

FY21 (FFY20) ANNUAL ACTION PLAN

FOR THE
CITY OF NEWTON
HOUSING AND COMMUNITY DEVELOPMENT PROGRAM
AND THE
WESTMETRO HOME CONSORTIUM

JULY 1, 2020 – JUNE 30, 2021

For submission to the Department of Housing and Urban Development

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Executive Summary

AP-05 Executive Summary - 91.200(c), 91.220(b)

1. Introduce and summarize the objectives and outcomes identified in the Plan

The City of Newton and WestMetro HOME Consortium are required by the U.S. Department of Housing and Urban Development (HUD) to submit an Annual Action Plan which describes the anticipated uses of Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG) funds received by the City for the fiscal year ahead. The overall goal of these three programs is to develop viable urban communities through the provision of decent housing, a suitable living environment, and the expansion of economic opportunities for low- and moderate-income persons. Recommendations are based on a five-year strategy captured in the FY21-FY25 Consolidated Plan, which is the result of data analysis and citizen-driven planning processes.

The City of Newton and WestMetro HOME Consortium presents the FY21 (FFY20) Annual Action Plan, detailing the allocation of CDBG, HOME, and ESG funds for the period of July 1, 2020 through June 30, 2021.

FY21 (FFY20) FEDERAL FUNDING AMOUNTS

Community Development Block Grant (CDBG)	\$1,931,323.00
HOME Investment Partnerships Program (HOME)	\$1,480,032.00
Emergency Solutions Grant (ESG)	\$167,734.00
Total	\$3,579,089.00

COMMUNITY DEVELOPMENT BLOCK GRANT

Based on the priorities, needs and goals identified in the FY21-25 Consolidated Plan, the City of Newton has allocated FY21 (FFY20) CDBG funds into four general categories:

- Affordable Housing (\$1,158,800.40 or 60% of CDBG funding)
- Human Services (\$289,698 or 15% of CDBG funding)
- Architectural Access (\$96,560 or 5% of CDBG funding)
- Program Administration (\$386,265 or 20% of CDBG funding)

It is important to note that these percentage allocations are a result of a local, community-driven process. HUD does not mandate these percentages, but rather puts a cap on the amount of funds that can be allocated towards Human Services / Public Services (15%) and Program Administration (20%).

Fair Housing

In addition to the categories mentioned above, Fair Housing will continue to be a focus for the City of Newton and WestMetro HOME Consortium. Continued education around fair housing laws, regulations and their enforcement are critical to ensure every person has equal opportunity and access to affordable housing in Newton. In FY21, the Consortium will finalize its updated Analysis of Impediments to Fair Housing report and will begin to implement recommended actions.

Affordable Housing

Approximately 60 percent of FY21 CDBG funding (\$1,158,800.40) plus \$65,000 in estimated FY21 (FFY20) program income, for a total of \$1,223,800.40, will be allocated towards affordable housing projects identified during the program year. This funding will be used to facilitate:

- The production of new affordable units through site acquisition and improvements,
- The rehabilitation of existing housing units for low- and moderate-income households,
- The preservation of existing affordable units,
- The support of affordable homeownership for low- and moderate-income households, and
- Housing program delivery

In February 2020 (FFY19), the Newton Housing Authority received funding approval from the City's Planning & Development Board and Community Preservation Committee to acquire and preserve the CAN-DO affordable housing portfolio of 33 units across 12 scattered sites in Newton. The City's Planning & Development Board voted to approve \$1,200,000 of CDBG funds to support the acquisition and rehabilitation of the portfolio. As the CDBG funding is pulling from FY19, FY20, and FY21 dollars, the Planning and Development Board approved a substantial amendment to the FY19 and FY20 Annual Action Plans and FY16-FY20 Consolidated Plan, as well as a conditional pre-commitment of \$82,415.82 of FY21 funds via the City's Housing Rehabilitation Program.

Human Services / Public Services

HUD caps the human service allocation at 15 percent of the City's total annual CDBG grant. As a result, \$289,698 plus an estimated \$15,000 in program income, for a total of \$304,698 will be made available for the FY21 Human Service program.

The FY21 (FFY20) Human Service Request for Proposals (RFP) was released on January 6, 2020, and proposals were evaluated by a review committee comprised of representatives from the Department of Planning and Development and the Department of Health and Human Services. Subsequently, the review committee consulted with two representatives of the Planning and Development Board. Proposals were ranked on March 2, 2020 based on their alignment and consistency with the City's three priority areas:

- Enrichment and Care for Vulnerable Youth, Ages 0-18
- Stability and Self-Sufficiency for Vulnerable Adults, Ages 19-61

- Promoting Economic Security and Vitality for Older Adults, Ages 62+

In addition to the priority areas, the review committee took into consideration the program’s past performance, target population, and the most pressing needs in the community, which were identified in the FY21-FY25 Consolidated Plan.

The City received fifteen proposals, thirteen of which will be awarded Human Service grants during the FY21 (FFY20) program year, following the recommendation of the Human Service RFP Review Committee. The selected programs will directly benefit low- to moderate-income Newton residents and will provide a critical network of supports to assist in stabilizing vulnerable individuals and families across the lifespan.

FY21 Human Service Program Allocations				
Agency	Program	FY21 Award	FY20 Awards	% Change
Riverside Community Care	Mental Health Services Promoting Self-Sufficiency	\$50,000.00	\$40,000.00	20%
Family ACCESS	Social Mobility for Young Families	\$48,000.00	\$48,000.00	0%
The Second Step	Community Programs for Adult Survivors of Domestic Violence	\$35,000.00	\$35,000.00	0%
Newton Housing Authority	Resident Services Program	\$33,410.00	\$23,000.00	31%
Newton Community Development Foundation	Resident Services Program	\$31,000.00	\$28,000.00	10%
John M. Barry Boys & Girls Club of Newton	Financial Aid for Teens and Families	\$17,000.00	\$16,000.00	6%
Jewish Family and Children’s Services	Stabilization and Recovery Services	\$15,408.00	\$12,500.00	19%
2Life Communities (formerly JCHE)	CaringChoices and Wellness Nursing for Low-Income Seniors	\$15,000.00	\$12,500.00	17%

FY21 Human Service Program Allocations (continued)				
Agency	Program	FY21 Award	FY20 Awards	% Change
Barry L. Price Rehabilitation Center	Promoting Successful Life Transition for Adults with Intellectual and Developmental Disabilities	\$15,000.00	\$15,000.00	0%
Plowshares Education Development Center	Tuition Assistance for Pre-School and School-Age Care	\$15,000.00	\$10,000.00	33%
Horace Cousens Industrial Fund	Emergency Grants for Vulnerable Individuals and Families	\$12,000.00	\$12,000.00	0%
REACH Beyond Domestic Violence	Individual Support and Advocacy for Adult Survivors of Domestic Violence	\$11,880.00	\$11,520.00	3%
Society of St. Vincent de Paul*	Housing Emergency Assistance Program	\$6,000.00	N/A	N/A
Economic Mobility Pathways	Career Family Opportunity Program	\$0.00	\$35,000.00	-100%
Newton Dept. of Senior Services	Senior Fitness Program	\$0.00	\$10,000.00	-100%
TOTAL		\$304,698.00	\$308,520.00	-1%

*Society of St. Vincent de Paul is a new applicant this year

Architectural Access

Approximately 5 percentage of CDBG funding (\$96,560) plus \$31,882.33 from prior year's CDBG funds, for a total of \$128,442.33, will be allocated to two access projects. These projects include:

- Phase I of the reconstruction of the Marty Sender Path, connecting The Cove/Auburndale Playground and Lyons Park in Auburndale, and
- The installation of curb cuts city-wide

Program Administration

HUD caps the program administration allocation at 20 percent of the City's total annual CDBG grant. As a result, \$386,264 plus an estimated \$20,000 in program income, for a total of \$406,264, will be allocated for program administration.

HOME INVESTMENT PARTNERSHIP PROGRAM

As the lead entity for the WestMetro HOME Consortium, the City receives and administers HOME funds for the City and twelve other member communities of the WestMetro HOME Consortium – the Towns of Bedford, Belmont, Brookline, Concord, Lexington, Natick, Needham, Sudbury, Watertown, and Wayland and the Cities of Framingham and Waltham. The purpose of the HOME Program is to provide funds for a wide range of housing activities, including developing, acquiring and rehabilitating affordable housing or providing direct rental assistance to create affordable housing opportunities for low- and moderate-income people.

The Consortium anticipates receiving a total of \$1,480,032. As part of HUD's official notice of allocation, the HUD Field Office determines the distribution of funds among each member community of the Consortium. Approximately 70% of HOME funds will be available for HOME programs and projects, 10% will be allocated toward HOME administrative costs, 5% will be allocated for operating expenses of certified Community Housing Development Organizations (CHDOs), and another 15% will be set-aside for housing activities to be undertaken specifically by certified CHDOs. CHDOs are nonprofit, community-based organizations that are certified by HUD and have the capacity to develop affordable housing within the Consortium.

The Consortium will focus on three goals in FY21:

- **Tenant Based Rental Assistance for Rental Housing (TBRA)** Financial support in the form of security deposits and first/last month's rent will be provided to an estimated fifty-seven income eligible households through Tenant Based Rental Assistance programs in Bedford, Framingham, Natick, Waltham and Wayland.
- **Rehabilitation of Existing Units**
HOME funds will be used to rehabilitate three homeowner-occupied housing units in Framingham and two rental units in Waltham.
- **Production of Affordable Units**
Construction of four HOME-assisted rental units will be completed in FY21. Two of these units are part of Phase II of The Coolidge at Sudbury and two are included in Belmont's Bradford Estate project.

EMERGENCY SOLUTIONS GRANT AND MCKINNEY-VENTO FUNDS

The Massachusetts Balance of State (BoS) Continuum of Care (CoC), under the supervision of the Department of Housing and Community Development (DHCD), administers McKinney-Vento funds for the former BNWW CoC. The BNWW CoC, previously led by the City of Newton, merged with the BoS CoC in December of 2016. On January 14, 2020, HUD awarded the BoS CoC a total of \$12,131,412 in FFY19 funds, a 6.25% decrease from the prior year. From that total, the BNWW region received \$1,681,344 for five projects across three sub-grantee agencies, including Advocates, Pine Street Inn, and The Second Step.

Emergency Solutions Grant (ESG) funds are awarded to local providers through a competitive Request for Proposals (RFP), providing shelter operations/services, homelessness prevention,

and rapid re-housing services throughout the Brookline-Newton-Waltham-Watertown (BNWW) region. In addition, local providers may seek ESG funds to support contributing data for the Homeless Management Information System (HMIS) or the implementation of a comparable database for victim service providers.

On December 6, 2019, Division staff consulted with former Brookline-Newton-Waltham-Watertown Continuum of Care (BNWW CoC) housing and social service providers and a representative from the Massachusetts Balance of State Continuum of Care (BoS CoC) to determine FY21 (FFY20) ESG funding priorities across its eligible components, outlined below:

- **Emergency Shelter Services** (\$70,000 or 41.7%): funds support essential services for individuals and families residing in an emergency shelter; shelter operations and costs such as building maintenance, rent, security, fuel, equipment, and furnishings; and renovations for emergency shelters.
- **Homelessness Prevention** (\$56,170.78 or 33.5%): funds support the stabilization and potential relocation, including short-term and medium-term rental assistance, security deposit, rent arrears, and moving costs for individuals and families at immediate risk of homelessness.
- **Rapid Re-housing** (\$23,383.17 or 13.9%): funds support homeless individuals and families to move out of emergency shelters or places not meant for human habitation into permanent housing.
- **Homeless Management Information System (HMIS)** (\$5,600 or 3.3%): funds support the costs associated with establishing and operating a comparable database for domestic violence providers.
- **Program Administration** (\$12,580.05 or 7.5%): funds support Division staff salaries for those managing ESG projects.

On January 6, 2020, the FY21 ESG RFP was released alongside the Human Service RFP and proposals were evaluated by a review committee comprised of representatives from the Department of Planning and Development, Department of Health and Human Services, BoS CoC, and the former BNWW CoC (non-ESG subrecipients). Subsequently, the review committee consulted with two representatives of the Planning and Development Board. Proposals were ranked on March 2, 2020 based on each project's past performance, staff capacity, target population, and the most pressing needs in the region, which were identified in the FY21-25 Consolidated Plan.

The City received eight proposals from five nonprofit agencies and all eight proposals will receive ESG grant during FY21 (FFY20) program year, following the recommendations of the ESG RFP Review Committee.

FY21 ESG Allocations				
Agency	Program	FY21 Recommendations	FY20 Awards	% Change
Emergency Shelter Services				
The Second Step	Transitional DV Shelter Operations	\$21,250.00	\$17,800.00	16%
REACH Beyond Domestic Violence	Emergency DV Shelter Operations	\$21,250.00	\$17,800.00	16%
Community Day Center of Waltham	Day Shelter Operations	\$16,500.00	\$16,800.00	-2%
Middlesex Human Service Agency	Bristol Lodge Men's & Women's Shelters	\$11,000.00	\$13,000.00	-18%
Homelessness Prevention				
Brookline Community Mental Health Center	Homelessness Prevention	\$49,670.78	\$53,500.00	-7%
The Second Step	Homelessness Prevention	\$6,500.00	\$6,500.00	0%
Rapid Re-housing				
Brookline Community Mental Health Center	Rapid Re-housing	\$23,383.17	\$18,450.00	27%
The Second Step*	Rapid-Re-housing	N/A	\$6,132.62	N/A
HMIS				
REACH Beyond Domestic Violence	Comparable HMIS Database	\$5,600.00	N/A	N/A
Program Administration				
City of Newton	Administration	\$12,580.05	\$12,207.38	3%
TOTAL		\$167,734.00	\$162,765.00	3%

2. Evaluation of past performance

Following the close of the fiscal year, the City of Newton submits the Consolidated Annual Performance Evaluation Report (CAPER) to HUD on behalf of the city's CDBG and ESG programs, and the WestMetro HOME Consortium's HOME programs. This report describes, in detail, the expenditures and accomplishments of the prior year, and evaluates the progress the communities made in advancing the priorities identified in that year's Annual Action Plan.

The most recent draft Consolidated Annual Performance and Evaluation Report (CAPER) was posted to the city's website on August 28, 2019. In accordance with the Citizen Participation Plan, the CAPER was presented by Newton staff to the Planning and Development Board at a public hearing. For the FY19 (FFY18) CAPER, this hearing took place before the Planning and Development Board on September 10, 2019. The presentation of the CAPER initiated a 15-day comment period, after which the report was reviewed and certified by the Executive Office and submitted to HUD. The FY19 (FFY18) CAPER was submitted on September 24, 2019. A public notice of the hearing and subsequent comment period was published in all of the Consortium communities' newspapers, and announced in the city's digital Friday Report. The public notice and report was made available on the city's webpage and in the Housing and Community Development Division office ten days in advance of the meeting.

3. Summary of Citizen Participation Process and consultation process

The draft FY21 Annual Action Plan was available for public review on Wednesday 25, 2020, in advance of the virtual public hearing held by the Planning and Development Board on Monday, April 6, 2020. Detailed instructions for public participation in the meeting via ZOOM were included in the city's public hearing notice. The Planning and Development Board voted to adopt the FY21 Annual Action Plan as presented. The comment period ended Wednesday, May 5, 2020. The draft Plan was also presented to the Zoning and Planning (ZAP) Committee of the Newton City Council on Monday, April 13, 2020. The ZAP Committee voted to recommend City Council approval of the FY21 Annual Action Plan, and on April 20th the City Council authorized submission of the plan.

Please see the appendix to review the Citizen Participation Plan. Please also see the consultation and participation sections of this plan.

4. Summary of public comments

The City received comments from four residents of Newton and one resident of Bedford, during the development of the FY21-25 (FFY20-24) Consolidated Plan. Please see the appendix to review the written public comments and responses.

5. Summary of comments or views not accepted and the reasons for not accepting them

All public comments received were accepted.

PR-05 Lead & Responsible Agencies - 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	City of Newton, MA	Housing and Community Development Division
CDBG Administrator	City of Newton, MA	Housing and Community Development Division
HOME Administrator	City of Newton, MA	Housing and Community Development Division
ESG Administrator	City of Newton, MA	Housing and Community Development Division

2. Introductory Narrative

The Housing and Community Development Division (the Division) of the City of Newton's Department of Planning and Development serves as the lead agency responsible for the preparation and implementation of the Five-Year Consolidated Plan and respective Annual Action Plans. In addition to operating as the lead agency for the city's CDBG and ESG consolidated planning process, the Division also serves as the lead entity for the HOME Investment Partnerships Program (HOME) on behalf of the WestMetro HOME Consortium. The Consortium is comprised of the towns of Bedford, Belmont, Brookline, Concord, Lexington, Natick, Needham, Sudbury, Watertown, and Wayland, and the cities of Framingham, Newton and Waltham.

3. Consolidated Plan Public Contact Information

Amanda Berman
Director of Housing & Community Development
Department of Planning and Development
1000 Commonwealth Avenue
Newton, MA 02459
aberman@newtonma.gov
(617) 796-1147

AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

- 1. Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).**

The City of Newton Housing and Community Development Division (the Division) of the Department of Planning and Development works collaboratively with municipalities, city departments, housing providers and advocates, and planning, human service and homelessness agencies throughout the community and region. These joint efforts seek to address community needs, inform investment decisions and ensure the provision of critical services like mental health care, crisis prevention, youth and elderly programming, childcare, family support, affordable housing and employment opportunities for developmentally disabled persons. The Consolidated Planning process, citizen participation and ongoing coordination with the above-mentioned service providers improves communication, leverages resources, reduces duplication and produces more meaningful projects.

- 2. Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

The BNWWCoC, previously led by the City of Newton, merged with the (BoS) CoC in December of 2016. The BoS CoC, under the supervision of the Department of Housing and Community Development, implements the continuum's homelessness strategy across approximately 90 member communities, which includes the recent merge of Somerville-Arlington CoC and Lowell CoC. This encompasses the administration of federal and state resources, submission of the Consolidated Application for McKinney-Vento funds, completion of regional needs assessments, and supervision of projects addressing homelessness assistance and prevention.

During FY20 (FFY19), the BoS CoC collaborated with the City of Newton to facilitate a BNWW area needs assessment to receive feedback from local providers, direct care workers, and constituents regarding housing and homeless needs. The initiative will culminate in a report that will complement ongoing planning efforts. A draft of this report is expected to be released in September 2020.

HUD awarded the BoS CoC a total of \$12,131,412 in FFY19 CoC funding, a 6.25% decrease from the prior year. From that total, the BNWW region received \$1,681,344 for five projects across three sub-grantee agencies, including Advocates, Pine Street Inn, and The Second Step.

The BoS CoC, in coordination with several agencies from former BNWW CoC, completed the 2020 Point-in-Time (PIT) Count on January 24, 2020. Data from the PIT Count is now expected to be released as late as June of 2020.

3. Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The City coordinates with the BoS CoC concerning projects and activities, performance standards, funding priorities, Coordinated Entry, and policies and procedures for the operation and administration of Homeless Management Information System (HMIS) and ESG. Division staff consulted with the former BNWW CoC local providers and BoS CoC representatives on December 6, 2019 to finalize FY21 (FFY20) ESG funding priorities across emergency shelter, homelessness prevention, rapid re-housing, and HMIS components.. ESG funds were not prioritized for street outreach. The Division streamlined planning processes and released the ESG RFP alongside the Human Service RFP, and this year's RFPs were available on January 6, 2020 and due February 3, 2020.

