

Fourth Program Year Action Plan Narrative Responses

TABLE OF CONTENTS

TABLE OF CONTENTS	1
Executive Summary.....	3
Executive Summary Response - Introduction	3
Executive Summary Response: Objectives and outcomes identified in the One-Year Action Plan.	4
Executive Summary Response: Evaluation of Past Performance	5
GENERAL QUESTIONS	7
MANAGING THE PROCESS	14
CITIZEN PARTICIPATION.....	16
Statement of Policy.....	16
Public Meetings in Development of the 5 Year Consolidated and Annual Action Plan.....	16
Organizations and Municipal Departments Contacted and Consulted in Preparation of the Plan	16
INSTITUTIONAL STRUCTURE.....	19
MONITORING	20
Section 3 Compliance	22
Fair Housing Compliance.....	22
LEAD-BASED PAINT.....	23
HOUSING	24
SPECIFIC HOUSING OBJECTIVES	24
NEEDS OF PUBLIC HOUSING	27
BARRIERS TO AFFORDABLE HOUSING.....	27

HOME/ AMERICAN DREAM DOWN PAYMENT INITIATIVE (ADDI)	28
HOMELESS	31
Specific Homeless Prevention Elements	31
EMERGENCY SHELTER GRANTS (ESG)	38
COMMUNITY DEVELOPMENT	39
ANTIPOVERTY STRATEGY	39
NON-HOMELESS SPECIAL NEEDS HOUSING	40
Non-homeless Special Needs (91.220 (c) and (e))	40
HOUSING OPPORTUNITIES FOR PEOPLE WITH AIDS	42
Specific HOPWA Objectives	43
ATTACHMENT A - CITIZEN PARTICIPATION PLAN	44
Attachment B – Minutes from Community Meetings and Public Hearings ...	49
Attachment C – Calculation of Distribution of Funds	55

INDEX OF TABLES

TABLE 1: ESTIMATED HOME ALLOCATION FUNDING 2010-2014	5
TABLE 2: LOW-MOD AND RACIAL/MINORITY CONCENTRATIONS (2000 CENSUS).....	8
TABLE 3: MINORITY PERCENTAGES	10
TABLE 4: BUDGET FY 2012	5

TABLE OF CHARTS AND MAPS

MAP 1: NSHC AREA	8
CHART 1: DISTRIBUTION OF FUNDS 2012.....	55

CPMP ATTACHMENTS

GOALS.XLS
PROJECTS.XLS
SUMMARIES.XLS
NEEDS.XLS
HOMELESS NEEDS.XLS

Executive Summary

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

Executive Summary Response - Introduction

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

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

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

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

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

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

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

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

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

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

- Goal 1 Assist in creating or preserving 41 affordable rental units;
- Goal 2 Ensure that deep enough subsidies are in place to make a percentage of units truly affordable to very low and extremely low income households and the homeless
- Goal 3 Ensure that a percentage of the units created are accessible to persons with disabilities.
- Goal 4 Provide tenant-based rental assistance to approximately 40 low-income households, including those with special needs.
- Goal 5 Develop partnerships with housing providers who create housing for special needs populations.

OBJECTIVE #2 Reduce individual and family homelessness

- Goal 1 Coordinate with the continuum of care system for the region with a focus on ending homelessness;
- Goal 2 Channel HOME funds to activities that create permanent and transitional affordable housing units for homeless persons.
- Goal 3 Provide tenant based rental assistance to homeless and at risk households (see rental objective #1, goal 4, above)

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

- Goal 1 Rehabilitate and/or remove barriers to accessibility for approximately 5 housing units, including units owned by elderly persons, disabled persons, and other special needs

groups.

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

- Goal 1 Provide down payment assistance to approximately 13 low to moderate income households to allow them to become homeowners;
- Goal 2 Create 1 new affordable homeownership units for very low income households.

TABLE 1: Estimated HOME Allocations FY 2013

<i>Program</i>	<i>HOME Budget</i>
HOME Rental Housing Production	\$ 565,675.17
HOME Housing Rehabilitation	\$ 85,115
Homeownership Production Programs	\$ 30,000
Tenant-Based Rental Assistance	\$ 300,000
Homeownership Downpayment Programs	\$ 120,000
HOME Administration	\$ 122,309
TOTAL of All Programs	\$ 1,223,099.00

Executive Summary Response: Evaluation of Past Performance

The North Shore HOME Consortium has provided funding for the creation of 93 units of affordable housing for low and moderate income households through the use of HOME funds (to date) during this current program year - FY2012. This assistance was utilized for the creation of affordable rental units, for downpayment and rehabilitation assistance to homeowners, and for tenant based rental assistance programs.

During this period, funds were allocated for the development of 39 new units of affordable rental housing. This includes the development [rehabilitation of an existing structure] of two units of rental housing to serve homeless or formerly homeless families with very-low incomes by the non-profit CHDO organization Emmaus, Inc., in Haverhill.

Also during this time frame, First Time Homebuyer Down Payment Assistance programs in the Consortium assisted 6 low- to moderate-income households to enter into the home ownership market.

Housing Rehabilitation programs in the region made renovations and improvements to the homes of 3 low and moderate income homeowners to bring units up to meet state and local building and health codes and to allow homeowners to remain in their homes.

The Consortium also funded two types of Tenant Based Rental Assistance programs during this time frame: A program to provide security deposit assistance to help households to afford the initial expense of renting an apartment, and a short term rental subsidy program which assisted households with paying a portion of their rent for one year. These rental assistance programs served approximately 45 households using PY 2012 funding. A major focus of this program has been toward assisting homeless families into permanent housing and these funds are also utilized to prevent families from becoming homeless.

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

The Consortium's approach to citizen participation this year has been to continue and where necessary, improve upon the process used in prior years. Groups active in areas which use or could use resources were made aware of the process by advertisements, public notices and direct e-mail messages. In addition, this same group was invited to send in comments through direct mail and/or email if they were unable to attend any of the meetings.

The planning and citizen participation activities for this action plan began approximately three months before the Action Plan was finalized, utilizing community outreach meetings. These meetings were 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. This year, the Action Plan public hearings generated unexpected feedback on the topic of homelessness. A well-known Peabody resident /businessman attended the Peabody Public Hearing in the hope of opening up a dialog about funding a homeless shelter in Peabody. He cited his own observations and conversations with men and women that he has met in his daily travels around the city to support the case that there is a need to look into this matter to determine if anything can be done to assist these people. Since a homeless shelter is not an allowable use of HOME

funds, the matter cannot be addressed as part of this plan, but the issue warrants review relative to the work that the Consortium is doing to support the homeless through affordable housing development and Tenant Based Rental Assistance programs targeted to this population.

