action Plan Lead-based Paint response:

- 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 of lead poisoning during the next year are as follows:

1. 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 programs which are available to low and moderate income homeowners and investors who need financial assistance with lead based paint abatement.
3. Encourage code enforcement, which can lead to homes being de-lead.
4. All applicants for financial assistance for housing rehabilitation are required to have a lead test conducted on the property. Should any lead based paint hazards be found, the work write-up will include all steps required to remove any lead based paint hazards.

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 during the next year.
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.

Program Year 3 Action Plan Specific Objectives response:

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

The priorities and specific housing objectives for the Annual Plan (2012) are as tabulated below.

Table 9: Priorities and Specific Objectives 2012-2013

PRIORITY OBJECTIVES	Target Population	Estimated Beneficiaries 2012-2013
GOAL A: ECONOMIC DEVELOPMENT	See Community Development Section	
GOAL B: RENTAL HOUSING		
Priority Objectives:		
1. Increase the supply of affordable rental housing (particularly for households earning 50% of AMI or less)	VLI All Types of Rental HHs	2
2. Maintain the current inventory of affordable rental units	ELI-VLI-LI All Types of Rental HHs	2
3. Improve the quality and energy efficiency of affordable rental housing	ELI-VLI-LI All Types of Rental HHs	2
GOAL C: OWNER HOUSING		
Priority Objectives:		

PRIORITY OBJECTIVES	Target Population	Estimated Beneficiaries 2012-2013
1. Improve the quality and energy efficiency of owner housing	ELI-VLI-LI All Types of Owner HHs	11
2. Improve access to affordable owner housing	ELI-VLI-LI All Types of Owner HHs	11
GOAL D: INFRASTRUCTURE	See Community Development Section	
GOAL E: FACILITIES	See Community Development Section	
GOAL F: PUBLIC SERVICES	Also See Community Development Section	
Priority Objectives:		
1. Improve services for the elderly	All LI Elderly HHs	78
2. Improve services for disabled adults	All LI Disabled HHs	10
3. Improve services for women and children fleeing domestic violence	All LI Families	100
4. Improve services to low and moderate income households.	All LI Families	100
5. Increase range of housing options and related services for persons with special needs	All ELI-VLI-LI Special Needs HHs	80
6. Provided supportive services to help prevent homelessness	All HHs facing homelessness	300
7. Provide housing and supportive services for persons with HIV/AIDS and their families	All HHs with HIV/AIDS	11
8. Provide resources to assist residents at risk of foreclosure	All LI HHs	200

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.

For the period July 1, 2012 through June 30, 2013, the City of Peabody will have the following funds available to enable the various programs and activities to meet their goals and objectives.

Federal Funds

CDBG Grant & Program Income	\$ 419,664
HOME (Est)	\$ 145,464
HCV	\$5,433,583
McKinney-Vento (Est)	\$ 173,758

State Funds

DHCD, Public Housing and MRVP	\$4,481,982
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Local Funds

Community Development Authority	\$ 150,000
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The City occasionally has opportunities to use CDBG funds as leverage for other sources of funds. The program income is based on the repayment of loans. These funds are then reallocated back to the various programs.

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.*
- 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.*

Program Year 3 Action Plan Public Housing Strategy response:

- 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 City has extremely limited resources to assist the needs of the PHA and its clients, especially when compared with the needs of those who do not have access to affordable housing.

It continues to support the PHA's residents and participants who apply for homeownership assistance, focusing on those coming out of Family Self Sufficiency programs.

The City will also work with the State and the PHA 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 66 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.

The PHA has not been designated as troubled by HUD and there are no indications that it has been performing poorly.

Barriers to Affordable Housing

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

Program Year 3 Action Plan Barriers to Affordable Housing response:

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.

The City of Peabody has created several affordable units through the Inclusionary Zoning Ordinance (IZ), which requires that developers set

aside 15% of the total development as affordable units for every development that exceeds 8 units. Any units created by the IZ must be approved by the Massachusetts Department of Housing and Community Development (DHCD) through the Local Initiative Program (LIP) as Local Action Units. Moreover, Peabody adopted a Housing Production Plan [HPP] which provides incentives for the development of affordable housing.

While the City has been able to maintain an affordable housing stock close to 10% throughout the past decade, it must continue its efforts as the number of low and extremely low income households is not expected to decline over the next five years. The current economy has resulted in a decline in the production of new housing units. In response to this decline in production the City of Peabody will seek projects to fund that utilize the increasingly vacant housing that has been abandoned as a direct result of the current foreclosure crisis to provide permanent homeownership and/or rental units. Housing Rehabilitation Program funds will be used to rehabilitate both homeownership and rental units; thus, creating more affordable units. Additionally, rental assistance programs have been funded through the North Shore HOME Consortium.