4. Agencies, groups, organizations and others who participated in the process and consultations

Division staff and the Consortium communities consulted with relevant city departments, local and regional organizations, and housing and other social service agencies throughout the development of the FY21-25 Consolidated Plan and the FY21 (FFY20) Annual Action Plan; included in this collaboration were the City of Newton Fair Housing Committee, Newton Housing Partnership, the Commission on Disability, the Housing Authority, and the Balance of State Continuum of Care. Division staff also heard feedback from human service provider and homelessness service provider agencies at the Needs Assessment and Strategic Plan events during the development of the FY21-25 Consolidated Plan, which also informed the FY21 Annual Action Plan.

The draft FY21 Annual Action Plan was available for public review on Wednesday 25, 2020, in advance of the virtual public hearing held by the Planning and Development Board on Monday, April 6, 2020. Detailed instructions for public participation in the meeting via ZOOM were included in the city's public hearing notice. The Planning and Development Board voted to adopt the FY21 Annual Action Plan as presented. The comment period ended Wednesday, May 5, 2020. The draft Plan was also presented to the Zoning and Planning (ZAP) Committee of the Newton City Council on Monday, April 13, 2020. The ZAP Committee voted to recommend City Council approval of the FY21 Annual Action Plan, and on April 20th the City Council authorized submission of the plan.

Please see sheet [AP-10: Consultation](#) at the end of this section.

5. Identify any Agency Types not consulted and provide rationale for not consulting

Staff attempted to contact and consult with all agencies and individuals involved in providing affordable housing units, supportive services, and infrastructure improvements in the City of Newton and throughout the Consortium. No one was purposefully excluded from contributing or commenting on the Annual Action Plan.

Describe other local/regional/state/federal planning efforts considered when preparing the Plan priority

Please see sheet [AP-10: Other Plans Considered](#) at the end of this section.

AP-10: Consultation for the City of Newton and the WestMetro HOME Consortium

Agencies/Groups/Organization Type	Type of Organization	Type of Organization (If serving multiple purposes)	What Section of the Plan was addressed by consultation?	How was the organization consulted?	What are the anticipated outcomes of the consultation or areas for improved coordination?
BEDFORD					
Bedford Housing Authority	Public Housing Authority	Public Housing Authority	Public Housing Needs	The BHA attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals. The BHA also provided direct responses to Public Housing Needs.	Collaboratively develop community-wide housing goals based on community needs for inclusion in the Consolidated Plan and Annual Action Plan.
Bedford Housing Partnership	Other government - Local		Housing Need Assessment	The BHP attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals.	
Bedford Health and Human Services	Other government - Local		Homelessness Strategy	The Town youth and family services community social worker was consulted to provide information regarding social services available to residents experiencing homelessness or at risk for homelessness and/or with other special needs	
Bedford Housing Trust	Other government - Local		Housing Need Assessment	The Trust attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals.	
Bedford Housing Trust	Other government - Local		Housing Need Assessment	The BHT attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals.	
BELMONT					
Belmont Housing Trust	Other government - Local		Housing Need Assessment	The Trust conducted various public meeting comprised of Town Departments, committees, Town Meeting Members, and interested residents to gather input relative to community-wide housing needs and strategic plan goals.	Collaboratively develop community-wide housing goals based on community needs for inclusion in the Consolidated Plan and Annual Action Plan.
Belmont Housing Authority	Other government - Local		Public Housing Needs		
Belmont Council on Aging	Other government - Local		Housing Need Assessment		
BROOKLINE					
Brookline Age Friendly Committee	Housing	Services-Elderly Persons	Housing Need Assessment	Brookline Planning Department staff met with the Brookline Age Friendly Committee on September 10, 2019 to discuss issues and needs of senior citizens concerning affordable housing, homelessness and public services.	A defined view of the high priority needs that seniors face in the community and an understanding of projects that are most important to their well-being.
Brookline Housing Advisory Board	Housing	Housing	Housing Need Assessment	Staff from the Brookline Planning Department attended the Brookline Housing Advisory Board meeting on October 15, 2019.	The anticipated outcome is a better understanding of the housing needs in Brookline
Brookline Commission on Diversity, Inclusion and Community Relation's Fair Housing Subcommittee	Housing	Services-Persons with Disabilities	Housing Need Assessment	Staff from the Brookline Planning Department met with the Brookline Commission on Diversity, Inclusion and Community Relation's Fair Housing Subcommittee on September 23, 2019 to discuss housing, with a focus on fair housing, and other community development needs.	Information to guide the priorities for the Consolidated Plan and strengthen the Town's strategy toward housing and community development needs.
Brookline Center for Mental Health	Housing	Services-homeless	Housing Need Assessment	Staff from the Brookline Planning Department held a one-on-one meeting with staff members from the Brookline Mental Health Center on August 5, 2019 to discuss homelessness, affordable housing, and social service needs in the Town.	A better understanding of affordable housing, homelessness and social services needs which will help guide the development of the Consolidated Plan.
Brookline Council on Aging	Housing	Services-Elderly Persons	Housing Need Assessment	Staff from the Brookline Planning Department held a one-on-one meeting with the Brookline Council on Aging on September 16, 2019. The focus of the meeting was the community development and housing needs of seniors.	A defined view of the high priority needs that seniors face in the community and an understanding of projects that are most important to their well-being.

Agencies/Groups/Organization Type	Type of Organization	Type of Organization (If serving multiple purposes)	What Section of the Plan was addressed by consultation?	How was the organization consulted?	What are the anticipated outcomes of the consultation or areas for improved coordination?
Brookline Community Foundation	Housing	Civic Leaders	Housing Need Assessment	Staff from the Brookline Planning Department held a one-on-one meeting with the Brookline Community Foundation on September 5, 2019 to learn more about the Foundation's programs and gain a further understand of town-wide housing and public service needs.	Improved understanding of the housing and community development needs in Brookline; identification of points of collaboration with other organizations in town.
Pine Street Inn	Housing	Services-homeless	Housing Need Assessment	Staff from the Brookline Planning Department held a one-on-one meeting with staff from Pine Street Inn on September 11, 2019 to discuss affordable housing and service needs for individuals who are very low income and for homeless individuals and families.	An understanding of the existing barriers to create SRO units for formerly homeless individuals and how to improve that process; high priority social services for homeless individuals.
Brookline Improvement Coalition	Housing	Service-Fair Housing	Housing Need Assessment	Staff from the Brookline Planning Department held a one-on-one meeting with members of the board from the Brookline Improvement Coalition.	Improved understanding of affordable housing needs in the Town.
Center Communities	Housing	Services-Elderly Persons	Housing Need Assessment	Staff from the Brookline Planning Department held a one-on-one meeting with staff from Center Communities, a local senior housing affordable housing developer on September 12, 2019.	Improved understanding of housing issues facing seniors, social services needed for seniors, and infrastructure issues in the Town.
Commission on Disability	Housing	Services-Persons with Disabilities	Housing Need Assessment	Staff from the Department of Planning attended a meeting of the Commission on Disability on September 19, 2019.	Improved understanding of the needs of persons with disabilities and how federal funds and local resources can be utilized to meet these needs.
Town of Brookline Department of Health	Other-Government Agency	Health Services	Lead Paint Based Strategy	Staff from the Brookline Planning Department consulted with the Town of Brookline Department of Health to specifically discuss lead-paint issues in the Town of Brookline and also the housing availability, affordability and the needs of town residents.	Additional information to educate the public, especially landlords and tenants to identify lead paint and understand their rights.
Massachusetts Housing Partnership	Housing	Regional organization	Housing Need Assessment	Staff from the Brookline Planning Department held a one-on-one meeting with a representative from the Massachusetts Housing Partnership on September 19, 2019.	Improved understanding of regional housing and community development needs and strategies for addressing these needs on a local and regional level.
Brookline Housing Authority	Public Housing Authority	Service-Fair Housing	Public Housing Needs	Staff from the Brookline Planning Department held a one-on-one meeting with staff from the Brookline Housing Authority.	Improved understanding of the needs of BHA residents and the short-term and long-term methods to address these needs through public services and investments in BHA construction projects.
Comcast	Major Employer		Other (broadband access)	Staff from the Brookline Planning Department held a one-on-one meeting with a government relations representative from Comcast on October 3, 2019.	Improved understanding of broadband access in Brookline, including the Internet Essential Program for low-income residents. The Town will collaborate with Comcast to share information about this program.
RCN Cable	Major Employer		Other (broadband access)	Staff from the Brookline Planning Department contacted a government relations representative from RCN Cable	Improved understanding of broadband access in Brookline. RCN is the Brookline Housing Authority high-speed internet provider.
CONCORD					
Concord Housing Development Corp.	Community Development Financial Institution		Housing Need Assessment	The CHDC attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals.	Collaboratively develop community-wide housing goals based on community needs for inclusion in the Consolidated Plan and Annual Action Plan.
Concord Dept. of Planning and Land Management	Other government - Local		Housing Need Assessment	The DPLM attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals.	
Concord Housing Foundation	Other government - Local		Housing Need Assessment	The Foundation attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals.	

Agencies/Groups/Organization Type	Type of Organization	Type of Organization (If serving multiple purposes)	What Section of the Plan was addressed by consultation?	How was the organization consulted?	What are the anticipated outcomes of the consultation or areas for improved coordination?
Concord Housing Authority	Public Housing Authority	Public Housing Authority	Public Housing Needs	The CHA attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals. The CHA also provided direct responses to Public Housing Needs.	Collaboratively develop community-wide housing goals based on community needs for inclusion in the Consolidated Plan and Annual Action Plan.
Concord Department of Human Services	Other government - Local		Homeless Strategy	The Town community service coordinator was consulted to provide information regarding social services available to residents experiencing homelessness or at risk for homelessness and/or with other special needs.	
Concord Municipal Light Plant	Other (Please specify)	Other government - Local	Other (Please specify)	The CMLP was contacted directly and asked to provide information on programs for low-income residents to access internet service and to assess access across the community.	
Hugh Cargill Trust (Concord)	Other government - Local		Non-Homeless Special Needs	The Committee that assists the Board to process applications for emergency financial resources will be contacted directly to discuss needs addressed by the Trust funds, particularly as related to housing needs.	
FRAMINGHAM					
Framingham Housing Authority	Public Housing Authority	Housing	Public Housing Needs	Interviews	Improved coordination and the inclusion of the organization's input in the Consolidated Plan and Annual Action Plan.
Framingham Council on Aging	Services- Elderly Person	Other government- local	Housing Need Assessment	Interviews	
South Middlesex Opportunity Council, Inc.	Services- Housing , Housing, Services- Children- Services- Persons with Disabilities, Services- Victims of Domestic Violence, Services- Homeless	Regional Organization	Public Housing Needs, Homeless Needs- Chronically Homeless, Homeless Needs- Families with Children, Homelessness Needs- Unaccompanied Youth, Homelessness Strategy, Anti-poverty Strategy	Interviews	
Bay Path Elder Services	Services- Elderly Person	Regional Organization	Housing Need Assessment	Interviews	
MetroWest Center for Independent Living	Services- Persons with Disabilities	N/A	Housing Need Assessment	Interviews	
Framingham Planning Office	Other government- Local	N/A	Housing Need Assessment	Interviews	
Framingham Veteran's Office	Other government- Local	Services- homeless	Homelessness Needs- Veterans	Interviews	
Wayside Community Programs	Housing	Services- Children	Housing Need Assessment	Interviews	
Advocates	Services- Persons with Disabilities	N/A	Housing Need Assessment	Interviews	
MetroWest Legal Services	Other	Services- homeless	Homelessness Strategy	Interviews	
Framingham Disability Commission	Other government- Local	Services- Persons with Disabilities	Housing Need Assessment	Interviews	
Fair Housing Commission	Other government- Local	Other government- Local	Housing Need Assessment	Interviews	
Framingham Assessing Department	Other government- Local	N/A	Housing Need Assessment	Interviews	
Framingham Health Department	Other government- Local	Services- Health	Lead-Based Paint Strategy	Interviews	
City of Framingham- DPW	Other Government- Local	N/A	Non-Homeless Special Needs	Interviews	
Framingham Parks and Recreation	Other Government- Local	N/A	Non-Homeless Special Needs	Interviews	
Framingham Conservation Commission	Other Government- Local	N/A	Non-Homeless Special Needs	Interviews	
Framingham Housing Authority	Public Housing Authority	Public Housing Authority	Public Housing needs	Interviews	
Department of Corrections	Other government- State	N/A	Homeless Needs, Homeless Strategy	Interviews	
MetroWest Medical Center	Services- Health	Regional Organization	Homeless Needs, Homeless Strategy	Interviews	
MetroWest Chamber of Commerce	Regional Organization	N/A	Market Analysis	Interviews	
Downtown Framingham Inc.	Neighborhood Organization		Market Analysis	Interviews	
LEXINGTON					
Lexington Housing Partnership	Other government - Local		Housing Need Assessment	The LHP attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals.	The anticipated outcomes of the consultation are improved coordination and inclusion of the organization's input in the Consolidated Plan and Action Plan.

Agencies/Groups/Organization Type	Type of Organization	Type of Organization (If serving multiple purposes)	What Section of the Plan was addressed by consultation?	How was the organization consulted?	What are the anticipated outcomes of the consultation or areas for improved coordination?
Lexington Human Services	Other government - Local		Homelessness Strategy	The Town social worker was consulted to provide information regarding social services available to residents experiencing homelessness or at risk for homelessness and/or with other special needs	The anticipated outcomes of the consultation are improved coordination and inclusion of the organization's input in the Consolidated Plan and Action Plan.
Lexington Housing Assistance Board (LexHAB)	Other government - Local		Housing Need Assessment	The LexHAB attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals.	
Lexington Housing Authority	Public Housing Authority	Public Housing Authority	Public Housing Needs	The LHA attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals. The LHA provided direct responses to Public Housing Needs.	
NATICK					
Natick Human Service Department	Other government - Local		Housing Need Assessment	Interviews and focus groups	Improved coordination and the inclusion of the organization's input in the Consolidated Plan and Annual Action Plan.
Senior Center	Services - Elderly Persons		Housing Need Assessment		
ADA/504 Coordinator	Services - People with Disabilities		Housing Need Assessment		
Affordable Housing Trust	Housing		Housing Need Assessment		
Family Promise	Housing	Services - homeless	Housing Need Assessment		
Habitat for Humanity	Housing		Housing Need Assessment		
Natick Housing Authority	Public Housing Authority		Housing Need Assessment		
Natick Service Council	Services - employment	Homeless Needs - Families with children	Housing Need Assessment		
Natick Health Department	Other government - Local		Lead-based Paint Strategy		
State Health Dept/ CLPPP	Other government - State		Lead-based Paint Strategy		
MAPC	Regional Organization	Planning organization	Market Analysis; Other (broadband access)		
MBTA	Other government - State		Anti-poverty Strategy		
Natick Housing Authority	Public Housing Authority		Public Housing Needs		
Natick Conservation Commission	Other government - Local		Other (hazard risks)		
Natick Health Service Department	Other government - Local		Homelessness Needs		
Natick Human Service Department	Other government - Local		Homelessness Needs		
Natick Veteran's Agent	Other government - Local		Homelessness Needs - Veterans		
Natick Police Department	Other government - Local		Homeless Needs - Chronically homeless		
Family Promise	Housing	Services-homeless	Homeless Needs - Families with children		
Natick Services Council	Services - employment	Homeless Needs - Families with children	Anti-poverty Strategy		
South Middlesex Opportunity Council	Housing	Services-homeless	Homeless Needs - Chronically homeless		
Leonard Morse Hospital	Health Agency	Major Employer	Homelessness Strategy		
Natick Center Associates	Business Leaders		Anti-poverty Strategy		
Amvets Post 79, Natick, MA	Foundation		Homelessness Needs - Veterans		
VFW Post 1274, Natick, MA	Foundation		Homelessness Needs - Veterans		
NEEDHAM					
Needham Public Health and Human Service Department	Services - Health		Housing Need Assessment	Meetings	Approved ADU bylaw and new small repair grant program in addition to improved communication between Town departments.
Needham Senior Center	Services - Elderly persons		Housing Need Assessment	Meetings	
Needham Housing Authority	Public Housing Authority		Housing Need Assessment and Housing Strategy	Meetings	Improved coordination in exchanging information between the Town and NHA; coordinated work in managing resales of affordable units; provision of funding; technical support for redevelopment and new development activities.

Agencies/Groups/Organization Type	Type of Organization	Type of Organization (If serving multiple purposes)	What Section of the Plan was addressed by consultation?	How was the organization consulted?	What are the anticipated outcomes of the consultation or areas for improved coordination?
NEWTON					
2Life Communities, formerly known as Jewish Community Housing for the Elderly	Housing	Services-Elderly Persons	Non-Homeless Special Needs	2Life Communities attended the human service brown bag session, a focus group with other housing and social service providers, to express the pressing needs of the extremely-low and low-income elderly population living in Newton.	The anticipated outcomes include improved coordination with the organization and the inclusion of its pertinent input in the Consolidated Plan and Annual Action Plan.
Brookline Community Mental Health Agency	Services-homeless		Homeless Needs - Chronically homeless	Brookline Community Mental Health Center (BCMHC) attended the BoS CoC needs assessment meeting and ESG brown bag session, a focus group among housing and social service providers, to express the pressing needs of the homeless population in the Brookline, Newton, Waltham, and Watertown region.	
Citizens for Affordable Housing in Newton Development Organization (CAN-DO)	Housing		Housing Need Assessment	Acting Executive Director attended the Community Needs Assessment Meeting to provide input on the housing needs of low-income individuals and families in Newton and the WestMetro region.	
Community Day Center of Waltham	Services-homeless		Homeless Needs - Chronically homeless	Community Day Center of Waltham (CDCW) attended the BoS CoC needs assessment meeting and ESG brown bag session, a focus group among housing and social service providers, to express the pressing needs of the homeless population in the Brookline, Newton, Waltham, and Watertown region.	
Economic Mobility Pathways	Services-Employment		Non-Homeless Special Needs	Economic Mobility Pathways (EMPath) attended the human service brown bag session, a focus group comprised of housing and social service providers, to express the pressing needs of the low- to moderate-income individuals and families living in Newton.	
Family ACCESS of Newton	Services-Children		Non-Homeless Special Needs	Family ACCESS attended the community needs assessment meeting and human service brown bag session, a focus group comprised of housing and social service providers, to express the pressing needs of the low- to moderate-income individuals and families living in Newton.	
Horace Cousens Industrial Fund	Services-homeless		Housing Need Assessment	The Horace Cousens Industrial Fund had a one-on-one consultation with Division staff and attended the community needs assessment meeting to express the housing needs of the low- to moderate-income individuals and families living in Newton.	
Jewish Family and Children's Services	Services-Children		Non-Homeless Special Needs	Jewish Family & Children's Services (JF&CS) attended the human service brown bag session, a focus group comprised of housing and social service providers, to express the pressing needs of the low- to moderate-income individuals and families living in Newton.	
John M Barry Boys & Girls Club	Services-Children		Non-Homeless Special Needs	The Boys and Girls Club attended the community needs assessment meeting and human service brown bag session, a focus group comprised of housing and social service providers, to express the pressing needs of the low- to moderate-income individuals and families living in Newton.	