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

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

General Questions

Action Plan: General Questions & Responses:

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

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

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

Map 1: NSHC Area

North Shore Home Consortium

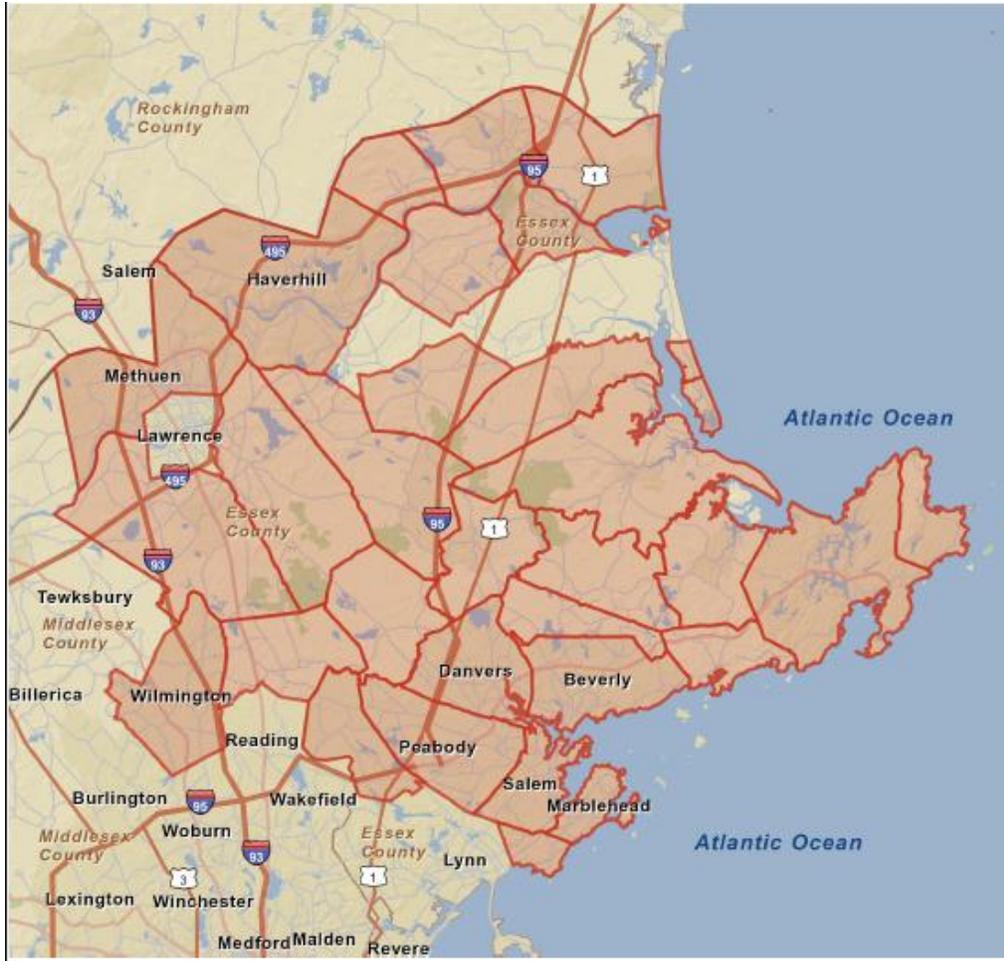


Table 2: Low-Mod and Racial/Minority Concentrations¹ (2000 Census)

Community	Total Population	Low-Mod Population	% Low-Mod 2000
Amesbury	16,450	2,821	17.15%
Andover	31,247	2,934	9.39%
Beverly	39,862	6,324	15.86%
Boxford	7,921	338	4.27%
Danvers	25,212	3,713	14.73%
Essex	3,267	499	15.27%

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

North Shore Home Consortium

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

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

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

One factor continuing to affect some of our communities is the foreclosure crisis. The rate of residential foreclosure has somewhat stabilized over the past year, but the effects are still being felt in some communities that were the hardest hit. For the past several years the number of foreclosed properties had greatly increased nationwide due to multiple factors ranging from sub-prime lending practices to the high unemployment rate. The

Neighborhood Stabilization Program [NSP] required HUD and the State to identify communities with significant foreclosure problems and within those communities, the neighborhoods hardest hit. Within the Consortium, the communities of Haverhill, Methuen, Peabody and Salem were identified as having the highest numbers of foreclosures. This foreclosure crisis in general, and the needs of those communities most impacted by it, will be considered in the allocation of HOME resources.

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

Table 3: Minority Percentages²

Community	% Minority 2009 Estimate
Amesbury	4.19%
Andover	14.85%
Beverly	6.36%
Boxford	4.23%
Danvers	3.67%
Essex	2.21%
Georgetown	2.26%
Gloucester	4.75%
Hamilton	10.06%
Haverhill	17.46%
Ipswich	3.80%
Lynnfield	5.33%
Manchester	1.65%
Marblehead	3.82%
Merrimac	2.67%
Methuen	18.04%
Middleton	6.64%
Newburyport	3.00%
North Andover	11.00%
North Reading	3.72%
Peabody	9.77%
Rockport	3.52%
Rowley	2.51%
Salem	25.11%
Salisbury	3.78%

² ESRI 2009

Community	% Minority 2009 Estimate
Swampscott	3.93%
Topsfield	3.50%
Wenham	3.52%
West Newbury	2.36%
Wilmington	5.75%
NSHC Total	8.55%

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

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

1. Each year, an initial amount of \$300,000 is set aside from the HOME allocation for projects to be funded through a Competitive Funding Process. The Allocation Committee releases an RFP, evaluates proposals received, and rates each submission based upon the established priorities as well as other considerations; This amount is typically increased by the addition of uncommitted funds from communities (see step 3 for more on this)
2. 10% of each year's *total* annual allocation, or approximately \$122,309, is set aside for Planning and Administration of the HOME grant. This year 7% will be utilized by the Consortium for oversight of the program [approximately \$85,616]. 3% will be available to be utilized by the communities and sub-recipients for their administration of the programs;

3. The remaining amount (approximately \$800,790) is distributed among each of the 30 communities using a formula based on the number of low-mod households identified in each community (utilizing figures from the 2000 U.S. census). Communities have one year to commit funds to activities, and any uncommitted funds at the end of that period are reallocated to the Competitive Funding Pool (*see #1, above*)
4. Program income is estimated to generate about \$25,000 per year. It has been the Consortium's policy to return program income to the community whose investments in housing generated it. If not committed within one year, those funds are also reallocated to the competitive funding pool.

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

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

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

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

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

The NSHC will continue to work with and support public non-profit agencies such as local housing authorities, human service organizations, Councils on

Aging and other elder service organizations, homeless providers and other special needs providers, in their mission to meet the needs of the underserved population of the area.

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

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

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

Based on past experience, the NSHC anticipates that member communities will use a variety of funding sources for the year 2013-2014.

Federal Funds

All of the 30 NSHC communities make up the Continuum of Care which through the McKinney-Vento program and other sources provides significant funding for the homeless. Some of the communities are CDBG entitlement communities while others received funds from the Commonwealth of Massachusetts CDBG allocation administered by DHCD. Some of the communities have Federal public housing while most have HCV allocations for rental vouchers. From time to time some of the communities receive other Federal assistance such as Section 202, Section 811, NSP, DOE and DOT funding, which are often used in conjunction with HOME funds.