HOME/ American Dream Down payment Initiative (ADDI)

1. *Describe other forms of investment not described in § 92.205(b).*
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.*
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. At a minimum these guidelines must:*
 - a. *Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.*

- b. *Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.*
 - c. *State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.*
 - d. *Specify the required period of affordability, whether it is the minimum 15 years or longer.*
 - e. *Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally designated Empowerment Zone or Enterprise Community.*
 - f. *State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.*
4. *If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives:*
- a. *Describe the planned use of the ADDI funds.*
 - b. *Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.*
 - c. *Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.*

Program Year 3 Action Plan HOME/ADDI response:

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

None are proposed in the third 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.*

The HOME funds are sought from the North Shore Consortium (NSHC), of which the City of Peabody is the lead community. The NSHC distributes funds on a formula basis, whereby the percentage of low-mod households, as per the 2000 census forms the basis of the allocation. (See the NSHC HOME Consolidated Plan for more information).

We anticipate that the City will receive at least \$153,120 for Program Year 3 (2012-2013).

Resale Restrictions are administered by the North Shore HOME Consortium as follows.

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.

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.*
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.*
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.*
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.*
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.*

Program Year 3 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.

The NSHC HOME Consortium estimates that \$###,### will be used in the City of Peabody from McKinney-Vento funds.

The City is allocating CDBG resources to the following organizations whose programs are focused on preventing homelessness:

Catholic Charities / Homelessness Prevention Program \$###
This program provides emergency financial assistance for residents of Peabody facing eviction or moving from homelessness to permanent housing.

NSCAP / Homelessness Prevention Law Project \$###
Homelessness Prevention Law Project- provides counseling, landlord negotiation and legal council to people at risk of homelessness.

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 ultimate goal in providing shelter for homeless households is to maximize those who are able to secure and maintain themselves in permanent housing. For those who are placed in transitional housing, the CoC will work to increase access to affordable permanent housing by working with the PHA and the State, to identify opportunities and to adopt waiting list preferences. Secondly, the CoC will work to expand community-based services so that people will feel comfortable making that change to permanent housing, knowing that there will be necessary supports available, should they need them.

A central goal of the CoC is to further develop and implement a long-term plan to end homelessness, with particular attention on the

creation of permanent housing, both with and without supportive services.

Obstacles include insufficient shelter beds, and timing of availability, such that at times there may not be a space available for a person on the night that they need it.

See the Continuum of Care Submission for further detail.

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 are central to the focus of addressing chronic homelessness. Chronically homeless individuals are likely to 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, NSCAP and the Lynn Housing Authority and Neighborhood Development are the co-conveners of the North Shore Housing Action Group, the regional network of homeless providers, that has been designated by the ICCH. This group has identified 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 are all key 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.

A cornerstone in the eradication of chronic homelessness is the provision of permanent supportive housing. 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 the use of regular HCV's, there are a number of vouchers available for use by special populations. As part of its planning, the CofC continues to work with PHAs and regional administering agencies to be able to make vouchers available to the chronically homeless.

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 April 1, 2012, there are 39 homes in default, 56 are bank owned and 47 are scheduled for auction in Peabody. According to a number of agencies, the unemployment rate for those under the age of 25 in Massachusetts has grown substantially. None of the communities within the North Shore CofC area received its own allocation of HPRP funds from HUD. However, communities, including Peabody, 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, 2012. 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.

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. These policies can be examined in the CoC program documents.

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.

Program Year 3 Action Plan ESG response:

N/A

COMMUNITY DEVELOPMENT

Community Development

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

- 1. 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.*
- 2. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.*

*Note: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

Program Year 3 Action Plan Community Development response:

- 1. 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), – i.e., public facilities, public improvements, public services and economic development.

Priority non-housing community development needs are shown in the Community Development sheet in *needs.xls* in the CPMP.

Some neighborhoods in the City have outdated and aging infrastructure in need of repairs. Programs to improve small businesses and neighborhood centers through storefront improvements and commercial area improvements serve to expand privately available services, expand employment and improve community life.

The City continues to support expanded recreational opportunities and necessary public facilities that meet the diverse needs of the population, especially children, elders and households with low and moderate incomes. The City places a high priority on continued support to public service agencies and organizations that provide essential services.