Agencies/Groups/Organization Type	Type of Organization	Type of Organization (If serving multiple purposes)	What Section of the Plan was addressed by consultation?	How was the organization consulted?	What are the anticipated outcomes of the consultation or areas for improved coordination?
Massachusetts Balance of State Continuum of Care	Other government - State	Housing	Homelessness Strategy	The Balance of State Continuum of Care (BoS CoC) and Division partnered to host needs assessment meetings to gather input among housing and social service providers as it relates to the homeless and at-risk of homeless population. The BoS CoC also attended a one-on-one consultation session with the Division to coordinate with the ESG program.	The anticipated outcomes include improved coordination with the organization and the inclusion of its pertinent input in the Consolidated Plan and Annual Action Plan.
Metropolitan Area Planning Council (MAPC)	Planning organization		Housing Need Assessment	Staff solicited comments from MAPC on the draft Consolidated Plan.	
Middlesex Human Service Agency	Services-homeless		Homeless Needs - Chronically homeless	Middlesex Human Service Agency (MHSA) attended the BoS CoC needs assessment meeting and ESG brown bag session, a focus group among housing and social service providers, to express the pressing needs of the homeless population in the Brookline, Newton, Waltham, and Watertown region.	
Newton Commission on Disability	Services-Persons with Disabilities		Non-Homeless Special Needs	The Commission on Disability (COD) attended a community needs assessment meeting to offer ideas for architectural access projects that the Division can undertake in the next five years. The Division also attended the COD's monthly-scheduled meeting to follow-up on these project ideas and to gather additional information on the needs of individuals with disabilities.	
Newton Community Development Foundation	Services-Elderly Persons	Services-Children	Non-Homeless Special Needs	Newton Community Development Foundation (NCDF) attended the community needs assessment meeting and human service brown bag session, a focus group comprised of housing and social service providers, to express the pressing needs of the low- to moderate-income individuals and families living in Newton.	
Newton Department of Health and Human Service	Other government - Local	Services-Health	Non-Homeless Special Needs	The Department of Health and Human Services (HHS) attended a one-on-one consultation meeting with Division staff to discuss housing and social service needs within the Newton community. The HHS is an active member of the Human Service and ESG RFP review committee and works closely with the City's Human Service and ESG subrecipients to refer low- and moderate-income individuals and families for additional resources.	The anticipated outcomes include obtaining pertinent input to strengthen the City's Human Service and ESG programs and to ensure all available resources are made accessible for all low- to moderate-income individuals and families.
Newton Department of Public Works	Other government - Local		Non-Homeless Special Needs	The Department of Public Works attended a special focus group comprised of other city departments to offer input about architectural access barriers in the community and the impact on people with disabilities and elderly population.	The anticipated outcomes include improved coordination with the organization and the inclusion of its pertinent input in the Consolidated Plan and Annual Action Plan.
Newton Department of Public Buildings	Other government - Local		Non-Homeless Special Needs	The Department of Public Buildings attended a special focus group comprised of other city departments to offer input about architectural access barriers in the community and the impact on people with disabilities and elderly population.	
Newton Department of Senior Services	Other government - Local	Services-Elderly Persons	Non-Homeless Special Needs	The Department of Senior Services attended a special needs focus group comprised of other city departments to offer input relative to the growing elderly population living in Newton as well as people with disabilities.	

Agencies/Groups/Organization Type	Type of Organization	Type of Organization (If serving multiple purposes)	What Section of the Plan was addressed by consultation?	How was the organization consulted?	What are the anticipated outcomes of the consultation or areas for improved coordination?
Newton Fair Housing Committee	Housing	Service-Fair Housing	Housing Need Assessment	Staff presented an overview of the Consolidated Planning process and conducted a needs assessment discussion at a Fair Housing Committee meeting in the Fall 2019. Members of the Committee attended the Community Needs Assessment Meeting to provide their input specifically related to Newton's affordable housing and fair housing needs. Staff attends the monthly committee meetings, where needs of the community are a regular point of discussion.	The anticipated outcomes include improved coordination with the organization and the inclusion of its pertinent input in the Consolidated Plan and Annual Action Plan.
Newton Housing Authority	Public Housing Authority	Services-Elderly Persons	Housing Need Assessment	The Newton Housing Authority (NHA) attended the community needs assessment meeting and human service brown bag session, a focus group comprised of housing and social service providers, to express the pressing needs of the low- to moderate-income elderly and families living in Newton. The NHA also assisted the Division in completing sections of the FY21-25 Consolidated Plan.	The anticipated outcomes include continued collaboration to ensure Newton is creating as many affordable housing opportunities as possible.
Newton Housing Partnership	Housing		Housing Need Assessment	Staff presented an overview of the Consolidated Planning process at a Newton Housing Partnership meeting in the Fall 2019. Members of the Partnership attended the Community Needs Assessment Meeting to provide their input specifically related to Newton's affordable housing needs. Staff attends the monthly Partnership meetings, where needs of the community are a regular point of discussion.	
Newton Planning and Development Board	Housing		Housing Need Assessment	Staff presented an overview of the Consolidated Planning process at a Planning & Development Board meeting in the Fall 2019. On February 3, 2020 the draft FY21-25 Consolidated Plan was presented to the Board. The updated Consolidated Plan and draft FY21 Annual Action Plan was presented to the Board on April 6, 2020. Staff regularly attends the monthly Planning and Development Board meetings, where needs of the community are a regular point of discussion.	
Metro West Collaborative Development	Housing		Housing Need Assessment	Metro West staff attended the Community Needs Assessment Meeting to provide input on the housing needs of low-income individuals and families in Newton and the WestMetro region.	The anticipated outcomes include improved coordination with the organization and the inclusion of its pertinent input in the Consolidated Plan and Annual Action Plan.
Pine Street Inn	Housing	Services-homeless	Homeless Needs - Chronically homeless	Pine Street Inn attended the ESG brown bag session, a focus group among housing and social service providers, to express the pressing needs of the homeless population in the Brookline, Newton, Waltham, and Watertown region.	
REACH Beyond Domestic Violence	Services-Victims of Domestic Violence		Homeless Needs - Families with children	REACH Beyond Domestic Violence had a one-on-one consultation with Divison staff and attended the human service brown bag session, a focus group comprised of housing and social service providers, to express the pressing needs of survivors of domestic violence and their families living in Newton and the surrounding communities.	

Agencies/Groups/Organization Type	Type of Organization	Type of Organization (If serving multiple purposes)	What Section of the Plan was addressed by consultation?	How was the organization consulted?	What are the anticipated outcomes of the consultation or areas for improved coordination?
Riverside Community Care	Services-Persons with Disabilities		Non-Homeless Special Needs	Riverside Community Care attended a community needs assessment meeting to offer input on the needs of low- to moderate-income individuals and families as they relate to housing, human services, and homelessness.	The anticipated outcomes include improved coordination with the organization and the inclusion of its pertinent input in the Consolidated Plan and Annual Action Plan.
The Second Step	Services-Victims of Domestic Violence		Homeless Needs - Families with children	The Second Step had a one-on-one consultation with Division staff and attended the human service brown bag session, a focus group comprised of housing and social service providers, to express the pressing needs of survivors of domestic violence and their families living in Newton and the surrounding communities.	
United Citizens for Housing Affordability in Newton (U-CHAN)	Housing		Housing Need Assessment	Staff met with U-CHAN representatives, who provided their input on the needs of Newton's low-income population, particularly relating to housing. U-CHAN surveyed low-income Newton residents in 2019 and provided staff with survey results to inform the Consolidated Plan Needs Assessment.	
SUDBURY					
Sudbury Housing Trust	Other government - Local		Housing Need Assessment	The SHT attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals	Improved coordination and inclusion of the organization's input in the Consolidated Plan and Action Plan.
Sudbury Housing Authority	Public Housing Authority	Public Housing Authority	Public Housing Needs	The SHA attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals. The SHA also provided direct responses to Public Housing Needs.	
Sudbury Health Department Social Worker	Other government - Local		Non-Homeless Special Needs	The social worker was consulted to provide information regarding social services available to residents experiencing homelessness or at risk for homelessness and/or with other special needs	
HOPE Sudbury	Other government - Local		Non-Homeless Special Needs	The organization provides short-term financial assistance to families with emergency assists, and was contacted directly to discuss needs addressed by the Trust funds, particularly as related to housing needs.	
WALTHAM					
Waltham Affordable Housing Trust	Housing	Other Govt. Local	Housing Needs Assessment	Housing Department staff attend quarterly meetings to provide information on emergency housing needs of city residents and data on the number of residents applying for emergency funding to prevent eviction.	A Housing Trust fund allocation to the emergency assistance program to address the needs of the near-homeless.
Waltham Council on Aging	Services - Elderly	Other Govt. Local	Non-homeless special needs	Council on Aging hosted a series of workshops for the elder community on housing resources, including financial housing assistance.	A senior community that is equipped with knowledge about the available financial resources to age in their home.
Waltham Public Schools	Services - Children	Services - Education	Homeless needs-families with children	Through monthly meetings with the Waltham Homeless Coalition, the Waltham High School McKinney Vento Liaison provides information on number of Waltham homeless families, their housing situations, runaways and overall needs of this population.	Homeless children and youth remain enrolled and have an equal opportunity to succeed in school.
Waltham Housing Authority	Housing	Public Housing Authority	Housing Needs Assessment	Tenant meeting at WHA's Beaverbrook Elderly Housing complex hosted by the Mayor's Office, the Waltham Housing Department, Waltham Housing Authority, city councillors and state representatives to discuss tenant needs in the development.	Allocation of funds for safety and ADA improvements at WHA's Beaverbrook Housing complex.
REACH	Services - Domestic Violence	Services - Domestic Violence	Homeless needs-families with children	Meeting regarding residents of Waltham Battered Womens Shelter and the REACH Board for discussion on programs that could assist women and families being sheltered.	Additional outreach for REACH residents who have transitioned out of shelter housing with TBRA rental assistance.

Agencies/Groups/Organization Type	Type of Organization	Type of Organization (If serving multiple purposes)	What Section of the Plan was addressed by consultation?	How was the organization consulted?	What are the anticipated outcomes of the consultation or areas for improved coordination?
Waltham Homeless Coalition	Services - Homeless		Homelessness Strategy	Monthly meetings held by the Waltham Police	Improved coordination between the City and social service agencies that assist the homeless, by sharing resources and information regarding known homeless people in the City and providing referrals to these individuals.
Massachusetts Housing & Shelter Alliance	Services - Homeless		Homeless needs- Chronically Homeless	The Housing Department attended a Focus Group hosted by DHCD : "Reconvening the Needs Assessment Process".	Improved coordination between local service agencies, city officials and government entities creating policy, addressing affordable homeownership, senior housing and special needs in our community, addressing affordability challenges.
Community Day Center	Services - Homeless		Homelessness Strategy	Monthly meetings with the Waltham Homeless Coalition and daily interaction through referrals to the HOME TBRA program.	Improved access to mainstream services for homeless individuals and families by providing transportation, food programs, shelters, and conducting street outreach.
The Salvation Army	Services - Homeless		Homelessness Strategy	Targeted round table discussions and public meetings with CDBG funding recipients.	Strategies to continue serving households in need of emergency assistance despite limitations on homeless prevention funds.
Waltham Partnership for Youth	Services - Education	Non-Homeless Special Needs	Anti-Poverty Strategy	Targeted round table discussions and public meetings with CDBG funding recipients.	Improved understanding of child poverty rates and housing and nutrition needs associated with families in poverty in the Waltham public school district.
Healthy Waltham, Inc	Health Agency	Non-Homeless Special Needs	Anti-Poverty Strategy	Targeted round table discussions and public meetings with CDBG funding recipients.	Improved understanding of child poverty rates and needs associated with families in poverty in the Waltham public school district.
The Waltham YMCA	Services - Youth	Non-Homeless Special Needs	Anti-Poverty Strategy	Targeted round table discussions and public meetings with CDBG funding recipients.	Improved understanding of the needs of lower income youth in Waltham.
Chesterbrook/Prospect Hill Community Centers	Services - Youth	Non-Homeless Special Needs	Anti-Poverty Strategy	Targeted round table discussions and public meetings with CDBG funding recipients.	Improved understanding of the needs of lower income youth in Waltham.
City of Waltham Health Department	Other Gvt.-Local	Services Health	Lead based Paint Strategy	Quarterly meetings with the Health Department to communicate state reported high lead levels in children under six years old and ongoing code violation notifications to homeowners in the City.	Improved coordination between the Health Department and the Housing Department to better assist residents with rehabilitation loan funds for lead paint abatement and/or rehabilitation funds for health and safety improvements.
Balance of State (BoS) CoC	Other Govt.- State	Services-Homeless	Homeless Needs-Chronically Homeless	DHCD focus group meeting on July 31, 2019 at the Waltham Community Day Center.	Development of a plan to encourage local landlords to utilize the TBRA program for rental units; and a strategy that will assist the placement of homeless individuals that are unable to get emergency placement or priority housing.
WATCH	Community Development Corporation	Services-Homeless	Housing Needs Assessment	Weekly consultation with social worker concerning clients in need	Improved coordination to assist clients with eviction, homelessness, landlord/tenant issues, and access to the appropriate assistance for each household.
City of Waltham Homeless Task Force	Other Govt-Local		Homeless needs-unaccompanied youth	Police in coordination with the Housing Department and the Community Day Center complete the annual Homeless PIT Count.	Accurate data to inform the City's homeless outreach, policies, and programs.
Waltham Committee Inc.	Services-Persons with Disabilities		Non-Homeless-Special needs	Meeting with the Housing Director to discuss improvements to WCI housing and ADA improvements for individuals being served	Allocation of funding resources to improve group home housing in Waltham for disabled individuals.
Newton Wellesley Hospital	Services-Health	Health Agency	Non-Homeless special needs	Multiple meetings/working group of local social service agencies and City of Waltham officials to determine Waltham needs for the City's non-homeless special needs population.	Improved coordination between the City and local health providers

Agencies/Groups/Organization Type	Type of Organization	Type of Organization (If serving multiple purposes)	What Section of the Plan was addressed by consultation?	How was the organization consulted?	What are the anticipated outcomes of the consultation or areas for improved coordination?
WATERTOWN					
Watertown Health Department	Services-Health	Health Agency	Housing Need Assessment; Lead-Based Paint Strategy	Interview with staff; Community Wellness Assessment	The anticipated outcomes of the consultation are improved coordination and the inclusion of the organization's input in the Consolidated Plan and Annual Action Plan.
Watertown Senior Center	Services - Elderly Persons	Other Government Agency	Housing Need Assessment; Non-homeless special needs	Interview with staff; community workshops	
Council Subcommittee on Human Resources	Other Government - Local	Other Government Agency	Housing Need Assessment	Meetings	
ADA/504 Coordinator/Commission on Disability	Services - Persons with Disabilities	Other Government Agency	Housing Need Assessment; Market Analysis	Interview with staff; meetings	
Watertown Housing Partnership	Other Govt-Local		Housing Need Assessment	Meetings	
MetroWest Collaborative Development	Housing	Other - CHDO	Housing Need Assessment	Interview with staff; meetings	
Watertown Housing Authority	Public Housing Authority	Public Housing Authority	Public Housing Needs	Interview with staff; meetings	
Wayside Youth and Family Support Network	Services - Children	Services - children; Services-homeless	Housing Need Assessment	Meetings	
Live Well Watertown	Community Organization	Other Government Agency (Health Department)	Housing Need Assessment	Interview with staff	
MAPC	Planning Organization	Other - government	Housing Needs Assessment; Market Analysis	Meetings	
MBTA	Other Government - State	Public Transportation	Other - Transportation Needs	Interview with staff; meetings	Improved public transit opportunities in Watertown and adjacent communities
Barr Foundation	Other - Foundation	Public Transportation	Other - Transportation Needs	Meetings	
WAYLAND					
Wayland Housing Trust	Other government - Local		Housing Need Assessment	The WHT attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals	The anticipated outcomes of the consultation are improved coordination and inclusion of the organization's input in the Consolidated Plan and Action Plan
Wayland Housing Partnership	Other government - Local		Housing Need Assessment	The WHP attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals	
Wayland Housing Authority	Public Housing Authority	Public Housing Authority	Public Housing Needs	The WHA attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals. The WHA also provided direct responses to Public Housing Needs.	Collaboratively develop community-wide housing goals based on community needs for inclusion in the Consolidated Plan and Annual Action Plan.

AP-10: Other Contributing Plans Considered by the City of Newton and the WestMetro HOME Consortium

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
MAPC Metro Boston 2030 Population and Housing Demand Projections	Metropolitan Area Planning Council	The Strategic Plan adopts many of the priorities and strategies included in these plans.
2015-2020 WestMetro HOME Consortium Regional Fair Housing Plan	WestMetro HOME Consortium	
Massachusetts State Plan to End Youth Homelessness	Massachusetts Executive Office of Health and Human Services	
Subsidized Housing Inventory	DHCD	
FFY19 Annual Action Plan	DHCD	
Balance of State Continuum of Care Collaborative Application	DHCD	
Balance of State Continuum of Care Point-In-Time Count	DHCD	
Balance of State Continuum of Care Housing Inventory Count	DHCD	
American Community Survey (various datasets)	U.S. Census	
Bedford Housing Study, 2019	Town of Bedford	
Bedford Comprehensive Plan, 2013	Town of Bedford	
Belmont Housing Production Plan	Town of Belmont	
Brookline Comprehensive Plan	Town of Brookline	
2016 Housing Production Plan	Town of Brookline	
Brookline Open Space Plan	Town of Brookline	
Town of Brookline Climate Vulnerability Assessment and Action Plan	Metropolitan Area Planning Council	
Strategic Asset Plan	Town of Brookline	
Major Parcels Study	Town of Brookline	
Out of School Time Report	Brookline Community Foundation	
Understanding Brookline: Emerging Trends and Changing Needs	Brookline Community Foundation	
Understanding Brookline: A Report on Poverty	Brookline Community Foundation	
Concord Comprehensive Long Range Plan	Town of Concord	
Concord Housing Production Plan, 2015	Town of Concord	
Hazard Mitigation Plan, 2017 update	Concord, Metropolitan Area Planning Council	
Framingham PHA 5-Year Plan and Annual Plan	Framingham Housing Authority	
Framingham Open Space Plan and Recreation Plan 2013	City of Framingham	
Framingham Housing Plan, Updated 2014	City of Framingham	
Southeast Framingham Neighborhood Action Plan	City of Framingham	
Downtown Framingham TOD Action Plan 2015	City of Framingham	
Lexington Housing Production Plan, 2014	Town of Lexington	
Lexington Comprehensive Plan, 2020	Town of Lexington	
Natick Housing Production Plan 2019	Natick Affordable Housing Trust	
Natick 2030+ Master Plan	Natick Planning Board	
Natick Subsidized Housing Inventory Projections, 2018	Town of Natick	
Natick Open Space Plan, 2012, Updated 2020	Natick Open Space Advisory Committee	
Natick Subsidized Housing Inventory Projections, 2018	Town of Natick	
Previous local housing plans	Town of Needham	
Needham Housing Guidelines	Town of Needham	
Assessment of Housing and Transit Options for Needham Seniors	Town of Needham	
Other HOME reports	Town of Needham	
MAPC Demographic, Economic and Housing Profiles	Town of Needham	
Needham Housing Authority Facilities Master Plan	Needham Housing Authority	
2007 Comprehensive Plan	City of Newton	
2016 Newton Leads 2040 Housing Strategy	City of Newton	
FY2019 Quarter Reports, Emergency Solutions Grant Subrecipients	City of Newton	
City of Newton, Health and Human Services Department, Division of Social Services, FY19 Annual Report	City of Newton	
Newton Department of Public Works, Accelerated Pavement Management Program, 2019 Update	City of Newton	

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Planning for a Livable All Age-Friendly Newton (Draft)	City of Newton	The Strategic Plan adopts many of the priorities and strategies included in these plans.
Living and Aging in Newton: Now and In the Future	City of Newton	
2018 Fair Housing Audit	City of Newton	
Climate Change Vulnerability Assessment and Action Plan, December 2018	City of Newton	
2017 Transition Plan	City of Newton	
Hazard Mitigation Plan, 2019 Update	City of Newton	
Open Space and Recreation Plan, 2014-2020	City of Newton	
Sudbury Master Plan 2020	Town of Sudbury	
Housing Production Plan, 2016	Town of Sudbury	
Hazard Mitigation Plan, 2010	Town of Sudbury	
Basic Housing Needs Assessment for Waltham, MA	Metropolitan Area Planning Council	
Waltham Housing Authority Annual Plan 2018	Waltham Housing Authority	
City of Waltham Transportation Master Plan	Waltham Engineering & Planning Departments	
City of Waltham Open Space & Recreation Plan	Waltham Planning Department	
Watertown Housing Production Plan, 2014	Town of Watertown	
Watertown Comprehensive Plan, 2015	Town of Watertown	
Wayland Housing Production Plan, 2016	Town of Wayland	
Wayland Hazard Mitigation Plan, 2011	Town of Wayland	
Wayland Masterplan Review, 2010	Town of Wayland	

AP-12 Participation - 91.401, 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

During the Consolidated Planning process, Division staff employed a number of methods to solicit citizen and agency input, including three Community Needs Assessment Meetings open to the public; a series of inter-departmental needs assessment sessions including representatives from Health and Human Services, Economic Development, Conservation, Public Works, Senior Services, Engineering, Parks and Recreation, and Transportation; a number of presentations and discussions with city boards and commissions including the Commission on Disability, the Fair Housing Committee, and the Newton Housing Partnership; a series of brown bag lunches / discussions with Newton's Human Service and ESG subrecipients; and other focused meetings and phone calls with other relevant agencies and stakeholders, such the city's Continuum of Care partners at the Balance of State (DHCD).