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

State Funds

Most of the communities have State public housing and some have State rental vouchers. In addition, the State has the HSF and HIF programs which are almost always used with HOME funds. The State also provides LIHTC funding, which some of the communities have used from time to time. It is estimated that the total State funds which might become available between the 30 communities will be in excess of \$35m.

Local Funds

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

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

Managing the Process

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

The lead agency for overseeing the development of the NSHC Consolidated Plan as well as its administration and reporting to HUD is the City of Peabody with its Department of Community Development carrying out the day-to-day management of the program. The City of Peabody sets aside ten percent of the total HOME allocation for administrative costs, with 7% allocated for the direct administration of the Consortium and 3% for administrative expenses of communities which use HOME funds.

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

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

- North Shore Community Action Programs, Inc.
- Turning Point, Inc.
- Lifebridge
- Lynn Shelter Association
- Haverhill Housing Authority
- Emmaus, Inc.
- Veterans Northeast Outreach Center
- Action, Inc.
- River House

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

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

The staff of the North Shore HOME Consortium, acting through the City of Peabody's Department of Community Development, oversees the development and management of the Five Year Consolidated Plan and each year's annual Action Plan. The NSHC has also drawn from its many years of experience in administering the HOME program and in submitting such plans to HUD. Community members and groups interested in the development of affordable housing were made aware of the development of the Plan by advertisements and public notices and were invited to submit suggestions, ideas and requests for support

Other key partners in the NSHC's planning are the two CHDO's which are based in Haverhill and Gloucester. Various providers of services to the homeless were also consulted during the year and during this specific planning process.

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

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

Affirmative Marketing

The North Shore HOME Consortium has a written plan to describe its methods of affirmatively marketing HOME-assisted housing. However, it is the Consortium's consistent policy to require each HOME-assisted development consisting of five or more affordable units to present a project specific affirmative marketing plan for the Consortium's review and approval. This often occurs as a collaborative effort with DHCD in order to demonstrate compliance with the requirements of these other funding sources.

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

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

Citizen Participation

1. Provide a summary of the citizen participation process.

Statement of Policy

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

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

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

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

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

The meetings, widely advertised throughout the Consortium by email and website announcements, were also advertised in the following media on

February 14th, 2013, and March 27th, 2013: The Salem News (serves most of the North Shore), The Eagle Tribune (covers the Merrimack Valley), the Gloucester Times, The Newburyport News, and the Wilmington Town Crier. Notices were placed in the Bay State Banner and El Mundo, the two minority newspapers in the region.

Meetings were held as follows:

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

1. At City Hall in Haverhill on February 28th, 2013 at 11:00 A.M., and in
2. At Peabody City Hall on February 28th, 2013 at 5:00 P.M.

The draft Plans were made available on March 27th, 2013 at the offices of the City of Peabody Department of Community Development located at 24 Lowell Street Peabody and on the City's website. On the next business day copies were sent to the Planning, Economic, Housing and Community Development departments (or other similar offices, such as Board of Selectmen offices) of NSHC member municipalities. The draft Plans were also made available online at www.peabody-ma.gov and by request during the 30 day public comment period. Additional outreach and advertising was done to solicit feedback on the contents of that document. Two Public Hearings were conducted to allow the public an opportunity to come and discuss the Second Year Action Plan. Those meeting were held:

- At the City of Haverhill, City Hall, Room 302, 4 Summer Street in Haverhill on Thursday, April 11th starting at 11:00 A.M., and
- At Peabody City Hall, 24 Lowell Street in the lower level Conference Room, Peabody on Thursday, April 11th, starting at 5:00 P.M.

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

During the community meetings and planning process prior to the draft being issued, the Consortium received comments from several different organizations. A copy of the minutes from each of those meetings – along with a copy of the written comments presented – is attached as **Exhibit B**.

To summarize the Community Meetings, the first, held in Haverhill, was well attended with representatives from the local Veteran's Northeast Outreach Center, from the non-profit development organization Harborlight Community Partners, from the non-profit developer Coalition for a Better Acre, a representative from the Planning Office of Urban Affairs, and two representatives from the City of Haverhill. Those present shared the opinion that the greatest need in the region is for the creation of affordable rental housing units. The City of Haverhill stated the need to continue to provide Homeowner housing rehabilitation programs as well.

The Second Community Meeting, held in Peabody, was attended by a well-known Peabody resident /businessman who had come in the hope of opening up a dialog about funding a homeless shelter in Peabody. He cited his own observations and conversations with men and women that he has met in his daily travels around the city to support the case that there is a need to begin looking into this matter to determine if anything can be done to assist these people. Since HOME funds cannot be used for the creation of emergency shelter units, the conversation turned to more achievable goals such as creating a grass roots group of citizens who might investigate the issue and speak to City officials about their ideas. Also in Attendance was a representative from North Shore Community Action Programs, who stressed the importance of tenant based rental assistance as a tool to help clients move from homelessness to independence.

Information on Public Hearings to be inserted after April 11th

All comments received will be incorporated into the final version of the Fourth Year Action Plan.

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

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

If, at any time, it is anticipated that a significant number of non-English speaking residents can be reasonably expected to participate in public meetings or participate in the planning and evaluation process of the Consolidated Plan, an interpreter will be secured. Also, it is intended that

the hearings will be held at times and locations convenient to potential and actual beneficiaries, and with the accommodations for persons with disabilities.

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

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

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

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

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

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

Institutional Structure

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

Action Plan Institutional Structure response:

As more than three quarters of the annual allocation are made available to the member communities, the working relationship between the Peabody

Community Development staff and local communities is critical. A primary element of this relationship is to ensure that a community which is being funded has the capacity to create and manage programs.

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

The Consortium is able to meet its local match requirements – with the assistance of the Peabody Housing Authority – by calculating the amount of state-assisted vouchers under the Massachusetts Rental Voucher Program [MRVP] where the number of units in Peabody alone more than meets that HOME requirement.

Because the Consortium – as a participating Jurisdiction – is not a direct recipient of funds through the Emergency Solutions Grant Program [ESG] there is not match requirement. Individual applicants within this service are able to document their own match requirements on a program by program basis.

Monitoring

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

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

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

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

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

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

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

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

As an entity comprised of thirty communities, the Consortium has completed more than twenty-five 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 contracted with a consultant to handle the monitoring responsibilities. This approach has been used successfully for the past five years. The Consultant is an organization with over twenty years of experience in monitoring federally funded affordable housing for compliance with federal requirements. The Consultant continues to conduct on site inspections of Consortium sub-recipients to ensure that their programs and actions are in compliance with HOME program and Consolidated Plan requirements. In addition, the Consultant has conducted on site inspections of affordable rental housing units assisted under the program to determine compliance with housing codes, income guidelines, and financial management guidelines. Results of these inspections are sent in the form of

a letter to the sub-recipients, with recommendations and suggestions on how to correct any possible “findings”, and a forty-five day response period is given for adherence to those corrective actions. At the end of that period the activity is reviewed and the corrective actions taken are noted for the files.