The City has also engaged in extensive, collaborative and public planning to improve economic opportunity, housing choices, parks and recreational facilities and overall quality of life. The envisioned community improvements and investments will utilize public and private resources to address the needs identified through the planning process. The City's investments will add to the revitalization of neighborhoods and provide adequate infrastructure to support private developers.

The City of Peabody will continue to examine non-housing needs in the community which warrant investment in order to foster economic strength and sustain and create jobs. The City has made the downtown area a focus fostering the arts community with live-work space and with improvement of façade, signage and generally those activities which will strengthen local businesses.

Table 10: Community Development Budget Allocations 2012-2013

Project	Agency	Budget Allocation
Main Street Corridor	Department of Community Development	###,###

2. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

Table 11: Priority Non-Housing Objectives 2012-2013

PRIORITY OBJECTIVES	Target Population	Estimated Beneficiaries 2012-2013
GOAL A: ECONOMIC DEVELOPMENT		
Priority Objectives:		
1. Provide resources to projects that create and/or retain jobs		
2. Provide services that improve economic opportunity for low and moderate income people	All LI Families	
3. Increase the economic opportunities for persons with special needs	ELI-VLI-LI Non-Homeless Special Needs	
4. Encourage sustainable growth		

GOAL D: INFRASTRUCTURE		
Priority Objectives:		
1. Improve quality/increase quantity of public improvements that benefit LMI persons	All LI HHs	TBD
GOAL E: FACILITIES		
Priority Objectives:		
1. Improve quality/increase quantity of neighborhood facilities serving LMI persons	All LI HHs	
2. Improve quality/increase quantity of facilities that benefit the elderly	All LI Elderly HHs	TBD
GOAL F: PUBLIC SERVICES		Also See Housing Priority Objectives
Priority Objectives:		
1. Improve services for the elderly	All LI Elderly HHs	
2. Improve services for disabled adults	All LI Disabled HHs	
3. Improve services for women and children fleeing domestic violence	All LI Families	
4. Improve services to low and moderate income households.	All LI Families	
5. Increase range of housing options and related services for persons with special needs	All ELI-VLI-LI Special Needs HHs	
6. Provided supportive services to help prevent homelessness	All HHs facing homelessness	
7. Provide housing and supportive services for persons with HIV/AIDS and their families	All HHs with HIV/AIDS	
8. Provide resources to assist residents at risk of foreclosure	All LI HHs	

The City of Peabody's current planning documents drive the City's Strategic Plan. These documents include: The Master Plan, adopted in 2001; the Downtown Action Plan; the Affordable Housing Strategy (2003); the 2020 Transportation Plan; the updated Recreation and Open Space Plan; and the five year Capital Improvement Plan. Based on the above referenced documents, the needs assessment and market study, as well as input from citizens and service providers, and in accordance the CDBG program's National Objectives, the City of

Peabody has established the following priorities for the one-year period 2012-2013:

Expanding Economic Opportunities:

Economic Development: Funds will be made available to improve economic opportunity for low and moderate income people. Priority will be give to those projects that create and/or retain jobs;

Providing Decent Housing:

Affordable Rental Housing: Funds will be allocated to increase the supply of affordable rental housing (particularly for households earning 50% of AMI or less), to improve the quality of rental housing and to improve access to such housing;

Energy Efficient Housing: The City of Peabody will utilize CDBG and HOME funds to eliminate health and safety hazards, abate lead paint hazards, and provide improved accessibility to insure the health and safety of Peabody residents. The City will implement improved energy efficiency strategies to retrofit existing homes whenever possible.

Foreclosure/Homelessness Prevention: The City of Peabody will provide resources to organizations that assist residents at risk of foreclosure and/or homelessness.

Providing a Suitable Living Environment

Sustainable Growth: The City of Peabody will encourage planning and development of projects that will integrate transportation and housing needs and improves access to both.

Public Services: Funds will distributed to projects that support basic human service needs through funding of emergency services; address the service needs of special needs groups, including improving services for seniors, elderly and disabled individuals, so that they can participate fully in the community; and, provide a supportive services for low-income individuals and families with children.

Municipal Facilities: Funds will be made available to improve the quality, accessibility and increase the quantity of neighborhood facilities serving LMI persons.

Antipoverty Strategy

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

Program Year 3 Action Plan Antipoverty Strategy response:

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

Most activities undertaken by the Department of Community Development with CDBG and other federal and state funds for low income families are efforts to reduce the number of persons in poverty and improve the quality of life for Peabody residents, either directly or indirectly. The staff also works in partnership with citizens, other City departments and the public and private sectors to accomplish its goal of reducing poverty.