In an effort to reach a broad base of stakeholders, particularly low- to moderate-income individuals, the three Community Needs Assessment Meetings were held in three locations in different parts of the city, and at various times of the day. The Newton Community Development Foundation (NCDF) and FamilyAccess, both human service subrecipients, hosted the first two meetings. The events were held at Weeks House, NCDF's mixed-income housing development and the gymnasium at FamilyAccess. Many of the participants at the Weeks House event were low-income elderly residents of the site, and the participants at the Family Access event included a number of low- to moderate-income individuals actively engaged in a search for affordable housing in Newton.

Staff also discussed the Annual Action Plan at various boards and commissions meetings throughout January and February, including the following: the Fair Housing Committee; Newton Housing Partnership; Newton Commission on Disability; Uniting Citizens for Housing Affordability in Newton (UCHAN) and local providers of the former Brookline-Newton-Waltham-Watertown Homelessness Continuum of Care. In accordance with HUD guidance and the city's Citizen Participation Plan, a public hearing will be held for a review of the Plan by the city's Planning and Development Board on April 6, 2020. A virtual public hearing will be conducted in place of an in-person meeting due to this closure of Newton City Hall in response to the Coronavirus Disease (COVID-19). Instructions for participating in the hearing via ZOOM were detailed in the city's public notice advertising the hearing. An accessible draft of the document was made available on the city's website a week in advance of the hearing and copies of the Annual Action Plan were available in other languages upon request.

In addition, notice of the draft Annual Action Plan's availability and the date of the public hearing was included in the Planning and Development Department's weekly report that is distributed digitally to several hundred recipients, including local nonprofits and other organizations serving low- and moderate-income individuals and minorities. A notice for the

public hearing was published in the Newton TAB, as well as in the newspapers of the twelve other WestMetro HOME Consortium communities during the week of March 23, 2020. The notice provided contact information for the city's ADA coordinator, and telecommunications relay service, for anyone that seeks to request a reasonable accommodation.

Consortium Communities

The Towns of Bedford, Belmont, Concord, Lexington, Sudbury and Wayland use public hearings at the Board of Selectmen (Select Board) meetings when broad public input is needed and/or public hearings are required. The local Boards (Bedford Municipal Affordable Housing Trust, Bedford Housing Partnership, Concord Housing Development Corporation, Lexington Housing Partnership, Sudbury Housing Trust, and Wayland Housing Trust) hold monthly meetings to review and deliberate on all proposed or ongoing affordable housing projects.

In Brookline, the Housing Division staffs the Brookline Housing Advisory Board (HAB), which holds monthly meetings to review all affordable housing projects being undertaken or considered by the Town. All final funding commitments for affordable housing projects are approved by the Board of Selectmen, which act on recommendations from the HAB and hold public hearings for public input. All HAB meetings are open to the public and advertised on the Town's website and blog, to all interested parties, including all Town Meeting members.

The Brookline Housing Division reached out to an extensive network of affordable housing advocates including Brookline's boards, commissions, staff, nonprofits, social services agencies, affordable housing developers, and human and health services providers, to participate in the formulation of the FY21-25 HUD's Consolidated Plan. As part of this planning exercise, the Town conducted a housing needs assessment that involved data analysis, public outreach, consultation with stakeholders, and public meetings. A survey yielding 458 responses delivered insight and data on the public's most important housing needs and priorities in order to inform the use of the Town's HOME Investment Partnership Programs funds in the future.

On January 1, 2020, Framingham began its second year as a city. In FY20, the city established new protocols for the process to accepting HUD funds that will continue in FY21. As a result, Community Development Department (CD) staff recommends a budget to the mayor that the City Council ratifies. Once the council provides authorization for the municipality to accept HUD funds, CD staff submits its Annual Action Plan to HUD. The City's Community Development Committee (CDC) holds a series of meetings and public hearings. To amplify CDC outreach efforts, staff invites resident input through newspapers, emails and other forums.

In the spring of 2019, the Town of Natick completed the development of the Natick 2030+ Master Plan, ending a three-year planning process guide achievement of the town's desired vision for its physical environment over the next 20 years. Housing is a major component of this plan. In multiple public engagement events held to date, residents support diversification of the Town's housing stock, development of mid-rise multi-family dwellings (under six stories), development

of more barrier-free dwellings and a wider variety of housing types in town that can accommodate a broad array of inhabitants in various life stages. The Natick Planning Board is reviewing the final draft of the master plan, and is anticipating accepting the Plan and presenting it to the Board of Selectmen and Town Meeting in the spring of 2019. The Natick Affordable Housing Trust is also completing an update of the town's Housing Production Plan, and plans to submit the final plan to the Commonwealth in 2020.

Needham's Affordable Housing Trust conducts meetings to discuss housing initiatives and other housing-related issues. The Trust holds meetings at least twice a year with special meetings as needed, which the public is notified and encouraged to attend.

The City of Waltham Planning Department held a public meeting on January 23, 2019 to gather input on the FY21 (FFY20) Annual Action Plan. Topics discussed included housing and community development needs and proposed use of funds for the upcoming year.

In Watertown, the Watertown Housing Partnership serves as the Town's policy body, whose volunteer members are appointed by the town manager to oversee the development and preservation of affordable housing in Watertown. The Partnership uses email to announce its meetings, as well as agenda postings. The Partnership approved the Watertown components of the FY21 (FFY20) Annual Action Plan.

Please see sheet [AP-12: Citizen Participation](#) at the end of this section for detailed information on outreach.

AP-15: Citizen Participation Outreach for the City of Newton and the WestMetro HOME Consortium

Type of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Topic Area
BEDFORD				
Public Meeting	Non-targeted/broad community	Bedford Public Meeting with Housing Partnership, Housing Authority, Housing Trust and various town department representatives	Attendees reviewed and discussed housing needs and potential uses for HOME funds to support those needs.	NA
BROOKLINE				
Public Meeting	General (with a focus on housing stakeholders)	25 people attended this meeting of the Housing Advisory Board that was held on October 15, 2019	Attendees confirmed the list of needs the Town has developed thus far through the process and added affordable housing for families.	N/A
Public Meeting	Elderly Residents	20 individuals, including residents and practitioners that work with senior citizens, attended this meeting of the Brookline Age Friendly Committee	Support was shown for additional senior housing and preferably, housing with supportive services. The attendees also discussed the transportation and infrastructure needs in the Town.	N/A
Public Meeting	Persons with Disabilities / Non-targeted / Minorities / Non-English speakers	6 individuals attended this meeting of the Brookline Commission on Diversity, Inclusion and Community Relation's Fair Housing Committee	Attendees provided input on the need for increased affordable housing, inexpensive or free childcare, and arts programs for low-income residents.	N/A
Public Meeting	Persons with Disabilities	15 individuals attended this meeting of the Commission on Disability	Attendees provided input on the need for increased affordable and accessible housing that will provide disabled residents the opportunity to age-in-place. Discussion also focused on improved transportation and infrastructure in the Town.	N/A
Public Hearing	Non-targeted broad community	First public hearing to be at a Select Board meeting to discuss process and information collected from needs assessment and receive input	Comments focused on public outreach for the remainder of the planning process. There was also a universal recommendation to host at least two additional public outreach meetings in a neighborhood setting and to broaden outreach to more diverse residents and groups throughout the Town.	N/A
Public Event	Minorities / Persons with Disabilities / Non-targeted/broad community / Residents of Public and Assisted Housing /	Planning staff hosted a table at Brookline Day public event on September 22, 2019. Approximately 300 individuals were invited to take a survey or provide feedback on the town's highest priority needs.	Residents stated that affordable housing was the highest priority area for funding, followed by public services, economic development and public facilities.	N/A
Public Meetings	General	Public meeting held on March 11, 2020 at Egmont Veterans Public Housing Apartments.	Affordable housing should also provide options for individuals in addition to families and elders	N/A
Internet Outreach	Non-targeted broad community / minorities / residents of public and assisted housing	476 responses to a public survey that was issued from August 9th to September 30th; survey available electronically and in-person.	Respondents rated affordable housing as the most important funding activity. Within affordable housing, an emphasis was placed on creating affordable housing for low-income residents and moderate-income residents, families, and seniors. Respondents also provided input on transportation, infrastructure and social service needs in the Town.	N/A
Newspaper Ad	Minorities / Persons with Disabilities / Non-targeted/broad community / Residents of Public and Assisted Housing /	To advertise public meetings and updates on Consolidated Planning process	Completed 1/2020	N/A
CONCORD				
Public Meeting	Non-targeted/broad community	Concord Public Meeting with Housing Development Corporation, Housing Authority, Housing Foundation and various town department representatives	Attendees reviewed and discussed housing needs and potential uses for HOME funds to support those needs.	N/A

Type of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Topic Area
FRAMINGHAM				
Public Meeting	Non-targeted board community	5 residents attended the community needs assessment on December 5, 2019 at City Hall hosted by Community Development Committee	Attendees provided input relative to housing, public services, public facilities, and economic development.	N/A
Focus Group	Other- Housing Providers	5 agencies attended	Focus group participants commented that rental prices are skyrocketing, units that were affordable are no longer affordable, and maintenance upkeep is difficult. More affordable housing vouchers are needed and wait lists are growing for existing affordable housing and vouchers.	
Survey	Minorities / Non-targeted/broad community /Non-english speaking (Portuguese, Spanish)	88 responses received	Housing for people with disabilities, senior housing, energy efficiency measures, and affordable housing were the main housing needs identified by the community. The community also identified the need for supportive services for persons with disabilities, veterans, and homeless individuals and families.	N/A
LEXINGTON				
Public Meeting	Non-targeted/broad community	Lexington Public Meeting with Housing Partnership, Housing Authority, LexHAB and various town department representatives	Attendees reviewed and discussed housing needs and potential uses for HOME funds to support those needs.	N/A
NATICK				
Public Meeting	Non-targeted/broad community	20+ participants in attendance	Preserve existing affordable housing; increase affordable homeownership, help needy elderly with affordable housing options with supportive services	N/A
Public Meeting	Non-targeted/broad community	20+ participants in attendance	Allow more accessory dwelling units in single family homes; enact inclusionary zoning for affordable housing; allow greater residential density where appropriate, particularly near commuter rail lines; expand the price range of housing in town	N/A
Internet Outreach	Non-targeted/broad community	Internet survey with 183 respondents	Encourage: 1) preservation of existing stock of affordable housing; 2) production of homes across a variety of prices and 3) development of homes suited for families	N/A
NEEDHAM				
Public Meeting	Residents of Public and Assisted Housing	Meeting with elected and appointed official regarding tenant needs.	Town representatives participated in a conference call with State Representative Denise Garlick on March 30, 2020 to discuss a meeting that was held with NHA tenants in October 2019 and the new grievance procedures for NHA tenants that were approved in January 2020.	
Focus Group	Residents of Public Housing	The Town assessed the needs of NHA tenants through 12 interviews, 8 focus groups, and a survey with responses from 115 of 296 households.	Results included a wide range of comments regarding many topics including the built environment, community engagement, food access, mental health, substance use and transportation. The purposes was to inform community planning to improve NHA residents' quality of life.	
Public Meeting	Non-targeted/broad community	Needham Affordable Housing Trust meeting held on August 20, 2019	Discussion addressed a range of affordable housing activities, including HOME program needs and planning.	N/A
Public Meeting	Local elected and appointed officials, Town department representatives and area service providers.	Meeting held on August 2, 2019 to obtain input from local and regional elected and appointed officials as well as Town department representatives on housing, including NHA priorities.	Attendees provided input relative to housing and supportive services for NHA staff and tenants including services related to seniors, persons with disabilities, and very low income individuals and families.	N/A

Type of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Topic Area
NEWTON				
Public Meeting	Non-targeted/broad community	Three (3) Community Needs Assessment Sessions were held in September and October 2019. These were open to the public and held in different locations at different times of the day.	Approx. 40 attendees provided their input on the housing, accessibility, public service, homelessness, and quality of life needs and issues in Newton.	N/A
Public Hearing	Non-targeted/broad community	A public hearing was held before the Planning and Development Board on February 3, 2020 on the draft Consolidated Plan. On April 6, 2020 a public hearing was held before the Planning and Development Board on the draft FY21 - 25 Consolidated Plan and FY21 Annual Action Plan.	20 attendees at the February 3 public hearing; discussion centered around citizen participation and outreach, accessibility projects, and housing for low- and extremely low income populations. There were approximately 15 attendees at the April 6 public hearing during which comments centered around prioritizing funds for households earning 0-50% of the AMI and support for public services that increase economic status of lower income populations. The plans were recommended for approval to the Mayor.	N/A
Public Hearing	Non-target/broad community	A public hearing was held before the Zoning and Planning Committee on April 13, 2020 on the draft FY21-25 Consolidated Plan and the FY21 Annual Action Plan.	The Zoning and Planning Committee authorized the City's submission of the FY21-25 Consolidated Plan and the FY21 Annual Action Plan.	N/A
Interdepartmental Focus Groups	Non-targeted/broad community	Multiple focus groups were held with Housing and Community Development staff and other City of Newton departments in the Summer and Fall 2019.	Staff met with representatives from 7 different city departments to collect input on the housing, accessibility, public service, homelessness, and quality of life needs and issues in Newton.	N/A
Internet Outreach	Non-targeted/broad community	Staff utilized email outreach and the Dept.'s Friday Report and website to inform the public of the Consolidated Planning process.	Participants throughout the planning process provided their input on the housing, accessibility, public service, homelessness, and quality of life needs and issues in Newton.	N/A
Newspaper Ad	Non-targeted/broad community	Ad published in 12 community newspapers (WestMetro HOME Consortium region) to advertise the February 3rd and April 6th public hearing on the draft Consolidated Plan and draft Annual Action Plan.	Staff will continue to incorporate public feedback into the Consolidated Plan, as appropriate.	N/A
Meetings with Boards and Commissions	Local elected and appointed officials	Staff attended regularly scheduled meetings of the following committees to solicit input on the Consolidated Plan: Fair Housing Committee, Planning and Development Board, Commission on Disability, and Newton Housing Partnership.	Members of these commissions and boards provided their input on the housing, accessibility, public service, homelessness, and quality of life needs and issues in Newton.	N/A
Brown Bags	Area service providers	Staff held 2 brown bag sessions, focus groups with other housing and social service providers, to express the pressing needs of the extremely-low and low-income elderly population living in Newton.	Approx. 22 participants attended the ESG and Human Service brown bag sessions, providing specific information on the needs of the population and the gaps in services.	N/A
SUDBURY				
Public Meeting	Non-targeted/broad community	Sudbury Public Meeting with Housing Authority, Housing Trust and various town department representatives	Attendees reviewed and discussed housing needs and potential uses for HOME funds to support those needs.	NA
WALTHAM				
Public Meeting	Residents of Public and Assisted Housing; Persons with Disabilities	Meeting held on September 19, 2019 to receive input from residents on planned improvements to the Waltham Housing Authority, funded through the HOME program.	The Mayor, City Councillors, Housing Department Assistant Director and the Executive Director of the Waltham Housing Authority attended the resident meeting. Discussion and input focused on the WHA planned improvements.	N/A
Public Hearing	Non Targeted Outreach	City Councilors hearing regarding the use of CDBG and HOME funding within the community.	Councillors discussed the Consolidated Plan and asked programmatic questions of the Housing Division and Planning Department.	N/A

Type of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Topic Area
Survey	Non Targeted Outreach	Need assessment survey, offered electronically and in paper form, to understand the community's perspective on priority projects and funding.	Comments generally speaking to the lack of affordable housing and ADA compliant facilities in the City.	N/A
Public Meeting	Non Targeted Outreach	On April 9, 2020 the City was scheduled to hold a public meeting to release funding decisions for the upcoming grant year and release the final version of the FY21-25 ConPlan. In lieu of the meeting which was cancelled due to COVID-19, an email was distributed to the City's listserv with the proposed FY21 budget and the final 5 year plan, for comment.	Comments received were general questions regarding the funding process and how COVID-19 will impact the start of the program year (July 1, 2020).	N/A
Public Meeting	Non Targeted Outreach	Meeting to discuss the Consolidated Plan and seeking comments from community members.	Discussion centered around the next steps and when the plan will be implemented.	N/A
WATERTOWN				
Public Meeting	Elected officials and housing advocates	Meeting to discuss the Consolidated Planning process	Attendees expressed support for additional affordable housing, efforts to allow Accessory Dwelling Units, creation of a Housing Trust, creation of funding sources, and rental assistance programs.	N/A
Public Meeting	Elected officials and housing advocates	Meeting seeking input on housing needs and HOME priority allocations	Feedback included general comments regarding background on the HOME program and support for local preference for all housing programs	N/A
Public Notice via email	Non Targeted Outreach	Informing public on the Consolidated Planning process	N/A	N/A
WAYLAND				
Public Meeting	Non-targeted/broad community	Wayland Public Meeting with Housing Partnership, Housing Authority, Housing Trust and various town department representatives	Attendees reviewed and discussed housing needs and potential uses for HOME funds to support those needs.	NA
Public Hearing	Non-targeted/broad community	Board of Selectman public hearing to review and approve plan	Meeting not held yet	NA

Expected Resources

AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

1. Introduction

The City of Newton anticipates receiving \$3,579,089 in CDBG, HOME and ESG funds, plus an additional \$450,000 in program income, during the July 1, 2020- June 30, 2021 program year. Investments are targeted to a myriad of community needs and priorities identified in the FY21-25 Consolidated Plan and include the acquisition, development, rehabilitation, and preservation of affordable housing; homelessness assistance and prevention; human services; architectural access and program administration. To maximize the impact of these HUD entitlement funds, the city strategically leverages additional funds and partnerships whenever possible.