Davis Bacon Compliance:

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

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

NSHC’s staff conducts site visits when needed, conduct employee interviews and check the weekly payroll forms for accuracy and compliance.

Section 3 Compliance

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

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

Minority Business Outreach

The North Shore HOME Consortium complies with the requirements to conduct outreach to the minority business community by providing oversight and monitoring to all development activities where construction and the purchase of materials would warrant such outreach. A large majority of the HOME-assisted projects in this service area appear not to draw interest in bidding because of their smaller scale.

Fair Housing Compliance

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

Lead-based Paint

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

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

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

ENERGY STAR REQUIREMENTS – Compliance

The North Shore HOME Consortium has adopted a policy several years ago that requires that all HOME-assisted activities where new construction is involved, or where the level of rehabilitation activities is so substantial that the existing structure is to be gutted to the bare walls, that project must comply with Energy Star standards.

HOUSING

Specific Housing Objectives

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

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

The priorities and specific objectives for the Annual Plan (2013) are as indicated below.

OBJECTIVE A: DEVELOP AN ADEQUATE SUPPLY OF SAFE, DECENT RENTAL HOUSING THAT IS AFFORDABLE AND ACCESSIBLE TO RESIDENTS WITH A RANGE OF INCOMES INCLUDING THOSE WITH SPECIAL NEEDS			
Strategies:	Target Population	1 Year Priority	1 Year Goals
1. Assist in creating or preserving 41 affordable rental units	Households below 60% of AMI	HIGH	41
2. Ensure that deep enough subsidies are in place to make a percentage of units truly affordable to very low and extremely low income households and the homeless	Extremely Low Income (<30% AMI), Very Low Income (30%-50% AMI)	HIGH	
3. Ensure that a percentage of the units created are accessible to persons with disabilities	Disabled persons	HIGH	
4. Provide tenant-based rental assistance to 40 low-income households, including those with special needs	Households including those with Special Needs below 60% of AMI	HIGH	40
5. Develop partnerships with housing providers who create housing for special needs populations	Special Needs Households	HIGH	
OBJECTIVE B: REDUCE INDIVIDUAL AND FAMILY HOMELESSNESS			
Strategies:	Target Population	1 Year Priority	1 Year Goals

North Shore Home Consortium

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

--	--	--	--

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

Strategies:	Target Population	1 Year Priority	1 Year Goals
Rehabilitate and/or remove barriers to accessibility for 5 housing units, including units owned by elderly persons, disabled persons, and other special needs groups	Elderly, Disabled and Special Needs at or below 80% AMI	HIGH	5

OBJECTIVE D: EXPAND HOMEOWNERSHIP OPPORTUNITIES FOR LOW-INCOME HOUSEHOLDS

Strategies:	Target Population	1 Year Priority	1 Year Goals
1. Provide down payment assistance to 13 low to moderate income households to allow them to become homeowners	Extremely Low Income (<30% AMI), Very Low Income (30%-50% AMI) and Low Income (50%-80% AMI)	Medium	13
2. Create 1 new affordable homeownership units for very low income households	Very Low Income (30%-50% AMI) Households	Medium	1

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

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

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

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

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

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

Needs of Public Housing

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

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

It continues to support the PHAs which have residents and participants who apply for homeownership assistance, focusing on those coming out of Family Self Sufficiency programs. In addition it intends to work closely with the efforts of the 8 PHAs which have HCV Homeownership programs and to encourage those which don't, to amend their PHA Plans to create such a program.

In addition, while none of the 7 PHAs with federal public housing have adopted a Section 32 homeownership program, the NSHC will be working to encourage them to do so, especially as a recent HUD study indicated that some of the more successful homeownership production collaborations have been between PHAs and HOME PJs.

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

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

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

Barriers to Affordable Housing

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

Massachusetts law [Chapter 40B] requires local governments to have at least 10% of its housing stock affordable to households below 80% of median in order, to retain full control over the zoning permit process when affordable units are proposed. The nature of that affordability is defined by

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

The NSHC encourages local communities to pursue any strategy which enables affordable housing production. Throughout the year, speakers will be invited to address the members of the Consortium on a variety of issues. These may include representatives from state agencies and/or housing advocacy groups.

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

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

HOME/ American Dream Down payment Initiative (ADDI)

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

None are proposed this year.

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

Resale Restrictions are administered by the North Shore HOME Consortium.

The Consortium has adapted to changes in the housing market and has adopted new policies for the homebuyer assistance programs within this

jurisdiction. These policies - along with the added flexibility that they bring to local homebuyer assistance programs - will remain in effect over the next five years.

(1.) It has been the policy to provide assistance to income-eligible homebuyers in the form of a loan at a zero interest rate with no monthly payments. The Consortium's policies adhere directly to the HOME regulations on this issue, the only local provision which has been added to that is that the homebuyer assistance has been made available to first-time homebuyers. On the federal level the HOME regulations have changed to allow for this assistance to be made available to *any* income-eligible buyer (i.e., whether a first-time buyer or not).

When the property is sold, the entire amount loaned must be repaid to the lender with a limit that this amount will not exceed the net proceeds derived from the sale of the house. 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 additional (alternative) 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 on the sale of such HOME-assisted property to limit the sale *ONLY* to another income-eligible household. It is the Consortium's policy to allow for a fair return on the homebuyer's investment which will be based upon the percentage of change in the median sales price and will allow for the homeowner's investments and capital improvements to be included in any calculation. The Consortium will closely adhere 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.*

During Program year 2011 the members of the North Shore HOME Consortium voted unanimously to adopt a new policy on a limited, (for a two-year funding cycle) trial basis. Beginning on July 1st, 2012 and ending on June 30th, 2014 the Consortium will allow for the use of HOME funds to refinance existing debt as long as it is a part of a rehabilitation activity and the cost of the rehabilitation is at least 51% of the total project budget.

Policy Change to Expand the Allowable Uses of HOME Funds

Adopted at Meeting of the North Shore HOME Consortium on May 9th, 2012

The North Shore HOME Consortium has adopted a new policy relative to the way HOME funds may be used. This change will allow for HOME funds to be used to refinance existing debt, as long as that use is a component of housing rehabilitation activity. This expanded use of funds will be allowed on a time-limited basis from the beginning of the program year starting on July 1st, 2012 and will be discontinued (or reconsidered) on June 30th, 2014.

This use will be allowed for projects located in the Consortium's member communities, and priority consideration will be given in the Consortium's competitive process where the percentage of affordable units in that community's Subsidized Housing Inventory [SHI] is lower than 10% of its total housing stock in accordance with the current state-issued inventory. However, individual communities may opt to use funds available to that community for this purpose at their discretion providing other criteria stated herein are met.

In accordance with regulatory requirements (*subsection §92.206 of the Final Rule – the federal regulations governing the use of HOME funds*), HOME funds may only be used to refinance existing debt when this use is included in a HOME-assisted rehabilitation project where the cost of those renovations constitutes the majority of the funds to be used. A ratio of 51% of HOME funds being used for rehabilitation will be the minimum standard. It is also noted as a regulatory requirement that no additional HOME funds may be allocated to a development which was previously assisted with HOME funds during the HUD-prescribed Period of Affordability.