CDBG programs, which can be used and which directly influence the household income level include: job training, job counseling and placement, education and business development.

In the next year, the focus will be on job development and economic stabilization and the City will be funding the following direct activities:

- Facade/Signage Improvement Program (in collaboration with CDA)
- Downtown Market Study (in conjunction with city-wide rezoning effort, increases in public/park land, traffic realignments and flood mitigation)

CDBG programs can be used and can indirectly influence the impact on household living by those at or below the poverty level, by reducing other costs including, affordable housing, energy efficiency, public transportation and health care assistance.

In the near future the City will be funding the following indirect activities:

- Housing rehabilitation including energy efficiency improvements
- Homelessness and foreclosure prevention assistance
- Health services – both physical and mental

- Mentoring and other educational enrichment services
- Revitalization and economic development activities

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.*

Program Year 3 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 City, 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, victims of domestic violence, developmentally disabled, physically disabled, substance abusers, and persons with HIV/AIDS.

The City of Peabody is aware of the needs of special populations and is committed to supporting initiatives which target these populations. As part of its strategy, the City is committed to provide assistance to transitional housing programs and related services offered through NSCAP and local non-profit organizations. These housing programs provide shelter and support services to low income households, who also have either health issues, substance abuse and/or mental health concerns, are victims of domestic violence or are physically or developmentally disabled.

- 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 approach to addressing the needs posed by these populations has changed over the past 20 years. In response, a variety of public and private sector resources are available to address some of the current approaches to housing and service needs for these groups. These resources are limited and insufficient to meet all the needs identified. The members of these subpopulations frequently require assistance from multiple sources, in order to succeed in daily life.

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 Section 8 Project Based Assistance), 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. Other state agencies serving the elderly in the City include EOEA and the EOHHS. Massachusetts also has a variety of community-based programs serving the elderly. The Peabody Council on Aging has an extensive set of services focused in its senior center (Peter A. Torigian Community Life Center). The City is also serviced by North Shore Elder Services its Area Agency on Aging. Programs implemented to meet the needs of elderly residents include subsidized housing; adult day care; home care; congregate housing; nutrition; guardianship; legal services; transportation; assistance with health care administration; social activities 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. Funds from the HOME Consortium have been available to create accessibility, through physical rehabilitation and to adapt housing to meet the needs of the physically disabled, as well as meeting ADA and Section 504 requirements.

The number of adults with mental illness or developmental disabilities who are treated in institutions, has continued its dramatic decline. Correspondingly, the number receiving community-based services has significantly increased. DMH and DDS, are the primary service systems for providing services and housing (through the use of state and private housing providers), to these populations.

At the level of local government, the City has the Peabody Housing Authority, Human Services departments, Veteran's Agent and a Council on Aging, as mentioned above, all of which concentrate at least some of their services on these populations, utilizing funds from various private, state and federal sources. HOME funds from the

Consortium have been made available for providing assistance in the acquisition, development and rehabilitation of supported housing. HOME funds also assist through the provision of tenant-based rental assistance. In addition, non-profit organizations, including CHDOs within Peabody typically administer programs targeted to these populations, some of which are funded through the state agencies listed above and others which are funded with federal resources or through public and private grants or a combination of these sources.

Housing Opportunities for People with AIDS

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

- 1. Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.*
- 2. Report on the actions taken during the year that addressed the special needs of persons who are not homeless but require supportive housing, and assistance for persons who are homeless.*
- 3. Evaluate the progress in meeting its specific objective of providing affordable housing, including a comparison of actual outputs and outcomes to proposed goals and progress made on the other planned actions indicated in the strategic and action plans. The evaluation can address any related program adjustments or future plans.*
- 4. Report on annual HOPWA output goals for the number of households assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. Include any assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.*
- 5. Report on the use of committed leveraging from other public and private resources that helped to address needs identified in the plan.*
- 6. Provide an analysis of the extent to which HOPWA funds were distributed among different categories of housing needs consistent*

with the geographic distribution plans identified in its approved Consolidated Plan.

7. *Describe any barriers (including non-regulatory) encountered, actions in response to barriers, and recommendations for program improvement.*
8. *Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.*
9. *Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.*

Program Year 3 Action Plan HOPWA response:

Not Applicable

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.

Program Year 3 Specific HOPWA Objectives response:

Not Applicable

Other Narrative

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