See [AP-15: Anticipated Resources](#) at the end of this section.

2. Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The city will use federal funds to leverage additional resources in several ways. With respect to affordable housing projects, federal HOME and CDBG funds will be complemented with city controlled Community Preservation Act (CPA) funding to produce and preserve affordable units wherever possible. CPA funding provides the flexibility to produce mixed-income developments, as this funding source can be used to support households earning up to 99% of AMI. Available funds collected as a result of the city's Inclusionary Zoning Ordinance can further supplement these resources. Inclusionary Zoning (IZ) funds are collected from developers of multi-family housing projects in lieu of providing affordable units on site. A combination of public investments using CDBG, HOME, CPA and IZ funding, in addition to other state investments (such as tax credits etc.) and private financing, facilitate affordable housing development in Newton.

Relative to CDBG human services, and ESG, respondents to the city's request for proposals (RFP) must detail complete program costs and resources to be utilized in conjunction with the CDBG funds. ESG funds are required to be matched by 100 percent. Leveraged funds include fundraised dollars, McKinney-Vento funds, housing vouchers, community foundations and trusts, and state grants allocations. In FY19 (FFY18), the ESG program exceeded its requirement and leveraged approximately \$1.6 million in matching funds with a combination of state and private funds. While the public services program does not have a matching requirement, in FY19 (FFY18), the program leveraged approximately \$16 million from private foundations,

organizational fundraising, state agencies, the City, and program fees.

HOME communities support housing projects by leveraging HOME funds with state, Community Preservation Act, Inclusionary Zoning and other town funds. Communities additionally report forgone taxes from HOME match-eligible affordable housing units and state and local tenant based rental assistance program funds as contributions toward HOME's 25 percent match requirement.

In FY21, the Town of Belmont will use HOME administration funds to put together a state housing grant application. The funds, if granted, will be used to assess possible development opportunities at an existing Belmont Housing Authority housing development. Depending on the outcome of the state grant, the Town will use HOME administration funds to put together another Community Preservation Act grant application. If approved by Town Meeting, the CPA funds will be used to further assess possible development opportunities at an existing Belmont Housing Authority housing development. Additionally, the Town will explore using HOME funds to provide deeper affordability at two housing developments currently under construction.

In FY21 (FFY20), the Town of Brookline is considering committing HOME funds to continue supporting the Brookline Housing Authority's (BHA) Strategic Preservation Initiative, or one of two additional projects still in the early, conceptual planning stage: the Brookline Senior Hub at 108 Centre Street and the development of an affordable rental senior housing project (62+) at the Kent/Station Street Town-owned parking lot. In all of these cases affordable rental housing units will be created or preserved and once a project is selected, the Town anticipates setting aside federal funds (HOME Program) to match municipal, state and federal funding (CDBG), and private investment in the form of sponsor loans, bonds and low income housing tax credit equity.

In FY21, the Town of Concord anticipates formally committing \$442,943.40 in FY19, FY20 and consolidated pool HOME funds to the Junction Village development. The Junction Village project is currently seeking state funding, and the town has contributed an additional \$2,000,000 in local funds towards the construction of 83 new units of assisted living.

In fulfilling its mission to create affordable housing and rehabilitate housing stock with HOME funds, City of Framingham projects have included CDBG, historic and low-income housing tax credits, Emergency Solutions Grant, National Housing Trust Fund, HOPWA and private funds, among others. In the City's most recently completed major rehabilitation project, HOME funds served as a resource to combat homelessness. By subsidizing 11 units at the 53 single-room occupancy facility, the city used HOME funding to support accessibility upgrades and rapid re-housing services for homeless individuals transitioning to self-sufficiency. This project also leveraged nearly \$500,000 in private funds and donated developer fees. The City expects to use HOME funds in the same manner in the future.

In 2019, the Town of Natick, through its Affordable Housing Trust, completed the development of two affordable dwellings at 299 Bacon Street using Special Permit Mitigation funds. The Trust has also been allocated \$240,000 in municipal funds since 2018 (\$80,000 per year) to develop affordable housing from Town Meeting, and will continue making regular requests in the future. These funds will be augmented by fees paid to the Trust by housing developers under the Natick's new Inclusionary Requirements for Affordable Housing.

In FY20, the Town of Sudbury committed \$178,203 in HOME funds to the Coolidge Phase II project, augmenting \$250,000 in committed local funds, \$320,000 in proposed local funds and \$15,000,000 in state subsidies. The completion and occupancy of this project is anticipated during FY21.

The Housing Division and the Waltham Housing Authority (WHA) are in the scoping stages of renovations to a 59 unit elderly housing complex that will use HOME funds and Community Preservation funds to sustain the property. The Community Preservation Committee has awarded \$50,000 to the WHA in 2019 for an architectural study to be completed on the roofing structure. The design was finalized and the CPA Committee awarded an additional \$300,000 to complete the roof project in 2020. The Municipal Housing Trust Fund Committee has allocated \$100,000.00 to the Housing Division to fund the 2020 Emergency Assistance Program to provide emergency assistance to residents facing eviction or a housing emergency, accounting for another source of leveraged funds.

As a result of the November 2016 election, Watertown adopted the Community Preservation Act (CPA). The Town enacted a two percent surcharge, and has created the property assessment and taxation infrastructure to collect and sequester these funds. The CPA funds can be used in the future to leverage federal HOME funds. Recently, the Town also revised the cash-in-lieu payment for affordable Inclusionary Zoning units, and created a new payment amount for affordable assisted living units.

3. If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

In FY18 (FFY17), the City of Newton released a Request for Proposals for the development of an underutilized, municipally-owned site located at 160R Stanton Avenue. 2Life Communities, formerly known as Jewish Community Housing for the Elderly, was selected as the developer to expand their existing Golda Meir House at 160 Stanton Avenue to create 68 new units of affordable senior housing, including nine units of permanent supportive housing for chronically homeless adults with disabilities. To successfully provide permanent supportive housing, 2Life Communities has partnered with Hearth, Inc., a nonprofit organization dedicated to the elimination of homelessness among the elderly through prevention, placement, and housing programs. This project has been awarded LIHTC funds from the Massachusetts Department of Housing & Community Development (DHCD) and a Section 202 award from HUD. Construction is slated to commence in the fall of 2020.

In addition, the City of Newton will be supporting the development of the Haywood House. Haywood House will be constructed on underutilized land owned by the Newton Housing Authority and will consist of 55 one-bedroom rental apartments, of which 32 units will be affordable to elderly households at or below 60% AMI. Four units will be designated for households that are homeless or are at-risk of homelessness. This project has also been awarded LIHTC funds from DHCD, allowing construction to commence summer of 2020.

In FY20 (FFY19), the Newton Housing Authority received funding approval from the City's Planning & Development Board and Community Preservation Committee to acquire and preserve the CAN-DO affordable housing portfolio of 33 units across 12 scattered sites in Newton. In 2018, CAN-DO disaffiliated from its management partner, Metro West Collaborative Development, placing the future of the portfolio in jeopardy. The City's Planning & Development Board voted to approve \$1,200,000 of CDBG funds to support the acquisition and rehabilitation of the portfolio. CDBG funds will be used to reduce the portfolio's existing debt and to fund capital needs improvements across the 12 sites. As the CDBG funding is pulling from FY19, FY20, and FY21 dollars, the Planning and Development Board approved a substantial amendment to the FY19 and FY20 Annual Action Plans and FY16-FY20 Consolidated Plan, as well as a conditional pre-commitment of FY21 funds. The preservation of this critical portfolio aligns with the priorities of the City's Consolidated Plan, as it serves some of Newton's most vulnerable households - extremely low- and low-income individuals who require a variety of supportive services.

Lastly, the City of Newton will continue to explore the West Newton Armory site on Washington Street for the purposes of redeveloping the property as 100% affordable housing, possibly coupled with supportive services. The City Council has begun its Real Property Reuse Process to determine the ultimate use of the site, should the City purchase the property from the Commonwealth. Most recently, the City of Newton was awarded a \$200,000 Housing Choice Grant from the Department of Housing & Community Development (DHCD) to conduct a predevelopment feasibility study on the site, which was formerly operated by the National Guard and has since been vacant for over ten years. The City plans to hire an affordable housing development consultant team to conduct this detailed study. Should the City choose to purchase the site from the state for affordable housing, a Request for Proposals will be released in FY21 to identify an appropriate affordable housing developer to develop and manage the site.

In Brookline there is a proposed project to develop senior affordable housing above the Kent/Station Municipal Parking Lot. This parcel was identified in the Town's Housing Production Plan as appropriate for this type of use.

The Town of Belmont will examine existing Belmont Housing Authority properties to assess potential housing development opportunities at these locations.

The Junction Village property in Concord is owned by the Concord Housing Development Corporation (CHDC), the CHDC is working with a private developer to construct 83 units of affordable housing for seniors 62+ years old with tiers of affordability: 17 units for extremely low income households at 30% AMI, 26 units for very low income households at 60% AMI, and 40 units for high moderate income households at 150% AMI. The project, known as Christopher Heights of Concord will be funded in part by local and state HOME funds.

Waltham has been approved for a 4.3 million dollar HUD Section 108 Loan for the revitalization of the Woerd Avenue Dump and surrounding area.

The Wayland Housing Trust currently owns a parcel of land where the Town would like to construct one unit of low-moderate income rental housing. The project will be partially funded by local HOME funds. The Town of Wayland continues to work to sell a town-owned parcel for the development of a 218 unit multi-family rental community. Fifty-five (55) of the units will be designated affordable and a portion of the project will be age-restricted. This development, Rivers Edge, will serve the need of low-moderate income families and add housing choices for the increasing senior population in Wayland.

AP-15 Anticipated Resources for City of Newton & WestMetro HOME Consortium for FY21

Program	Source	Use of Funds	Expected Amount Available FY21 (FFY20)		Amount Expected to be Available the Remainder of the ConPlan	Narrative Description
CDBG	public - federal	Acquisition/Mortgage Refinance for Housing Development, Administration & Planning, Housing Rehabilitation, Public Facilities Improvements, Architectural Access Improvements, Public Services	Annual Allocation (\$)	\$1,931,323.00	\$7,725,292.00	Please see word document for narrative.
			Program Income (\$)	\$100,000.00	\$460,000.00	
			Prior Year Resource(s)	\$46,882.33		
			Total(\$)	\$2,078,205.00	\$8,185,292.00	
HOME	public - federal	Homebuyer Assistance, and Creation and Rehabilitation of Rental Units. CHDO Operating and Administrative Funds.	Annual Allocation (\$)	\$1,480,032.00	\$5,920,128.00	Unexpended HOME PI is \$206,619.62 and HP is \$470,653.78
			Program Income (\$)	\$350,000.00	\$1,400,000.00	
			Prior Year Resource(s)	\$2,922,716.79		
			Total(\$)	\$4,752,748.79	\$7,320,128.00	
ESG	public - federal	Financial Assistance, Overnight Shelter, Rapid Re-housing, Rental Assistance, Homelessness Prevention Services, Transitional Housing, Street Outreach	Annual Allocation (\$)	\$167,734.00	\$670,936.00	Please see word document for narrative.
			Program Income (\$)			
			Prior Year Resource(s)			
			Total(\$)	\$167,734.00	\$670,936.00	

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

1. Goals Summary Information

The City of Newton receives Community Development Block Grant (CDBG), HOME Investment Partnership (HOME) and Emergency Solutions Grant (ESG) funds from the U.S. Department of Housing and Urban Development (HUD). These funds are utilized to address housing and community development needs in the City of Newton and housing needs in the WestMetro HOME Consortium communities. The FY21 (FFY20) Annual Action Plan identifies eight goals for the City of Newton and three for the WestMetro HOME Consortium.

Goal: Production of New Affordable Housing Units

In FY21 (FFY20), CDBG and HOME funding allocated to the City of Newton will continue to be used for a variety of programs and activities to preserve and expand affordable opportunities across the city. In alignment with the FY21-FY25 Consolidated Plan, the Division will seek to fund affordable housing projects near amenities, village centers, and public transportation options to promote housing equality and economic and demographic diversity. The Division will also look to support projects that provide Newton seniors the opportunity to remain in the community as they age. Additionally, the Division will identify projects that expand the stock of accessible and visitable housing.

Through prior years CDBG and HOME funding, it is anticipated that eight units of affordable rental housing will be completed at 236 Auburn Street. This project, developed by CAN-DO/Metro West, includes the acquisition and rehabilitation of an existing historic single-family home into a three-bedroom rental and the new construction of a duplex with one 2-bedroom and one 3-bedroom rental unit. Both homes will be affordable to households at or below 60% AMI. The project also includes the construction of a 5-bedroom congregate home for developmentally disabled adults at or below 30% AMI. This will be owned and operated by the Barry Price Center. The project at 236 Auburn Street is anticipated to receive its Certificate of Occupancy in March 2020.

The City awarded approval of FY20 CDBG funds to the Newton Housing Authority's (NHA) Haywood House project, which will create 55 new affordable rental units for seniors. The income eligibility will range from 30% AMI to up to 99% AMI. Three of the units will be fully accessible and four units will be designated for households that have been homeless or are at risk of homelessness. The project will also include two elevators and community space for supportive services. The NHA received a Comprehensive Permit in July 2018 and in February 2020 was awarded Low Income Housing Tax Credits from the Massachusetts Department of Housing & Community Development (DHCD), allowing construction to commence in early FY21.

In FY21, the City of Newton will continue to explore the West Newton Armory site on Washington Street for the purposes of redeveloping the property as 100% affordable housing, possibly coupled with supportive services. The City Council has begun its Real Property Reuse Process to determine the ultimate use of the site, should the City purchase the property from the Commonwealth. Most recently, the City of Newton was awarded a \$200,000 Housing Choice Grant from the Department of Housing & Community Development (DHCD) to conduct a predevelopment feasibility study on the site, which was formerly operated by the National Guard and has since been vacant for over ten years. The City plans to hire an affordable housing development consultant team to conduct this detailed study. Should the City choose to purchase the site from the state for affordable housing, a Request for Proposals will be released in FY21 to identify an appropriate affordable housing developer to develop and manage the site.

Goal: Preservation of Affordable Units

In FY20 (FFY19), the Newton Housing Authority received funding approval from the City's Planning & Development Board and Community Preservation Committee to acquire and preserve the CAN-DO affordable housing portfolio of 33 units across 12 scattered sites in Newton. In 2018, CAN-DO disaffiliated from its management partner, Metro West Collaborative Development, placing the future of the portfolio in jeopardy. The City's Planning & Development Board voted to approve \$1,200,000 of CDBG funds to support the acquisition and rehabilitation of the portfolio. CDBG funds will be used to reduce the portfolio's existing debt and to fund capital needs improvements across the 12 sites. As the CDBG funding is pulling from FY19, FY20, and FY21 dollars, the Planning and Development Board approved a substantial amendment to the FY19 and FY20 Annual Action Plans and FY16-FY20 Consolidated Plan, as well as a conditional pre-commitment of FY21 funds. The preservation of this critical portfolio aligns with the priorities of the City's Consolidated Plan, as it serves some of Newton's most vulnerable households - extremely low- and low-income individuals who require a variety of supportive services.

Goal: Support Affordable Homeownership

Staff will continue to administer a Downpayment/Closing Cost Assistance program using CDBG funds. This program works to support and expand sustainable homeownership among low- and moderate-income households in Newton. The program will target first-time homebuyers of new and existing deed restricted homeownership units. It is anticipated that up to one income-eligible homebuyer will be assisted through the CDBG Downpayment/ Closing Cost Assistance program in FY21.

Goal: Rehabilitation of housing

Staff will continue to market and administer the Housing Rehabilitation program (Rehabilitation program) on a rolling basis, which provides homeowners and qualifying nonprofit organizations with deferred payment loans for repairs and improvements aimed at addressing issues related to health, safety, and building code violations. The Rehabilitation program was also recently expanded to include existing accessory apartments and lodging houses that require repairs to ensure resident health, safety, and building code compliance. Through FY21 and prior year funding, it is anticipated that approximately three units of homeowner housing will be rehabilitated through CDBG assistance and 25 rental units, which are included in the acquisition of CAN-DO's portfolio of rental properties.

Goal: Provision of supportive services to the homeless and at-risk of homeless

With respect to the Emergency Solutions Grant (ESG), \$149,850 was allocated through a competitive RFP process for local providers to provide emergency shelter, homelessness prevention, and rapid rehousing assistance to homeless and at-risk individuals and families. In addition, local providers may seek ESG funds to support contributing data for the Homeless Management Information System (HMIS) or the implementation of a comparable database for victim service providers. The City of Newton, BoS CoC, and the BNWW providers balanced consideration of the population's greatest needs in the immediate region and HUD's increased emphasis on funding for rapid re-housing and homelessness prevention. During FY21 (FFY20), ESG funding will support 8 programs across 5 sub-grantees.

Goal: Increase awareness of fair housing policies and practices

Consistent with the 2015-2020 WestMetro HOME Consortium Regional Fair Housing Plan, the city, in conjunction with the Fair Housing Committee, will continue to collaborate to increase knowledge about fair housing laws and obligations, identify and address discriminatory actions, increase city and Consortium capacity to affirmatively further fair housing and advance access to housing opportunity for all. Division staff will take part in training on fair housing during FY21 and will in turn support a number of assorted programs designed to educate elected officials, decision makers, and the general public about these obligations.

The City and WestMetro HOME Consortium will also initiate development of the 2021-2025 Regional Analysis of Impediments, which, in addition to the above measures, will outline meaningful goals and objectives to undertake in overcoming identified barriers to fair housing choice and opportunity throughout Newton and the 13-member Consortium.

Goal: Provision of human services

Human service grants will support 13 public service agencies and organizations during FY21 (FFY20). A total of \$289,698 was distributed through a competitive process held in conjunction with the ESG RFP. Selected projects will cover a wide range of services that will address the needs of vulnerable populations and the City's three priority areas: 1.) Enrichment and Care for Vulnerable Youth; 2.) Stability and Self-Sufficiency for Vulnerable Adults; and 3.) Promoting Economic Security and Vitality for Older Adults. These projects will directly benefit low- to-moderate- income youth, adults, seniors, as well as persons with disabilities and move these individuals and families toward economic mobility and/or stability.