This expanded use will be allowed only in those instances it has been demonstrated to the satisfaction of the North Shore HOME Consortium that, upon the use of HOME funds for this purpose, the projected operating budget is determined to be sustainable for - at a minimum - the Period of Affordability required by that level of funding. The evidence of this will be documented by the submission of a financial pro forma, a description of the projected debt service coverage and by any additional information that may be deemed necessary by the North Shore HOME Consortium.

The applicant for HOME funds for this purpose must demonstrate a comprehensive effort to secure funding and to seek financial concessions from other funding sources before such refinancing activities will be allowed. The applicant is required to submit evidence of these efforts by presenting documentation determined to be satisfactory to the lender (awarding entity).

It is the Consortium's intention to allow for this use when it has been determined that the preservation of the affordability of existing affordable housing units are at a substantial risk of being permanently lost but for the use of HOME funds for the proposed refinancing. The Consortium continues to *prioritize* its funding to assist in the creation of new affordable units.

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

The ADDI program has been discontinued.

HOMELESS

Specific Homeless Prevention Elements

*** Please also refer to the Homeless Needs Table in the Needs.xls workbook.
Action Plan Special Needs response:**

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

NSHC and the Continuum of Care are serving basically the same communities. In the next year, the NSHC communities anticipate receiving \$1,699,533 through the McKinney-Vento program, to support emergency shelters, transitional and permanent supported housing. At the state level, assistance is provided by the Department of Housing and Community Development (DHCD) through the Division of Housing Stabilization and by

the Department of Transitional Assistance (DTA). The Supportive Services component may be provided through the Executive Office of Health and Human Services. Non-profit agencies continuously look to private grants and foundations to fill financing gaps.

The NSHC has stated repeatedly that addressing the needs of homeless families and individuals is among its top priorities. The NSHC has set specific one year and five year goals in channeling HOME funds to activities that create permanent and transitional affordable housing units for homeless persons and providing TBRA to homeless and at risk households. In addition, some of the Consortium's member communities also allocate CDBG funds to provide housing and services for the homeless.

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

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

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

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

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

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

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

In order for this goal to be achieved, there must be an adequate supply of appropriate, affordable housing and the associated stabilization services. To create the necessary emergency shelter, transitional housing and permanent supportive housing to meet the needs identified in the region, a combination of resources must be assembled. Actual units must be created and rental subsidies (which include mobile vouchers, project-based subsidies and/or vouchers) must be made available for defined populations (i.e., VASH, which are typically administered through local Public Housing Authorities and

regional agencies) and funds must be made available for the necessary services which will allow people to live outside of the shelter system.

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

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

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

A cornerstone in the eradication of chronic homelessness is the provision of permanent supportive housing. The supportive services required may include personal case management, job training, and life skills preparation. For long term success, the CofC realizes that it must increase the capacity of current homeless housing providers to create and operate housing for this population. The second way to achieve success is to engage the larger affordable housing community to incorporate chronically homeless housing in their own housing plans. In addition to regular Housing Choice Vouchers (HCVs), HUD has also provided funding to assist chronically homeless

veterans through VASH Vouchers. The funding continues in place. These vouchers combine Section 8 rental assistance for homeless veterans, with case management and clinical services provide through the Veteran's administration. Veterans must already be homeless in accord with HUD's definition of homelessness.

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.

Over the past year, the Consortium responded to requests from local nonprofit organization for the use of a portion of the HOME funds available for homeless prevention activities. In some instances, this was in the form of providing enough to assist a displaced household to get into a replacement housing unit by providing a first month's rent along with a last month's rent and/or a security deposit. Seeing that the resources available to the Consortium as a whole have been reduced by approximately half, the ability to direct funds for that purpose would diminish the resources available to support the creation of permanent affordable housing. The Consortium has also been advised that a number of different resources from state agencies has also diminished greatly. In the past six months, the North Shore Continuum of Care Alliance – acting through Emmaus, Inc. of Haverhill – attempted to utilize a modest level of funds available through the Emergency Solutions Grant [ESG] Program. Regrettably, that effort has met with limited success because of the restrictions imposed upon the use of those funds. Those efforts will be redoubled with the emergence of additional ESG funds (\$130,000) anticipated to become available on July 1st, 2013, or soon thereafter. In addition, the City of Peabody has used a portion of the CDBG funds that are available to Peabody to support the work of the North Shore Community Action Program, Inc. in their work with the local Housing Court to divert families at risk of eviction, resulting in homelessness. Again, with these amounts of CDBG being reduced this year, this type of assistance is clearly in jeopardy. By partnering with the participants in the two regional networks - The Merrimack Valley and North Shore Regional Networks – and with the participants if the Continuum of Care Alliance, new solutions will be pursued.

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

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

Foster Care:

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

Health Care:

The Executive Office of Health and Human Services (EOHHS), the state agency with oversight of publicly-funded health care, has developed and implemented a formal policy in place that ensures that people are not routinely discharged into homelessness (including homeless shelters, the streets, or other homeless assistance programs) from state-funded health care facilities. EOHHS has established Discharge Planning Standards, which are part of every Request for Proposal. These standards are reviewed during monitoring site visits, annual reports, review of the Department of Public Health (DPH) discharge and admission data, analysis of billing data, and Risk Management analysis. Programs that are funded by EOHHS/DPH are required to submit admission and discharge data on all clients, not just clients funded through EOHHS/DPH dollars, as well as billing and invoice data on all clients. EOHHS/DPH funded detoxification programs routinely discharge from their programs to state funded residential recovery programs or to state funded transitional support services.

Mental Health:

The State Department of Mental Health (DMH) has developed and implemented a formal policy in place (see regulation 104 CMR 27.09) that ensures that people are not routinely discharged into homelessness (including homeless shelters, the streets, or other homeless assistance

programs) from state-funded mental health facilities. The Department of Mental Health routinely discharges clients to their state-funded system of group homes. All state-funded mental health facilities are required to arrange for the necessary post-discharge support and clinical services needed to facilitate a smooth reentry to the community. Such measures must be documented in the client's medical record. All mental health facilities are required to make every effort to avoid discharge to the streets or shelters. All facilities are required to take steps to identify and offer alternative options to patients and must document such measures, including all competent refusals of alternative options by a patient, in the medical record. In the case of such a discharge the mental health facility must arrange for or, in the case of a competent refusal, identify post-discharge support and clinical services. The facility shall keep a record of all discharges to a shelter or the street in the approved form and submit such information to the Department of Mental Health on a quarterly basis.