Goal: Implementation of architectural accessibility improvements for persons with disabilities

Five percent of the FY21 (FFY20) CDBG allocation, \$95,000, will be allocated toward two projects. These projects include the reconstruction of the Marty Sender Path connecting the Cove and Lyons Playground in Auburndale and the installation of curb cuts at priority intersections, which will be identified by the Department of Public Works.

HOME Consortium Goals

Goal: Tenant Based Assistance for Rental Housing

In FY21, it is anticipated that 57 households will be assisted through Tenant Based Rental Assistance (TBRA) programs in Bedford, Framingham, Natick, Waltham and Wayland. The upfront costs required to access affordable rental housing in the Consortium presents a barrier for many lower income households. Rising rents in the region have also caused an increase in the security deposit fees and first/last month rent, which continue to place demand on these rental assistance programs.

In addition to providing one-time rental assistance, through Waltham's TBRA program, the City also supports near homeless families and very low-income, at-risk elderly households who are on the Waltham Housing Authority's wait list with ongoing rental assistance. The wait time for these households can be up to three years. The temporary rental assistance provided through Waltham's TBRA program safely bridges these households into public housing.

Goal: Rehabilitation of Existing Units

In FY21, HOME funds will be used to rehabilitate three homeowner-occupied housing units in Framingham and two rental units in Waltham. The City of Framingham operates a HOME-funded rehabilitation program for income-eligible homeowners to address safety repairs, hazard abatement and the removal of architectural access barriers. HOME and Community Preservation funds will be used to renovate 59 Waltham Housing Authority elderly housing units at the Beaverbrook Elderly Apartments; two of the existing units will become fully accessible. Other communities will continue to progress on local renovation projects, including several efforts to rehabilitate housing authority units.

Ongoing progress

Brookline will continue to work with the Brookline Housing Authority (BHA) on its Strategic Preservation Initiative as the BHA moves into phases II and III of its Preservation Initiative, utilizing the HUD Rental Assistance Demonstration program (RAD). Phase II includes the redevelopment of Morse apartments, (FY20 funds), as well as the Sussman and Kickham apartments. Brookline will provide support as funding gaps emerge in these proposed preservation projects.

The Town of Lexington has committed FY18, FY19 and FY20 HOME funds towards the renovation of five units owned by the Lexington Housing Authority (LHA) at Pine Grove Village. The completion and occupancy of this project is expected in FY20. In FY21, the Town will work with local stakeholders, the LHA and the Lexington Housing Assistance Board (LEXHAB) to identify future HOME funded programs and projects.

Needham continues to work with the Needham Housing Authority on potential modernization and/or redevelopment efforts to improve and the supply of affordable units in the community.

Goal: Production of Affordable Units

The high percentage of lower income households in the region spending more than thirty percent of their income on housing costs (identified in the Consolidated Plan's Needs Assessment), emphasizes the Consortium's priority on affordable housing production. Construction of four HOME-assisted rental units will be complete in FY21. Two of these units are part of Phase II of The Coolidge at Sudbury and two are included in Belmont's Bradford Estate project.

The Town of Sudbury committed HOME funds to the Coolidge Phase II project in FY20. The project is the second phase of The Coolidge at Sudbury and will consist of 56 one bedroom units restricted to households with at least one member who is 55 years or older; two of these units will be HOME assisted. Phase I of the project, completed in 2014, was a fully occupied 64-unit affordable rental development restricted to households with at least one member who is 55 years or older. Phase II is anticipated to be complete and occupied in FY21.

HOME funds will be used to provide deeper affordability for two of the 12 units of housing Belmont's Bradford Estates, a mixed income development. In FY21, the Town of Belmont will continue to look for housing development opportunities through redevelopment of Housing Authority properties, development of a zoning by-law that allows 144 housing units at Zone 3 in the McLean District, and supporting the development the Underwood Estates, a mixed-use developments with 115 units.

Ongoing progress

Brookline is in the process of selecting a developer who can develop and manage a rental senior housing project (62+) at the Kent/Station Street Town-owned parking lot. Existing municipal parking will be retained on-site, while creating a range of approximately 40 to 65 age-restricted

rental units for seniors. The project will underwrite affordable housing available to a range of incomes.

The Town of Brookline is also exploring the possibility of supporting the development of a senior hub in Coolidge Corner at 108 Centre Street. Hebrew Senior Life (HSL) seeks to construct a community center and senior living on HSL's property that connects to the current Brookline Senior Center through a ground-floor glass walkway. The Senior Hub is an effort to serve more seniors in need of housing and supportive services. The plan is in the early, conceptual planning stage. Many significant decisions remain to be determined and are subject to negotiations between parties.

Concord plans to continue supporting the Junction Village affordable assisted living facility. The facility will include 83-units of new construction overall, four of which will be HOME assisted units. All units will be restricted. Junction Village received its Comprehensive Permit and has applied to DHCD for funding.

AP-20 FY21 GOALS FOR NEWTON AND THE WESTMETRO HOME CONSORTIUM

Name of Goal	Funding	Description of Goal	Priority Needs Addressed	Category of Goal	Start Year	End Year	Outcome	Objective	Goal Outcome Indicator	Quantity	GOI Unit of Measurement
NEWTON											
Administration	CDBG: \$406,264.60	Administration of the CDBG program	Affordable housing, production of units; Affordable housing, rehab.; Affordable housing, acquisition of existing units; Non-Housing Community Development, public services; Architectural Access; Fair Housing	Affordable housing; Non-homeless special needs; Non-housing community development	2021	2025	Availability/Accessibility	Create suitable living environments	23- Other (Organization)	1	23- Other (Organization)
Production of New Affordable Units	CDBG: \$1,158,800.40	Create affordable rental and ownership housing near amenities, village centers, and public transportation options to promote housing equality and economic and demographic diversity. Support older adults to allow them to remain in Newton as they age.	Affordable housing, production of units	Affordable housing	2021	2025	Affordability	Provide decent affordable housing	7-Rental units constructed	0	7-Household housing unit
									9-Homeowner housing added	0	9-Household housing unit
Support Affordable Homeownership	\$0	Financial support for low- and moderate-income first-time homebuyers purchasing deed-restricted affordable units.	Affordable housing, rehab of existing units	Affordable housing	2021	2025	Affordability	Provide decent affordable housing	11-Direct financial assistance to homebuyers	1	11-Households assisted
Rehabilitation of Existing Units	CDBG: \$65,000.00	Continued funding for the housing rehab program for income-eligible residents, including improvements for accessibility and safety, especially for seniors to encourage aging in place.		Affordable housing	2021	2025	Sustainability	Create suitable living environments	8-Rental units rehabilitated	25	8-Household housing unit
Preservation of Affordable Units	\$0	Preserve the affordability of deed-restricted units to support successful tenancy of low- to moderate-income residents of Newton.	Affordable housing; acquisition of existing units	Affordable housing	2021	2025	Sustainability	Provide decent affordable housing	10-Homeowner housing rehabilitated	3	10-Household housing unit
Fair Housing	\$0	Meet the need for more fair housing education, enforcement, and obligations.	Fair Housing	Affordable housing	2021	2025	Availability/accessibility	Provide decent affordable housing	23-Other - please specify	33	23-Other - please specify
Supportive Services for Homeless and At-Risk of Homelessness	ESG: \$167,734.00	Provide supportive services for individuals and families that are homeless or at-risk of homelessness, including financial support for existing emergency and transitional housing.	Homeless, emergency shelter/transitional housing; homeless, prevention; homeless, rapid re-housing	Homeless	2021	2025	Availability/accessibility	Create suitable living environments	23-Other - please specify	1	23-Other - please specify
Human Services	CDBG: \$319,698.00	Financial support for programs that directly benefit low- and moderate-income youth, families, seniors, and persons with disabilities.	Non-Housing Community Development, public services	Non-homeless special needs	2021	2025	Availability/accessibility	Create suitable living environments	23-Other - please specify	824	23-Other - please specify
Architectural Access	CDBG: \$128,442.33	Remove architectural barriers and increase access and mobility throughout the City to public thoroughfares, public buildings, parks and recreational facilities.	Architectural Access	Non-housing community development	2021	2025	Availability/accessibility	Create suitable living environments	3-Public service activities other than Low/Moderate Income Housing benefit	2,506	3-Persons assisted
HOME CONSORTIUM											
Administration	HOME: \$157,712.66	Administration of the HOME program	Tenant Based Assistance; Housing Rehab; Production of Rental Units	Affordable housing	2021	2025	Affordability	Provide decent affordable housing	23- Other (Organization)	9	23-Other (Organizations)
Tenant Based Assistance for Rental Housing	HOME: \$804,923.99	HOME funds will be used for local TBRA programs to assist eligible households with security deposit assistance to move-in to affordable rental housing.	Tenant Based Assistance for Rental Housing	Affordable housing	2021	2025	Affordability	Provide decent affordable housing	12-Tenant-based rental assistance / rapid rehousing	57	12-Households Assisted
Rehabilitation of Existing Units	HOME: \$1,493,821.68	HOME funds will be used to support the rehabilitation of affordable rental units, including public housing, and homeowner housing throughout the Consortium.	Housing Rehab	Affordable housing	2021	2025	Sustainability	Provide decent affordable housing	8-Rental units rehabilitated	2	8-Household housing unit
									10-Homeowner housing rehabilitated	3	8-Household housing unit
Production of Affordable Units	HOME: \$1,879,875.81	HOME funds will be used to increase affordable rental housing in the Consortium.	Production of Rental Units	Affordable housing	2021	2025	Affordability	Provide decent affordable housing	7-Rental units constructed	4	12-Households Assisted
									9-Homeowner housing added	0	12-Households Assisted
CHDO-Set Aside	HOME: \$292,413.06	HOME funds will be used to create affordable rental housing through acquisition, rehabilitation and development by CHDOs	Production of Rental Units; Housing Rehab	Affordable housing	2021	2025	Affordability	Provide decent affordable housing	8-Rental units rehabilitated	0	8-Household housing unit
									7-Rental units constructed	0	8-Household housing unit
CHDO Operations	HOME: \$124,001.60	HOME funds for the operation of Community Housing Organizations in the WestMetro HOME Consortium.	Production of Rental Units; Housing Rehab	Affordable housing	2021	2025	Affordability	Provide decent affordable housing	23 - Other (Organization)	1	23 - Other (Organization)

AP-35 Projects - 91.420, 91.220(d)

1. Introduction

During the first year of the 2021-2025 Consolidated Plan, funding will address unmet community needs and continuing commitments to priority multi-year initiatives. Proposed projects and activities remain consistent with HUD priorities, seeking to primarily assist vulnerable low-to-moderate income residents through the creation and preservation of decent housing, suitable living environments and expanded economic opportunity.

See sheet [AP-35: Projects](#) at the end of this section.

2. Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

Division staff allocated CDBG funding to four general categories: Affordable Housing, Human Services/Public Services, Architectural Access, and Program Administration. These categories are funded based on the priorities and needs detailed in the FY21-25 Consolidated Plan.

Affordable Housing

Approximately 60 percent of CDBG funds, \$1,158,800.40 combined with \$65,000 in estimated FY21 program income, will be allocated to affordable housing projects to be identified during the FY21 program year. This funding will be used to facilitate housing rehabilitation and acquisition of units for low- and moderate-income households.

Human Services/Public Services

The Human Service Grants will fund 13 public service agencies and organizations during FY21 (FFY20). These programs directly benefit low-to-moderate income residents, offering a critical network of supports to provide essential services for low-to-moderate income children, youth, families, adults, seniors and persons with disabilities and assist in stabilizing vulnerable families across the lifespan. The city intends to allocate 15 percent of CDBG funds to these programs, approximately \$289,698, the maximum allowed by regulation. These funds will be combined with \$15,000 in prior year program income and \$15,000 in anticipated program income.

Architectural Access

Five percent of the FY21 (FFY20) CDBG allocation, \$96,560, combined with \$31,882.33 in prior year CDBG funds remaining, will be allocated to two projects. These projects include the reconstruction of the Marty Sender Path connecting The Cove/Auburndale Playground and Lyons Park in Auburndale and the installation of curb cuts city-wide.

Program Administration

Staff intends to allocate the maximum allowable amount of 20 percent for program

administration, or \$386,264 combined with \$20,000 in anticipated FY21 program income.

Federal funds will be used to assist the greatest number of families and households possible, however, the primary obstacle to addressing underserved needs in the categories listed above continues to be limited funding. Neighborhood opposition to affordable housing projects and ever-increasing land costs and market values presents an additional challenge to increasing housing opportunities for low-income households.

AP-35: Projects for City of Newton & WestMetro HOME Consortium for FY21

Project Name	Target Area (if applicable)	Priority Needs Addressed	Project Description	Estimated Funding Allocation	Target Date of Completion	Estimate the number and type of families that will benefit from the proposed activities:	Planned Activities:
Housing Rehabilitation and Development	City-wide	Affordable housing - rehab of existing units; Affordable housing - acquisition of existing units; Affordable housing - production of new units	CDBG funds will be used for: 1. rehabilitation of owner-occupied one- and two-family residential structures, owner-occupied condominium units and rental units owned by the Newton Housing Authority and nonprofit affordable housing development organizations and providers; 2. acquisition of housing units for permanently restricted affordable housing; 3. write down of mortgages for the purpose of creating permanently restricted affordable housing; and 4. preservation of existing affordable housing.	\$1,223,800.40	6/30/2021	29	Rehabilitation of capital improvements to rental housing acquired by the Newton Housing Authority from CAN-DO and rehabilitation of income-eligible homeowner units.
Public Services	City-wide	Human services	Funds for public services for low- and moderate-income Newton residents focusing on the following populations: children and youth, disabled adults, adults and families, and elderly. Funding is comprised of 15% of FY21 CDBG Entitlement funds (\$289,698) plus 15% of FY20 program income (\$15,000).	\$319,698.00	6/30/2021	796	The Human Service Grant will fund 13 public agencies and organizations to provide services to children and youth, persons with disabilities, survivors of domestic violence, adults and families, and elderly.
Accessibility Improvements	City-wide	Architectural access	Funds for the installation of an accessible curb cuts city-wide and a park pathway in Auburndale.	\$128,442.33	6/30/2021	517	ADA Accessible curb cuts and Park Pathway.
CDBG Program Management	City-wide	Affordable housing - rehab of existing units; Affordable housing - acquisition of existing units; Affordable housing - production of new units; Human services; Architectural access, Fair housing	Funds for the management and implementation of the CDBG program including citizen participation and program delivery in support of preservation, rehabilitation, and development of affordable housing.	\$406,264.60	6/30/2021	N/A	Administrative services and costs.
HOME Administration	City-wide	Tenant Based Rental Assistance; Housing Rehabilitation; Production of Rental Units	Funds for the administration of the WestMetro HOME Consortium, which is equal to 10% of the annual allocation. Seven percent of the allocation goes to local communities for administration of their projects. Three percent of the allocation is set aside for general Consortium administration and compliance.	\$157,712.66	6/30/2021	N/A	Administrative services and costs.
HOME Tenant-Based Rental Assistance	N/A	Tenant Based Rental Assistance	Provide income-eligible renters with rent and/or security deposit assistance.	\$804,923.99	6/30/2021	57	TBD
HOME Rehabilitation	N/A	Housing Rehabilitation	Funds for the rehabilitation of affordable rental units and income-eligible homeowner units.	\$1,493,821.68	6/30/2021	9	TBD
HOME Production of Affordable Housing		Production of Rental Units	Funds to be used for the construction of affordable housing in the Consortium	\$1,879,875.81	6/30/2021	4	TBD
HOME CHDO Operating Expenses	N/A	Production of Rental Units; Housing Rehabilitation	Funds for operational expenses for Community Housing Organizations operating in the WestMetro HOME Consortium.	\$124,001.60	6/30/2021	N/A	Administrative services and costs.
HOME CHDO Set-Aside	N/A	Production of Rental Units; Housing Rehabilitation	Funds for the creation and/or rehabilitation of affordable housing units by Community Housing Organizations operating in the WestMetro HOME Consortium.	\$292,413.06	6/30/2021	0	CHDO projects are determined by an annual HOME RFP generally released in the fall.
ESG20 Newton (FY21)	N/A	Homelessness - emergency shelter/transitional housing; Homeless - prevention, Homelessness - rapid re-housing	Funds for the City of Newton are planned to operate shelters for the homeless, conduct street outreach activities, promote rapid rehousing and provide homelessness prevention as well as support program administration.	\$167,734.00	6/30/2021	262	Activities will include shelter services and homelessness prevention as well as support program administration.

AP-50 Geographic Distribution - 91.420, 91.220(f)

1. Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

As the Community Development Block Grant (CDBG) is intended to predominantly serve low- to moderate-income residents, CDBG funding is allocated to projects that are either within CDBG eligible areas or to those that directly impact low-to-moderate income beneficiaries. However, in the FY21-26 Consolidated Plan, geography was not used to determine funding allocation priorities, nor were target areas identified in the city's Strategic Plan.

The city anticipates continuing to focus its investment in housing rehabilitation and development over the next program year to better address the escalating need for safe, decent and affordable housing. Affordable housing rehabilitation and development will directly benefit low-to-moderate income households, and accordingly, can be distributed city-wide. Approximately \$1,223,800 will be available to allocate on a rolling basis toward FY21 affordable housing projects.

2. Rationale for the priorities for allocating investments geographically

Given the increasing need for affordable housing, the city will be allocating the majority of its CDBG funds towards housing rehabilitation and affordable housing development during the July 1, 2020 - June 30, 2021 program year. These investments can be made city-wide to benefit low-to-moderate income households throughout Newton, rather than directed geographically towards specific target areas.

Affordable Housing

AP-55 Affordable Housing - 91.420, 91.220(g)

1. Introduction

In FY21 (FFY20), CBDG and HOME funding allocated to the City of Newton will continue to be used for a variety of programs and activities to preserve and expand affordable housing opportunities across the City. The Division seeks to identify projects that align with priority needs outlined in the FY21-FY25 Consolidated Plan and increase the stock of accessible and visitable housing. The City will continue to support the creation of nine units of permanent supportive housing for chronically homeless adults with disabilities. These units, along with 59 other affordable units for seniors, will be incorporated into the expansion of 2LifeCommunities' existing Golda Meir House, which already includes 199 units of affordable senior housing with extensive programming and services.

In September 2017, Newton issued a Request for Proposals for the reuse of the city-owned water tower site on Stanton Avenue, which directly abuts the Golda Meir House. In October 2017, the City chose to move forward with 2LifeCommunities' proposal and sell this publicly owned land to 2LifeCommunities in order to connect the old and new buildings into one vibrant affordable housing community. This new community will add approximately 68 one- and two-bedroom units through two additions. Approximately 50 of the units will be income-restricted, 8 will be unrestricted for seniors up to 60% of the Area Median Income, and nine of these units will be set-aside for chronically homeless individuals with disabilities.

Housing Division staff have played a crucial role in the progress of this project and will continue to oversee the development process on behalf of the City, particularly as it relates to ensuring the inclusion of the nine units for chronically homeless adults with disabilities. 2LifeCommunities received a Chapter 40B Comprehensive Permit from the Newton Zoning Board of Appeals in December 2018 and recently received a Low Income Housing Tax Credit award from the Massachusetts Department of Housing & Community Development (DHCD) and Section 202 funding from HUD. Construction is anticipated to begin in the Fall of 2020.

In FY20, the City awarded approval of CDBG funds to the Newton Housing Authority's (NHA) Haywood House project, which will create 55 new affordable rental units for seniors. The income eligibility will range from 30% AMI to up to 99% AMI. Three of the units will be fully accessible and four units will be designated for households that have been homeless or are at risk of homelessness. The project will also include two elevators and community space for supportive services. The NHA received a Comprehensive Permit in July 2018 and in February 2020 was awarded Low Income Housing Tax Credits from the Massachusetts Department of Housing & Community Development (DHCD), allowing construction to commence in early FY21.

In FY20 (FFY19), the Newton Housing Authority received funding approval from the City's Planning & Development Board and Community Preservation Committee to acquire and preserve the CAN-DO affordable housing portfolio of 33 units across 12 scattered sites in Newton. In 2018, CAN-DO disaffiliated from its management partner, Metro West Collaborative Development, placing the future of the portfolio in jeopardy. The City's Planning & Development Board voted to approve \$1,200,000 in CDBG funds to support the acquisition and rehabilitation of the portfolio. CDBG funds will be used to reduce the portfolio's existing debt and to fund capital needs improvements across the 12 sites. As the CDBG funding is pulling from FY19, FY20, and FY21 dollars, the Planning & Development Board approved a substantial amendment to the FY19 and FY20 Annual Action Plans and FY16-FY20 Consolidated Plan, as well as a conditional pre-commitment of FY21 funds. The preservation of this critical portfolio aligns with the priorities of the City's Consolidated Plan, as it serves some of Newton's most vulnerable households - extremely low- and low-income individuals who require a variety of supportive services.

Lastly, in FY21, the City of Newton will continue to explore the West Newton Armory site on Washington Street for the purposes of redeveloping the property as 100% affordable housing, possibly coupled with supportive services. The City Council has begun its Real Property Reuse Process to determine the ultimate use of the site, should the City purchase the property from the Commonwealth. Most recently, the City of Newton was awarded a \$200,000 Housing Choice Grant from the Department of Housing & Community Development (DHCD) to conduct a predevelopment feasibility study on the site, which was formerly operated by the National Guard and has since been vacant for over ten years. The City plans to hire an affordable housing development consultant team to conduct this detailed study. Should the City choose to purchase the site from the State for affordable housing, a Request for Proposals will be released in FY21 to identify an appropriate affordable housing developer to develop and manage the site.

In FY21 (FFY20), the City will administer programs that were successful in FY20 (FFY19) as well as develop and administer new programs which support housing opportunities in Newton:

- The City will make CDBG and HOME funds available for the rehabilitation and creation of new affordable rental units. A priority in FY21 will be assisting the NHA rehabilitate 33-units of the CAN-DO housing portfolio. In addition, the City will work to strengthen its relationship with existing housing providers in order to support diverse housing choices in Newton.
- Staff will continue to market and administer the Housing Rehabilitation program (Rehabilitation program), which provides homeowners and qualifying nonprofit organizations with deferred payment loans for repairs and improvements aimed at addressing issues related to health, safety, and building code violations. The Division anticipates that 28 units will be rehabilitated in FY21 (FFY20). Over the past year, the city has expanded the allowable scope of work available through the Housing

Rehabilitation program for the Newton Housing Authority and other nonprofit housing organization projects in order to more comprehensively address critical repairs for health and human safety. Previously, allowable work was limited solely to accessibility improvements. In FY21 (FFY20), the city will revise the Rehabilitation program guidelines to include existing accessory apartments and existing lodging houses that require repairs to ensure resident health, safety, and building code compliance. Expansion of the program will be in conjunction with the adoption of the Accessory Apartment Ordinance and the Lodging House Ordinance.

- In FY21, the city will continue working with the WestMetro HOME Consortium to update its WestMetro HOME Consortium Regional Fair Housing Plan. A consultant was brought on in FY20 to assist the City and Consortium in this effort and the plan is expected to be finalized in early FY21.
- The City will relaunch with its Zoning Re-Design project, an effort to rewrite and redesign the City's entire Zoning Ordinance. Objectives of this project as they relate to housing include incorporating Fair Housing requirements, definitions, and standards; directing multi-family and mixed-use development to transit and job-oriented locations; permitting a range of neighborhood scaled, multi-family building types; and strengthening the ordinance to better meet the vast and diverse housing needs of Newton today, including encouraging and supporting the development of more affordable units throughout the City.

Consortium Communities

The Town of Bedford plans to assist at least two households with HOME funded rental assistance in FY21. Bedford has several other active affordable housing projects. The Town is using \$3,000,000 in Bedford CPA funds to assist Preservation of Affordable Housing (POAH), a national nonprofit developer, with the preservation of 96 units of housing at Bedford Village. This development was originally funded through the State's 13A program, and the affordability restriction expired in March of 2018. The project includes the change of ownership of 447 Concord Road in Bedford, a HOME-assisted development. The Town is also supporting the Coast Guard property with the Pine Hills Crossing development through overlay zoning for the March 2019 Town Meeting. Bedford has commissioned a Housing Strategic Study to review current data and discuss future goals and strategies. The Town has 977 affordable units, with 18.36% of its housing included in the Commonwealth's Subsidized Housing Inventory (SHI).

The Town of Belmont expects The Bradford project will come online during FY21 (FFY20). This mixed-use project includes 112 units, 12 of these will be affordable, including two HOME-assisted units. The Town will bring forward a zoning by-law amendment to the 2020 Annual Town Meeting allowing for the development of 144 units at Zone 3 of the McLean District, which if approved and built, will provide 32 affordable units. Additionally, Bedford will continue to investigate housing development opportunities at several of its Housing Authority

properties. The Housing Trust has actively participated in moving these projects forward by conducting numerous public, educational meetings

In Brookline, The Harold and Ronald Brown Family House, a new project with a total of 62 new units of affordable rental senior housing will complete construction and begin occupancy during 2020. The project received financing through the State's Department of Housing and Community Development as well as a \$3 million in funds from the Town in locally controlled resources, including the Town's Housing Trust. A portion (\$807,028) of these funds is a mixture of FY17, FY18, and FY19 HOME funds and program income.

The Town of Brookline is also in the process of selecting a developer who can develop and manage a rental senior housing project (62+) at the Kent/Station Street Town-owned parking lot. The project will retain existing municipal parking on-site, while creating a range of approximately 40 to 65 age-restricted rental units for seniors. The project will underwrite affordable housing available to a range of incomes.

Brookline continues to process a number of 40B Comprehensive Permit projects which will add a significant number of affordable units to Brookline's housing stock. Since 2016, the Town approved eleven 40B projects containing a total of 728 rental units, of which 199 will be affordable to households earning 80% of AMI or less. Four additional 40B projects are in various stages of approval. These projects could add as many as 287 additional rental units, of which 71 would be affordable to households earning 80% of AMI or less. In addition, Brookline's Public Housing Authority continues its multi-year strategic preservation initiative that will rehabilitate and preserve its six federal housing developments (containing 438 affordable units) through the HUD Rental Assistance Demonstration (RAD) program, with state and local support.

Finally, the Town of Brookline continues to administer its Inclusionary Zoning Bylaw which applies to any project containing six or more newly constructed dwelling units. Currently five projects have been approved which are subject to this bylaw and will provide cash payments towards the Brookline Housing Trust. Two additional projects have been approved, which would yield approximately 16 on-site affordable rental units.

The Town of Concord has a history of supporting efforts to establish and maintain affordable housing. The Peter Bulkeley project was completed in FY18 (FFY17) and created four new units of senior housing. Concord is committing FY19 and FY20 and consolidated pool HOME funds for the Junction Village affordable assisted living facility project that will include 83 units of new construction overall, four of which will be HOME-assisted units. All of the units will be income-restricted. Junction Village received its Comprehensive Permit and a funding application was submitted to DHCD. It is anticipated that this project will be occupied in FY22 or FY23.

In FY21, the City of Framingham's Community Development Department will launch partnerships and initiatives that support the development and preservation of affordable housing. The Department maintains this practice to remove barriers for residents unable to

afford the rising costs of market rate units. For the next year, the city plans to prioritize HOME fund use for projects that provide service-enriched housing as well as decrease homelessness for families and individuals. Through this approach, the City then addresses the needs of low- and moderate-income residents coping with food insecurity, lack of transportation access, health care system entry challenges, and other issues.

The Town of Lexington has committed FY18, FY19 and FY20 HOME funds towards the renovation of five units owned by the Lexington Housing Authority at Pine Grove Village. Completion and occupancy of this project is expected in FY20. The Town has several other active affordable housing projects currently in process including units developed by the Lexington Housing Assistance Board (LEXHAB).

In FY21, the Natick Affordable Housing Trust will continue to fund a new Tenant Based Rental Assistance service offered by the Natick Service Council, first on a pilot basis, and, if warranted, on a permanent basis. The Trust will also explore partnering with a nonprofit to use HOME funds to start a critical Housing Rehabilitation program for income-eligible households.

Despite surpassing the state's 10% affordability goal, at 12.7%, the Town of Needham recently approved a 16-unit multi-family rental development at 1180 Great Plain Avenue, near the Town Center and public transportation, through the Chapter 40B comprehensive permit process. Four of the units will be affordable to those earning at or below 80% of Area Median Income with an even distribution of one and two-bedroom apartments. An abutter has appealed the ZBA approval which the developer is currently working to resolve.

Needham also approved a bylaw at its special fall Town Meeting to allow the creation of accessory apartments through a special permit process. While these units will not be eligible for inclusion in the Subsidized Housing Inventory, it is hoped that they will address some local housing needs. The Town is further hoping to attract affordable housing through zoning changes involving the promotion of mixed-use development in a business area along Highland Avenue and Route 128/95 as well as in its Neighborhood Business District.

The Town of Needham, through its Affordable Housing Trust, also received approval to introduce a Small Repair Grant Program to offer grants of up to \$4,000 to qualifying homeowners earning at or below 80% AMI to make health and safety related repairs to their homes. Town Meeting approved initial funding of \$50,000 from its general budget to fund the program.

The Town of Sudbury has a few projects developing for future years. The Coolidge Phase II began construction in FY19 with completion expected in FY21. Phase II will consist of 56 one-bedroom units restricted to households with at least one member who is at least 55 years old, of which two units will be HOME assisted. The Coolidge Phase I was a fully occupied 64-unit affordable rental development completed in 2014 that is also restricted to households with at least one member who is 55 years or older.

The City of Waltham Inclusionary Zoning Ordinance requires at least 10 percent of units in residential developments with eight or more dwellings to be affordable to households at 80% of the Area Median Income. The City Council is amending the Inclusionary Zoning Ordinance to provide for households at 50% and 60% of the Area Median Income. The rehabilitation of the Waltham Housing Authority's Beaverbrook Apartments has begun with a \$300,000 award for the roof replacement. The completion of the Cooperstreet project will provide 26 affordable one and two bedroom units to the City, with a lottery to be held in the Spring of 2020. The Zoning Board of Appeals has approved a 40B project on Second Avenue that will provide 49 affordable units to households at both 60% and 80% of AMI. Two additional 40B projects are currently in the approval process with the ZBA with anticipated approval in 2021.

Watertown will continue work to create the assessing, taxation financial infrastructure necessary to implement the Community Preservation Act, and to set up a CPA Committee. Strategy 2.2 of Watertown's 2014 Housing Production Plan recommends the Town "analyze industrial and Pleasant Street Corridor zoning districts to identify areas more appropriate for mixed use and/or multi-family development..." In 2015, the Town changed the zoning in the Pleasant Street Corridor to incentivize mixed use. In 2018, two mixed use apartment projects were approved in the Corridor by Special Permit.

The Town of Wayland will continue to make progress on efforts to sell River's Edge, a town-owned parcel on Route 20. The site represents an extraordinary opportunity in Wayland, with zoning in place to build 218 multi-family residential units in primarily three to four story buildings. The Wayland Planning Board sees this project as a unique opportunity to build attractive, higher density housing for which there is demand. The project also meets Commonwealth goals, including Smart Growth principles by transforming abandoned municipal industrial property into attractive affordable housing. Wood Partners was selected as the developer for this project through a public procurement process and the property received final permits in FY20. Additionally, the Town received a \$2.4 million MassWorks Grant for water infrastructure improvements for this project.

One Year Goals for the Number of Households to be Supported (By Population Type)	
Population Type	Number of Households
Homeless (units reserved for homeless individuals and/or households):	6*
Non-Homeless (for all units NOT reserved for homeless individuals and/or households):	87
Special-Needs (units reserved for households that are not homeless but require specialized housing or supportive services)	14
Total (Consortium-wide) >>>>	107

NOTE: Units that are acquired and rehabilitated are only reported once under either rehabilitation or acquisition

One Year Goals for the Number of Households Supported Through (By Program Type)	
Program Type	Number of Households
Rental Assistance (for programs such as TBRA and one-time payments to prevent homelessness):	57
The Production of New Units (construction of new units, including conversion of non-residential properties):	2
Rehab of Existing Units (including reconstruction):	47
Acquisition of Existing Units (for programs such as downpayment assistance):	1
Total (Consortium-wide) >>>>	107

NOTE: Units that are acquired and rehabilitated are only reported once under either rehabilitation or acquisition.

AP-60 Public Housing - 91.420, 91.220(h)

1. Actions planned during the next year to address the needs to public housing

In 2019, the Newton Housing Authority (NHA)'s social services program evolved into a new department called the Resident Services Department and hired another full-time social worker. This additional position will be another concrete step in growing and expanding the resident services within the NHA as an agency which will indirectly benefits the health and social welfare of the City of Newton community. In conjunction with CDBG funds and Perpetual Benevolent grant funding, the Resident Services Department aims to meet the changing needs of NHA's tenant population. In response to the societal shift toward aging in place, the department strategically develops programs that promote two core objectives: supporting healthy aging and building a sense of community within an environment of caring and dignity.

The Newton Housing Authority Resident Services Department promotes the objectives of healthy aging and community building by targeting its programming in the following three focus areas: reducing social isolation in older adults and persons with disabilities through recreational activities; providing activities focused specifically on health and wellness; and administering on-site staff clinical and case management support. Issues that have been addressed by the department include: eviction prevention, crisis intervention, social isolation, fuel assistance, loss of public benefits, referrals, and linkages to community supports.

In FY20, the City awarded CDBG funds to the Newton Housing Authority's (NHA) Haywood House project, which will create 55 new affordable rental units for seniors. The income eligibility will range from 30% AMI to up to 99% AMI. Three of the units will be fully accessible and four units will be designated for households that have been homeless or are at risk of homelessness. The project will also include two elevators and community space for supportive services. The NHA received a Comprehensive Permit in July 2018 and in February 2020 was awarded Low Income Housing Tax Credits from the Massachusetts Department of Housing & Community Development (DHCD), allowing construction to commence in early FY21.

Also in FY20 (FFY19), the Newton Housing Authority received funding approval from the City's Planning & Development Board and Community Preservation Committee to acquire and preserve the CAN-DO affordable housing portfolio of 33 units across 12 scattered sites in Newton. In 2018, CAN-DO disaffiliated from its management partner, Metro West Collaborative Development, placing the future of the portfolio in jeopardy. The City's Planning & Development Board voted to approve \$1,200,000 of CDBG funds to support the acquisition and rehabilitation of the portfolio. CDBG funds will be used to reduce the portfolio's existing debt and to fund capital needs improvements across the 12 sites. As the CDBG funding is pulling from FY19, FY20, and FY21 dollars, the Planning & Development Board approved a substantial amendment to the FY19 and FY20 Annual Action Plans and FY16-FY20 Consolidated Plan, as well as a conditional pre-commitment of FY21 funds. The preservation of this critical portfolio aligns with the priorities of the City's Consolidated Plan, as it serves some of Newton's most

vulnerable households - extremely low- and low-income individuals who require a variety of supportive services.

In addition to working with the Newton Housing Authority to acquire and rehabilitate this new 33-unit portfolio, the City will continue to work with the NHA to assess capital needs at all NHA properties and identify emergency and preventative maintenance needs as they arise. The CDBG Housing Rehabilitation program funds are also available as applicable for improvements and emergency repairs for eligible Newton Housing Authority properties.

Consortium Communities

In FY21 (FFY20), the Bedford Housing Authority will continue its social service program to connect families to the resources necessary to stabilize their living situation and improve their quality of life. The program will provide financial literacy education, skill training, career coaching, and other support services to a maximum of 15 low-income households currently residing in Bedford Housing Authority units.

Since its passage, Belmont Town Meeting has approved over \$1,000,000 in CPA funding for public housing projects, the majority of which was used to upgrade and renovate the existing developments. In FY21, the Town will investigate development opportunities at several of the Housing Authority properties with the expectation that additional units can be added.

In FY21, the Town of Brookline will continue working with the Brookline Housing Authority (BHA) on its multi-year Strategic Preservation Initiative. This project will take advantage of HUD's Rental Assistance Demonstration Program as well as federal and state tax credits and state and local subsidies, to rehabilitate and preserve 497 units of affordable public housing units in six different properties. In FY20 the BHA began construction on Phase 1, a 99 unit property serving low- and extremely low-income seniors (O'Shea). The BHA also obtained a preliminary funding commitment from the Town of \$1.35 million, including \$452,927 in FY20 HOME and program income funds, for the first of its Phase II projects, a 99-unit senior property at 90 Longwood Avenue (Morse).

In FY21 (FFY20) the Concord Housing Authority plans to continue working on the development of one unit of family rental housing under the Department of Housing and Community Development LIP Program on town-owned land.

Last year, the Framingham Housing Authority (FHA) announced plans for a major overhaul of its housing portfolio. Since then, the agency has been working to secure the necessary financing for the project. Once all funding is in place, the Community Development Department expects HOME funds to be among the many sources used to support this major rehabilitation initiative. Because some FHA sites are located in Opportunity Zones, there could be traditional and non-traditional investment streams used to finance this project.

In FY21 (FFY20) the Lexington Housing Authority will continue to proactively program capital

needs projects to ensure their portfolio of housing provides safe, stable, quality affordable housing for low and moderate income households.

The Natick Housing Authority (NHA) successfully rehabilitated the formerly vacant Coolidge House congregational housing project into individual dwellings for small households headed by persons with disabilities. Agency leadership is developing comprehensive renovation plans in concert with municipal staff and the Natick Affordable Housing Trust, using funds from a variety of sources. Attention is being focused on adding accessible units at the Cedar Gardens family housing development.

Though not yet ready for funding in FY21 (FFY20), the Town of Needham continues to work with the Needham Housing Authority (NHA) on plans to potentially modernize, redevelop existing properties or develop new units on NHA-owned property. The Town assisted the NHA to plan and facilitate three retreats to discuss these potential efforts in more detail. The Town also helped the NHA prepare a Request for Proposals to secure professional services to assess the feasibility of various projects through a facilities master plan. Needham is holding Community Preservation funds in reserve for the support of such a project. In coordination with Representative Garlick's office, the Town sponsored a special event for the new NHA Executive Director on August 2, 2019 to bring together and introduce public and nonprofit service providers who are available to work with the NHA in support of its tenants.

The Housing Division has begun the project scoping process with the Waltham Housing Authority for the HOME and CPA-funded rehabilitation of the Beaverbrook Elderly Apartments. The 59 unit complex rehabilitation will include the renovation of two, one-bedroom units into fully accessible apartments, a new roofing system, kitchen renovations, and ADA improvements site wide.