Corrections:

The State Department of Corrections (DOC) has taken a proactive approach to discharge planning and has targeted resources towards specialized housing with services to prevent inmates from reentering the corrections system and/or becoming homeless again. There is a formal policy in place and implemented that ensures that ex-offenders are not routinely discharged into homelessness (including homeless shelters, the streets, or other homeless assistance programs). DOC routinely discharges inmates to traditional residential placement in the community. These include reunification with family, rental housing or state funded half way houses. The Department of Corrections issued a new policy in 2002 regarding the release preparation of inmates in their facilities. The policy includes the following components:

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

Emergency Solutions Grants (ESG)

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

Action Plan ESG response:

Although the Consortium is not a recipient of ESG funds – nor has it ever been a direct recipient of ESG funds for this service area – it is directly involved in this process in its capacity as the convener of the North Shore Continuum of Care Alliance. The Consortium’s role includes sharing of information from the Massachusetts Department of Housing and Community Development [DHCD] and its Division of Housing Stabilization concerning the availability of ESG funds from DHCD.

The Office of Housing Stabilization has established written standards for providing ESG assistance in accordance with HUD standards. Part of that process includes a centralized assessment system that has been developed by DHCD. The requirements for accessing ESG funds from this system will be more fully described in the Request for Responses that is anticipated to be released by the Office of Housing Stabilization within the next several weeks. Our expectation is that our Continuum of Care will be eligible to receive approximately \$130,000, as calculated by formula.

The Office of Housing Stabilization will make judgments concerning the awards of funds to each applicant organization and will evaluate each respective program in accordance with the performance standards that *they* have established. Staff members from the DHCD office have consulted with each of the 23 Continua of Care in Massachusetts. That office will have the primary responsibility for evaluating the outcomes of each specific ESG-funded program. That same office will have the primary oversight over all administrative policies and procedures regarding the use of these funds. Each participant will be required to participate in the local HMIS system and (additionally) to participate in the state HMIS.

The role of the North Shore HOME Consortium includes working with local service providers in determining funding priorities for the use of ESG and providing documentation of that local support as part of the application requirements for ESG funds. New state policies require a ‘sign-off’ from the North Shore Continuum of Care Alliance as a part of the application process. During the most recent funding cycle at DHCD, the Consortium [Continuum of Care] has supported one application for a regional program that will collaborate with three other shelter providers to use ESG funds to support the rapid re-housing of individuals who meet specific criteria.

COMMUNITY DEVELOPMENT

The 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.

Action Plan Community Development response:

Each of the four 'entitlement communities' within the Consortium's jurisdiction is preparing its own Community Development Action Plan; the City of Peabody's One-Year Action [CDBG] is being submitted simultaneously along with the Consortium's One-Year Action Plan [HOME].

Antipoverty Strategy

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

Action Plan Antipoverty Strategy response:

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

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

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

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

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

NON-HOMELESS SPECIAL NEEDS HOUSING

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

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

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

Action Plan Specific Objectives response:

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

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

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

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

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

In addition to the availability of federal public housing and other federally assisted housing programs for the elderly (primarily Section 202) and for the disabled (primarily Section 811 and PBA), Massachusetts is one of the few states which provides state-aided public housing for the elderly, for the frail elderly and for the non-elderly disabled through DHCD. Monies for the development of housing for clients of DMH and DDS are also available to non-profits through the Facilities Consolidation Fund. Other state agencies serving the elderly within the Consortium include EOEA and the EOHHS. Massachusetts also has a variety of community-based programs serving the elderly. There are local Councils on Aging (COA) within the Consortium which provide elders and families with direct care services. The thirty communities are also serviced by Area Agencies on Aging, which are designated as 'Aging Services Access Points'. Programs implemented to meet the needs of elderly residents include subsidized housing; protective services (intervention in cases where there is evidence that an elder has been neglected, abused or financially exploited by someone in a domestic setting); home care; congregate housing; nutrition; guardianship; legal services; transportation; assistance with health care administration; and coordination services for the disabled elderly.

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

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

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

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

Housing Opportunities for People with AIDS

*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.

Action Plan HOPWA response:

Not Applicable. The Consortium does not receive HOPWA funds.

Specific HOPWA Objectives

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

Specific HOPWA Objectives response:

Not Applicable. The Consortium does not receive HOPWA funds.

Other Narrative

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

No additional material is included here.

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

1. INTRODUCTION

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

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

2. CITIZEN PARTICIPATION PROCEDURES

A. Notification of Public Meetings and Hearings

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

- Advertisements or notices will be placed in the major newspapers serving the region at least 14 days in advance of a public hearing or meeting.
- Advertisements or notices will be placed on the City of Peabody Website at least 14 days in advance of a public hearing or meeting.
- Advertisements or notices will be placed in all ethnic and minority newspapers that serve a Consortium community or communities.
- A press release will be sent to all major press outlets serving the Consortium.
- The City and Consortium will maintain and update an e-mail list of interested citizens and organizations. Notices will be sent to those on the list as well as any individual and organization requesting to be included on the list.

- Included in the above list for notices will be all certified community development housing organizations, community action agencies, local and regional housing authorities, area agencies on aging, and those agencies serving persons with disabilities located in or serving the Consortium area.

B. Location and Format of Public Meetings and Hearings

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

- For the City of Peabody, at least two (2) public meetings and hearings will be held, and for the Consortium, at least three (3) public meetings and hearings will be held to ensure coverage of all geographical regions of the Consortium. The regional location for public meetings and hearings must include at a minimum the Merrimack Valley, Cape Ann, and Southern Essex County.
- All meeting locations will be accessible to people with disabilities. If an individual requires special services, the City and the Consortium will make a good faith effort to make the necessary arrangements to accommodate that person, as long as reasonable advance notice is given.
- Every effort will be made to locate meetings in places that are accessible by public transportation.
- At least one public meeting and at least one public hearing will be held in the evening to ensure that low and moderate income working persons can participate.
- Local communities or non-profit and community groups may be asked to co-sponsor meetings and hearings so that citizens see the partnerships that exist between the Consortium, member communities, and nonprofit organizations.
- The City and the Consortium will make a good faith effort to coordinate with the community co-sponsor to provide childcare services during the meeting or hearing.
- With reasonable advanced notice, translators will be provided for citizens who do not speak English or who require sign-language translation.

C. Availability of Documents

- The City and the Consortium will make information pertaining to the Consolidated Plan process available to any citizen within three (3) working days.
- The draft version of the Consolidated Plans, Action Plans, CAPER's, substantial amendments and related documents will be sent to non-profit and community groups that represent and advocate for low-income people. At a minimum, these community groups include certified community development housing organizations, housing authorities, community action agencies, area agencies on aging, and those agencies serving persons with disabilities located in or serving the City/Consortium area
- The draft version of the Consortium's Consolidated Plan, Action Plans, CAPERs, substantial amendments and related documents will be sent to the Community Development Departments of each member communities and will be available for

the purpose of public inspection.

- The draft version of the Consolidated Plans, Action Plans, CAPERs, substantial amendments and related documents will be made available on the City of Peabody's Website.
- A written summary of all meetings and hearings relating to the Consolidated Planning process will be prepared and made available to citizens. The input provided at meetings and hearings will be reviewed and, as deemed appropriate, will be incorporated into the Consolidated Plan and Action Plans.

D. Citizen Participation Opportunities

Stage 1: Development of the Citizen Participation Plan

- Every five years, the City of Peabody and the North Shore HOME Consortium will evaluate its Citizen Participation Plan and re-submit it with the Consolidated Plan.
- When deemed appropriate by the City and the Consortium, a steering committee comprised of government staff, non-profit staff and community leaders will facilitate the process of reviewing and recommending changes to the Citizen Participation Plan.
- The Draft Citizen Participation Plan will be available for general comments for at least 30 days.
- The updated Citizen Participation Plan will be published as part of the final Consolidated Plan.

Stage 2: Needs Assessment

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

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

Draft Document Availability:

- At least 31 days before a final Plan is approved, the City and the Consortium will notify citizens that a Draft of the Consolidated or Annual Action Plans are available. This notice will be e-mailed to all member communities and area non-profit agencies, published in area newspapers and on the web on the City of Peabody Website, and will give citizens a reasonable amount of time to review and comment on the Draft Plan.
- The Draft Plan will contain all sections required by HUD, including an estimate of how much funding the City and the Consortium expect to receive, priority tables, and an account of all proposed uses of expected funding (type of activity and amount of allocated funds).
- The Draft Plans and summaries of the Draft Plans will be provided to the public within three (3) working days of request.
- Written suggestions will be encouraged from citizens. All written suggestions on the Consortium's Plans are to be sent to the Director of the North Shore HOME Consortium, and on the City of Peabody's Plans to the Assistant Director of Community Development, at Peabody City Hall, 24 Lowell Street, Peabody, MA 01960.

Public Hearings:

At two (2) public hearings were held, at the same neighborhoods where the first need assessment meetings were held, to obtain public reaction to the Draft Plan. These hearings took place at least 15 days before the final Consolidated Plan or Action Plan is submitted to HUD.

The timing of the hearings was conducted to allow the public enough time to read the Draft Plan before the public hearing and to give government officials enough time to carefully consider public verbal and written comments and incorporate them into the final Plan.

Stage 4: Final Consolidated Plan and Action Plan

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

Stage 5: Amendments to the Consolidated Plan and Action Plan

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

amendment along with a summary of the suggestions and comments not accepted and an explanation for their rejection.

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

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

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

E. Written Complaints and Concerns

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

Attachment B

Community Meeting and Public Hearing Minutes

Community Meeting on February 28th, 2013 at 11:00a.m. – Haverhill City Hall, Room 308 Concerning the Use of HOME Funds

The meeting was convened at 11:05 A.M. in Room 308 at Haverhill City Hall. In attendance were Mr. John Ratka, the Executive Director of the Veterans Northeast Outreach Center, Inc.; Mr. Andrew Herlihy, the Division Director, and Mr. Mathew Hennigan, Housing Coordinator for the City of Haverhill's Community Development Department; Mr. Enrique Tamayo, Project Manager for Harborlight Community Partners, Ms. Madeline Nash, Director of Real Estate for Coalition for a Better Acre, Mr. William Grogan for the Planning Office of Urban Affairs, Ms. Lisa Greene, the Grants Manager for the North Shore HOME Consortium; and Mr. Kevin Hurley, the Director of the North Shore HOME Consortium.

Mr. Hurley thanked those in attendance for coming to the meeting and explained that the purpose of the meeting was to elicit public comments on the housing needs within the Consortium's jurisdiction. He elaborated that these comments were to be used in determining the spending priorities for the HOME funds anticipated during the upcoming program year (beginning on July 1st) and that those comments would be included in the Consortium's One-Year Action Plan for submission to HUD.

Mr. Ratka opened the discussion by stating that affordable housing is the greatest need in the region. He stated that the VASH vouchers that have been made available by HUD have helped his population a great deal, but that for others who are not eligible for these specific for veteran's only vouchers, there is a huge need for decent, affordable, safe housing.

Ms. Nash stated that it is sensible to support the development of affordable rental housing over ownership since the state of Massachusetts will not currently support the development of affordable homeownership units. She said that since the allocation of HOME funds is limited, most developers will be using HOME funds to leverage the larger state funding that is available, so the trend will continue to be toward rental. She said that HOME funds are a great gap filler and a way to show the state that there is local support for the project, a requirement for state funding. She also stated that she has seen a huge need for affordable rental housing, as shown by the hundreds of applications for every unit that her organization creates and markets. She added that of the 425 units that her agency owns and manages, there are currently 0 vacancies. She has observed that vacancy rates are extremely low everywhere in our region right now, and when this occurs, market rate landlords are able to raise rents, making it even more difficult for low income households to find affordable places to live.

Mr. Ratka agreed with Ms. Nash that the local support is very important for developers. He also agreed that he is having a difficult time finding decent

affordable rental units for his clients with VASH vouchers. He stated that the affordable units that he finds advertised are often in very poor condition and he refuses to allow his clients to rent anything that is substandard. Ms. Nash agreed that safe, well managed affordable market rate housing is in short supply, but that communities need to think strategically for their future viability and look for ways to encourage the development of both affordable and market rate housing.

Mr. Herlihy added that the City of Haverhill, which was designated a Gateway City, is looking to access the Gateway Cities Housing Programs which support the development of market rate housing. He sees this as a way to bring in more people, those with disposable income, to help support the local economy.

Ms. Nash replied that a community has to think about what will happen to the people who already live there when the market rate housing is brought in, and that we can't turn our backs on those folks either.

Mr. Herlihy commented that the Consortium is made up of such a diverse group of communities, that planning across the region must be difficult since different sized communities must each have different techniques for planning in their communities.

Mr. Hurley stated that the Consortium can only fund affordable housing development, and some who hear the term affordable housing do not realize what the term really means, that these households are our neighbors. He added that a need exists for education on this issue.

Mr. Tamayo suggested that it may be time to look at some other housing options, possibly what has worked in the past. For example, renovating a three-floor Victorian house to create dormitory style housing, mixing family types, so that some seniors would share the housing with families, with the possibility of the seniors providing child care.

Mr. Ratka said that his SRO programs work for many of his clients, and in some cases clients in apartments ask to move back to the SRO units as the apartment may be more than they are able to maintain.

Ms. Nash asked to add her appreciation that the Consortium continues to prioritize developments created by CHDO developers. She feels that it gives a leg up to the smaller local non-profit developer who is competing with much larger, better funded for-profit developers.

Mr. Grogan entered the meeting a short time after the discussions began, having attended another meeting in the same building at the same time. He stated that he is grateful for the support of the Consortium in their developments, including the Hayes Building and the Cordovan Building projects in Haverhill and the St. Joseph's development in Salem, and the upcoming Winter Street project. His organization is trying to create integrated housing, mixing low, very low and market rate housing, and he thinks they have been very successful in this model. He said that the St.

Joseph's project will be completed in November. The Winter street project, if funded, will be completed in 2014.

Mr. Herlihy stated that since his local housing authority does not want to add any housing units to their inventory, the HOME funds have made it possible for the City of Haverhill to add new affordable units to their subsidized housing inventory. He added that in the past they have supported the renovation of several group homes with HOME funds, but going forward will be spending HOME funds on projects such as Habitat for Humanity affordable ownership units and other small infill projects. The City has recently re-energized its relationship with Habitat for Humanity, and since their mayor has expressed concern for the low percentage of owner occupied units in the community, this is a good fit to help toward that end. Mr. Herlihy added that his mayor has personally taken up the issue of abandonment and neglected buildings, and hopes to turn these around to provide some new affordable ownership units to give some low income households a chance to have a decent place to live.

Ms. Nash added that it only makes sense for a community to be strategic and to target funds to assist distressed neighborhoods.

Mr. Herlihy agreed that this is the goal of the current administration in order to bring these neighborhoods back to their former state. He informed the group that the Cogswell building in Haverhill is going out to RFP, and that they have awarded \$140,000 in HOME funds to the YMCA of the North Shore for 20 units of affordable rental housing at 170 Main Street. He also shared that his community undertook the largest municipal debt of any community in the commonwealth, 86 billion dollars for the Hale Hospital, and are required to make payments on that debt in excess of 7 million dollars each year.

Mr. Ratka returned to the topic of the importance of local match to developments that will be asking for State funding, and said that since there are so few local funding opportunities available to developers, and things are getting more difficult with the most recent set of funding cuts to the HOME program, but the state still requires the local match to show support. He wondered if communities would be willing to write letters of support for projects saying that they can't fund the project due to budget cutbacks, but that they do support the project and would fund it if funds were not cut. Those in the room agreed that this is a good idea.

The meeting was concluded at approximately 12:30 P.M. Ms. Greene and Mr. Hurley thanked those in attendance for their participation. They announced that a DRAFT of the One-Year Action Plan would be released over the next several weeks and stated that public hearings on its contents would be held on April 11th at the same location.

Community Meeting on February 28th, 2013 at 5:00 P.M. Concerning the Use of HOME Funds and the City of Peabody's CDBG Funds

The second Community Meeting was held on Thursday, February 28th, 2013 in the Lower Level Conference Room at Peabody City Hall starting at 5:00 P.M.

Mr. Arthur Gordon of Gordon Realty joined Stacey Bernson, Lisa Greene and Kevin Hurley. He expressed his concern for the number of homeless individuals who are living in places not fit for human habitation in downtown Peabody. These individuals – he estimated a “core group” of about 25 people – are living outdoors. He suggested that, at different times, the number rises to about 40 individuals.

Mr. Gordon has had conversations with a number of these homeless individuals over an extended period. His concern is that these are Peabody residents who are not interested in being relocated to the Lynn Shelter, to the Lifebridge shelter in Salem or to the River House emergency shelter in Beverly. Mr. Gordon commented that Peabody is a city, and, as such, should not ignore this issue; that the cities of Salem, Beverly and Gloucester (each with fewer residents than Peabody) have established emergency shelters to provide services to homeless individuals. He acknowledged that Citizens for Adequate Housing, Inc., based in Peabody, serves homeless families.

During the discussion, he noted that although there is a commonly held perception that these individuals are resistant to accepting any assistance, and that they would not welcome any services, he stated that this is not accurate. Some had expressed a hope that the Mayor would provide some help – indicating that he had made some comments to them during his first campaign that caused them to hope for opportunities. Several of these men are seeking employment, but because of their circumstances they do not present well in an interview setting.

He indicated that there are men of varying ages from 18 (possibly younger) to their late fifties, but because of the stress of living outdoors being not conducive to maintaining good health, many do not survive to an age where they might collect social security and have a stable source of income. Of the number of people living outdoors, at least three of these individuals are women.

Several moments after the meeting started, Ms. Laura MacNeil, the acting Executive Director of NSCAP, joined the meeting. She noted that just about all potential funding to serve this population has diminished or has already been committed to other uses. Mr. Gordon suggested that, in order for this idea to move forward, a group of interested parties should form a working committee to set the agenda for dealing with this issue. Mr. Hurley noted that in two other localities it was communities of faith that initiated action. Mr. Gordon noted that both Nancy Porcaro [of CAH] and Alyse Barbash [of Haven from Hunger] should be invited to participate in the discussions. The Peabody Interfaith Ministry was also suggested.

Written comments received from Derek LePard of NSCAP on HOME TBRA:

Advocacy Department Home Funds – TBRA Narratives:

1) Tina, who has been a long time client of the Advocacy Department, has come a long way since we started working with her in 2010. When we originally began to assist her she was disabled, depressed, facing surgery and behind in her rent. Her income was not sufficient to sustain her expenses, and as a result she had been sporadically homeless, living in her car. Through funding in the Advocacy Department, we were able to provide her with a temporary twelve month housing subsidy beginning in March of 2012. By creating a stable environment for Tina, we gave her time to devote herself to searching for a permanent housing subsidy.

Tina was denied subsidized housing by a local housing authority. NSCAP's advocate and NSCAP's housing law project attorney encouraged her to appeal the denial and coached her on the most effective way to address the questions she would be receiving from the local housing authority. She won the appeal, has cooperated fully with the housing authority, and now has an appointment to receive a Section 8 voucher in February 2013.

Tina now has a secure income from Social Security Disability and will have safe and affordable housing once she moves to a new apartment utilizing her Section 8 voucher. Currently, most applicants wait years for housing subsidies. We are pleased that Tina was able to use our advice and assistance to create a stable environment for herself within a relatively short period of time. We will continue to provide stabilization services as she searches for an apartment and moves to permanent housing in March 2013.

As well, Tina has utilized other NSCAP programs including the Tax Assistance Program and the Fuel Assistance Program. Tina was extremely grateful for all the help NSCAP was able to provide for her over the last few years.

2) In February 2012, NSCAP's Advocacy Department assisted Lisa, a single mother and her daughter who were on the verge of becoming homeless. Lisa was employed full-time as a waitress, but got behind in her rent when her hours were cut at work (slow in winter months, but picks up in summer months). She was struggling to pay her rent arrearage plus her current rent. She had gone to court and had signed an agreement for judgment to vacate. With very little time to resolve this crisis, our NSCAP advocate, who she was working with, was able to negotiate with her landlord. Her landlord agreed to lower the rent and allow her to remain in the apartment with a new one-year lease, as NSCAP would subsidize her rent for one year to prevent her and her daughter's homelessness. Through NSCAP's Home TBRA program we were able to stabilize her tenancy by providing a twelve month rental assistance subsidy. Lisa will receive case management and stabilization services to assist with budgeting and other issues as part of this program. Preventing homelessness for Lisa and her daughter and providing them with affordable housing during this very difficult time of transition, has given them the stability they needed to move forward positively in their lives.

3) Dan is a single father who was homeless and unemployed, receiving unemployment income. He was working to be reunified with his children, who have been staying with his sister. He has been involved with the Department of Children and Families (DCF) and their reunification program. He was recently awarded a Section 8 subsidy, and contacted NSCAP for assistance with a security deposit to move into an apartment. He will get custody of his children back when he moves into an apartment. Through our TBRA Home funds we were able to assist with his security deposit totaling \$1325 and help this family become reunified and housed. Our ability to aid this family has made a huge difference for them all.

Minutes from the two Public Hearings will be attached here.

North Shore Home Consortium