In Watertown, to ensure that applicants, tenants, and participants have meaningful access to services, programs and activities, the Housing Authority recently adopted and implemented a new Language Access Plan for those that may be limited in their English proficiency.

In FY21, the Wayland Housing Authority, working with Town, will be an active partner in administering the HOME funded TBRA program, providing security deposit assistance to income eligible households.

2. Actions to encourage public housing residents to become more involved in management and participate in homeownership

The Newton Housing Authority residents are involved in the Public Housing Authority Plan and capital needs identification process through annual tenant meetings and communication with

the Resident Advisory Board.

The Housing Authority does not participate in any homeownership programs. However, information about new homeownership opportunities created through the City of Newton Homebuyer Assistance program will be disseminated to NHA tenants.

Consortium Communities

The Bedford, Concord, Lexington, Needham and Sudbury Housing Authorities engage tenant groups to provide feedback on general administration issues and policy decisions

A new executive director was hired by the Belmont Housing Authority. The new director is reviewing existing policies and programs to see if there are additional opportunities for its tenants to become more involved and to move on to market rate housing. The Housing Authority meets regularly with its tenants to address various issues that arise from time to time.

In Brookline, as any affordable homeownership unit becomes available through turnover, the Town's Housing Division manages this resale process and engages in extensive outreach and a lottery process. Public Housing tenants interested in homeownership opportunities are notified through the Housing Authority or by signing up for the Town's affordable housing listserv. A number of public housing tenants have taken advantage of these opportunities in the past.

Brookline's town-wide tenant association provides ongoing support of the BHA's efforts to create and maintain quality housing, to strengthen social service programming, and increase self-sufficiency opportunities. The BHA works with the tenant association to foster communication with residents with respect to initiatives, policies and practices. The BHA encourages residents to become actively involved and to challenge BHA's management with independent ideas and concerns.

Depending on interest and resident availability, each BHA public housing site may have its own tenant association with a board elected by and consisting of residents. If there is not enough interest or availability for an official site-based tenant association, the residents can still plan site-wide social functions for the resident community, or to discuss such issues as BHA plans and policies, major repair projects, or other resident concerns.

The Framingham Housing Authority (FHA) offers various opportunities for its residents to become homeowners or participate in management that the Community Development Department fully supports. An example is FHA's Family Self-Sufficiency (FSS) program, which is a voluntary service that encourages FHA residents, both Section 8 and Public Housing, to work towards becoming financially independent by maintaining a savings account for five years. FSS diverts funds from rent increases into an account for the participant household. At the five-year mark, residents use the funds to accomplish a long-term goal, such as purchasing a home, paying for school or becoming debt free. The Community Development Department supports

FSS participating residents and other FHA residents by notifying them of homeownership, rental, employment, Section 3 and community development opportunities as well as committee meetings through various outreach outlets.

Waltham residents may participate in the management and operations of the Waltham Housing Authority (WHA). The WHA is required to have one of its residents sit on its Board of Governors. That person has one of five votes to determine policy and procedures for the WHA and presumably represents residents' interests in the decision-making process. Additionally, the WHA maintains a Resident Advisory Board, comprised of federal public housing residents and Section 8 participants. This Board meets twice a year to discuss proposed capital improvement projects and the application of federal funds. At these meetings, the residents have an opportunity to make proposals regarding the use of funds for the needs of the residents. Finally, the Board of Governors provides an opportunity for residents to address the Board at monthly meetings by setting aside some time on the agenda for discussion of resident issues. Resident associations are encouraged to attend the meetings and bring forward any residential community issues.

The Watertown Housing Authority has an active Tenant Association and Resident Advisory Boards (RABs) in the family and elderly developments. The Authority communicates all capital needs plans and operational issues to all the resident groups. The Authority is also a member of the Massachusetts Learning, Employment and Assessment Program to enhance resident employment and life skills.

The Wayland Housing Authority works to facilitate tenant participation in WHA operations. The WHA continues to encourage tenant participation in newsletters and the tenant handbook. Staff meets with tenant groups on a regular basis or as needed, and tenants serve on the WHA board.

3. If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Not applicable. No PHAs in the Consortium have been designated as "troubled."

AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i)

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:

1. Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Annually, the City of Newton convenes the local providers of the former BNWW CoC and representatives from the BoS CoC to discuss the needs of the homeless population and how ESG funds can be best allocated to address those needs. On December 6, 2019, the cohort finalized FY21 (FFY2020) ESG funding priorities across the five eligible components, including street outreach, emergency shelter, homelessness prevention, rapid re-housing, and HMIS.

Consistent with existing needs, HUD priorities, evaluation of ongoing programming, and recommendations from the CoC and local providers, Division staff allocated 33.5% of FY21 ESG funds towards homelessness prevention activities. Homelessness prevention has proven to be a successful and effective method to avert homelessness. With a combination of financial assistance and case management, not only do individuals and families stay housed but they are moving towards stability for the long term. Brookline Community Mental Health Center and Second Step will implement homelessness prevention activities for FY21.

Furthermore, while Division staff did not allocate FY21 ESG funds towards Street Outreach activities, the City of Newton and neighboring communities continue to build a strong network of resources to collaborate and ensure unsheltered individuals and families are engaged and connected to the services that they need. As a result, the City of Newton will continue to partner with the Community Day Center of Waltham (CDCW) to engage these unsheltered individuals. Under the Emergency Shelter component, the CDCW is awarded FY21 ESG funds to continue the operation of its day center, which provides a gathering space for individuals to receive a hot lunch, basic hygienic and medical needs, access to computers, case management, counseling, and referrals to detox facilities and other appropriate service providers. In addition, the City of Waltham's Public Health Department recently hired a social worker and substance abuse counselor to specifically target street outreach efforts within the community.

Consortium Communities

In addition to the work being done by the Community Day Center of Waltham, the City of Waltham's Public Health Department recently hired a social worker and substance abuse counselor to specifically target street outreach efforts within the community. The combined efforts made between the City of Waltham Public Health and Housing Departments, the Waltham Police Homeless Task Force, and the Community Day Center of Waltham provide outreach and an assessment of the needs of the homeless population, including unsheltered

persons. The Waltham Homeless Coalition, spearheaded by the police department, convenes monthly to share resources that are aimed at helping Waltham homeless persons. Annually, The City of Waltham allocates \$100,000 for a winter Warming Center for unsheltered homeless who cannot qualify for Massachusetts Housing & Shelter Alliance (MHSA) services due to substance abuse and or criminal activity. The Waltham Police Homeless Task Force works to build trust with homeless persons, performs assessments in the field and links them to shelter and supportive services that meet their needs. The shelters administered by MHSA in Waltham provide overnight shelter, meals and bathroom/shower facilities while engaging homeless persons in case management to work towards permanent housing.

Needham will continue to refer anyone looking for an emergency shelter to appropriate locations such as shelters located in nearby municipalities. The Town's community housing specialist can provide additional support in answering inquiries and supplying important information and referrals. The Needham Housing Authority will also continue to assist people who may be homeless or at risk of homelessness in their search for affordable housing opportunities and support services, prioritizing these households for occupancy in its developments.

2. Addressing the emergency shelter and transitional housing needs of homeless persons

The United States Interagency Council on Homelessness and the BoS CoC have established strategic goals to end and prevent homelessness, particularly among the veteran, family, youth, and chronically homeless populations. Division staff utilizes ESG funds to support various shelter services, including those for survivors of domestic violence and men's and women's emergency shelters.

The Second Step, REACH Beyond Domestic Violence, and the Middlesex Human Service Agency provide critical emergency and transitional housing for the BNWW region. ESG funds are also awarded to the only day shelter in the Waltham, Community Day Center of Waltham (CDCW). As previously mentioned, the CDCW provides a gathering space for individuals to receive a hot lunch, basic hygienic and medical needs, access to computers, case management, counseling, and referrals to detox facilities and other appropriate service providers.

This ESG funding source serves as a valuable resource for these emergency shelter providers, especially since these types of projects are not eligible to receive McKinney-Vento Act funds. In addition, it is critical to support these emergency and transitional shelters as few exist in the BNWW region. Most other shelters are located in Boston, which is a far travel for many homeless individuals and families. Without these emergency shelter providers in the BNWW region, many homeless individuals and families would be otherwise unsheltered. Lastly, the Pine Street Inn, though not funded by ESG, also operates several projects within the BoS CoC and manages an experienced outreach team that engages those unable or unwilling to enter a shelter. Pine Street Inn staff provides these individuals with referral information, food, clothing, hygiene products, and blankets.

On January 24, 2020, the BoC CoC, in coordination with several agencies from the former BNWW CoC, completed the 2020 Point-in Time Count (PITC). Although there is a clear need and benefit of providing shelter services, Division staff continues to strike a balance in allocating ESG funds between emergency shelter, homelessness prevention, and rapid re-housing activities, which can help reduce the number of individuals and families experiencing homelessness and the duration of the homelessness. The BoS CoC must strive for permanent housing stability in order to effectively end homelessness.

Consortium Communities

The Natick Affordable Housing Trust established an Emergency Homeless Voucher program for those homeless who are on the streets during inclement weather and need shelter. The voucher program provides for several nights of housing in a local hotel with the condition the individual seek assistance from the Natick Service Council. The recipients of the voucher are usually picked up and assisted first by the Natick Police, who gather information, run a background check, notify Natick Service Council, and provide a ride and the voucher to a local motel. The Service Council will pick up the voucher recipient the next day for further assistance.

The City of Waltham focuses resources on providing rapid rehousing services when possible, to decrease the number of unsheltered people who are unable to reside in the current transitional shelter beds in the City, due to substance abuse and or criminal behavior. The HOME TBRA program can bridge the homeless individual into public housing by providing a rental subsidy based on the Waltham Housing Authority rent standard. The Community Day Center, the Waltham Police Homeless Task Force and the City Health Department Outreach worker collaborate to refer homeless individuals to the TBRA Program and maintain a proactive approach in providing continued support for the client.

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

ESG funds continue to be allocated toward homelessness prevention and rapid re-housing activities to assist homeless individuals and families and those who are at-risk of homelessness in the BNWW region. Homelessness prevention and rapid re-housing activities stabilizes individuals and moves them towards permanent housing and independent living. Activities include rental assistance (short- and medium-term rental assistance), financial assistance (rental application fees, security deposits, last month's rent, utility deposits, utility payments,

moving costs, and services (housing search and placement, housing stability case management, mediation, legal services, and credit repair).

In addition, in July 2019, the City of Newton’s City Council passed the updated Inclusionary Zoning Ordinance, which includes the Extremely Low-Income (ELI) Alternative Compliance Option. The ELI option allows a developer to seek a special permit to reduce its total percentage of required Inclusionary Units. Under the new Inclusionary Zoning Ordinance, any project that includes the construction of twenty-one (21) or more new rental units must set aside 17.5% of its total units as affordable units (including 2.5% middle-income units). However, the developer may seek a special permit to alternatively set aside 12.5% of its total units as affordable units under the ELI option.

To undertake the ELI option, the developer must provide and cover all costs associated with providing ongoing, regular on-site support services for households residing in the ELI units, which are set at 30% AMI. The ELI option is a result of the City of Newton’s emphasis on creating permanent affordable housing with supportive services to ensure the City’s most vulnerable population is stably housed, has increased economic security, and improved health.

The following table details the breakdown of the 12.5% affordability requirement under this ELI option:

Extremely Low-Income Alternative Compliance Option: Number of Inclusionary Units Required	
Tier Level	21+ UNITS
ELI Tier: 30% AMI	2.5%
Tier 1: 50%-80% AMI	7.5%
Tier 2: 110% AMI	2.5%
Total	12.5%

Source: City of Newton’s Zoning Ordinance, Chapter 30

Consortium Communities

The Natick Affordable Housing Trust has been meeting with Family Promise, a regional transitional housing organization, for the last year. Both organizations have been reviewing means in which the Housing Trust can assist Family Promise to provide rental assistance or rental units for Family Promise clients, primarily homeless families in need of transitional housing. The Housing Trust is also reviewing the possibility of using HOME funds for Tenant Based Rental Assistance that could be provided to several income levels, including those families transitioning from homeless assistance to more independent living.

Needham will promote mixed-income housing development to serve the range of needs for assisted housing. This will likely include several income tiers in new rental developments, including units for those earning at extremely low and very low-income levels and thus affordable to those who may be homeless or at risk of becoming homeless.

Waltham will continue to refer very -low income individuals and families to social service agencies that maximize rapid re-housing services to shorten the length of time persons experiencing homelessness stay in emergency shelters. The rapid rehousing programs provide case management to give households the opportunity to access any services needed in order to retain permanent housing.

The Waltham Housing Department continues to administer the Municipal Housing Trust Emergency Assistance fund to provide financial support for those who may be facing eviction due to non-payment of rent and or rent arrears. The Housing Department also coordinates with the Department of Transitional Assistance for Residential Assistance for Families in Transition (RAFT) funding to maximize the amount needed to obtain permanent housing with security deposit payments, first and last month rent payments and moving expenses. Removing the barrier of the upfront costs needed to obtain permanent housing continues to be an ongoing need for Waltham citizens.

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

Since FY16 (FFY17), the City of Newton has increasingly targeted its ESG allocation towards homelessness prevention programs, from 23% to FY21's allocation of 34 percent. The funds are intended to prevent low-income individuals and families from moving into emergency shelters or living in a public or private place not meant for human habilitation. Funds can be utilized for rental assistance (short- or medium-term rental assistance), financial assistance (application fees, security deposits, last month's rent, utility deposits, or moving costs), or service costs (housing search and placement, legal services, or credit repair). The City of Newton continues to target its ESG funds towards homelessness prevention programs and collaborate with the McKinney Vento Liaison to ensure low-income individuals and families are receiving the support that they need to avoid homelessness. Furthermore, the City will continue to facilitate referrals between ESG providers to non-ESG providers to ensure resources are available to all in the jurisdiction.

The Natick Service Council helps low income families, including eviction prevention services, emergency utility assistance, and financial assistance for school, camp, and other children programs.

The City of Waltham HOME Tenant Based Rental Assistance full rental assistance program provides monthly subsidy rent payments to individuals, at risk elderly, battered families with

referrals from local social service agencies, such as the Community Day Center, Newton Wellesley Hospital, the Council on Aging and the Waltham Housing Authority. The Municipal Housing Trust Emergency Assistance Fund assists households in Waltham who are at risk or may be near homeless. Households facing eviction who are able to pay rent moving forward, but need assistance with rent arrears, may apply for funding that prevents eviction and keeps them permanently housed. The Housing Department coordinates with the Department of Transitional Assistance to help facilitate emergency Residential Assistance for Families in Transition (RAFT) funding, to be used in conjunction with Waltham funds for households with dire circumstances.

In FY21 the City will support several affordable housing projects that target the special needs population. CDBG funds will be used in the development of the Newton Housing Authority's Haywood House which will consist of 55 one-bedroom rental apartments, of which 32 units will be affordable to elderly households at or below 60% AMI. Three of the units will be fully accessible for people with disabilities and four units will be designated for households that have been homeless or are at risk of homelessness. The project will also include two elevators and community space for supportive services. This City continues to support 2LifeCommunities' expansion of the Golda Meir House. This new community will add approximately 68 one- and two bedroom units through two additions. Approximately 50 of the units will be income-restricted, 8 will be unrestricted for seniors up to 60% of the Area Median Income, and nine of these units will be set-aside for chronically homeless individuals with disabilities. It is anticipated that the City's federally-funded, affordable rental unit project at 236 Auburn Street will be complete. This project also includes the construction of a 5-bedroom congregate home for developmentally disabled adults at or below 30% AMI.

Across the Consortium, Tenant-Based Rental assistance and housing rehabilitation programs will target non-homeless special needs households. It is anticipated that 57 households will be assisted through Tenant Based Rental Assistance programs in Bedford, Framingham, Natick, Waltham and Wayland. HOME and Community Preservation funds will be used to renovate 59 Waltham Housing Authority elderly housing units at Waltham's Beaverbrook Elderly Apartments; two of the existing units will be made fully accessible. Finally, deferred payment loans offered by the Housing Rehabilitation programs in Newton and Framingham enable homeowners to complete health and safety repairs and improvements, which provides an opportunity for many elderly residents to age in place.

AP-75 Barriers to affordable housing - 91.420, 91.220(j)

- 1. Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

As in many other communities throughout greater Boston, one of the biggest challenges to the development of affordable housing in Newton is the zoning ordinance. While reasonable regulation of new development is important and to be expected, it is essential that the city closely examine its ordinances for potential obstacles to affordable housing development. Particular zoning and other city policies that have the potential to limit affordable housing include the following:

- Existing multi-family permitting processes. In Massachusetts, either a special permit or a comprehensive permit under Chapter 40B is typically required to create any multi-family housing (i.e. more than two units). These processes are often-times controversial and add time and cost to developments that could otherwise more easily create affordable housing units.
- Accessory apartment zoning. Accessory apartments are often more affordable to rent because they tend to be smaller, but the process for approval of these units is complicated and typically requires a special permit. It is estimated that there are 1,000 illegal accessory apartments in the city, all of which have not been properly inspected for compliance with the Massachusetts State Building Code and may pose serious health and safety concerns for occupants. Recently the city's zoning ordinance was amended to streamline the permitting of illegal accessory apartments that can be proven to be pre-existing from 1999, if they can be made code compliant. In April 2017, the city adopted the Accessory Apartment Ordinance which allows internal accessory apartments by-right in all Newton single and two-family homes.
- Lodging House Zoning Ordinance. In a lodging house, the lodger rents a rooming unit that is typically a bedroom, including a seating area. The lodger has access to, but not responsibility for, shared cooking and bath facilities with others in the house. They rent their rooming unit directly from the lodging house operator, who maintains the common areas, including the kitchen and bath. A lodging house tends to offer a more affordable living situation than a traditional rental apartment. In 2018, the city passed a new lodging house amendment, making lodging houses an allowed use by special permit in all multi-family districts of the city. As part of the zoning amendment process, the city developed a proposed set of standards by which to regulate not only the formation of a lodging house, but also the continued operation of a lodging house. The new lodging house amendment specifically allows lodging houses above-ground in BU1, BU2, BU3, BU4, MU1, MU2, MU3, and MU4 districts.

- Procurement policies. The city’s procurement policy for affordable housing projects that utilize CDBG and HOME funds can increase overall project costs and the upfront time required to develop plans and specifications. The city may explore changes to the policy that could mitigate this barrier while ensuring fair and open competition.

In recognition of these existing barriers to the development of affordable housing, Division staff, along with staff in the Long Range Planning Division, intend to focus on the following programs and topic areas in the upcoming year.

Zoning Reform

In FY21 (FFY20), the city intends to revise its zoning to increase permitting flexibility and development incentives for affordable housing. Potential zoning revisions include: adopting controls which are less reliant on special permits or 40B approvals; facilitating both new development and the adaptation of existing housing to better serve needs of older and disabled residents; rewarding the provision of more affordable housing than the required share of affordable units, or rewarding developments incorporating such provisions as “accessibility” and “visitability.” These measures will build on the city’s efforts to further support housing choice in Newton.

The city will continue to seek additional regulatory changes in FY21 (FFY19) through its Zoning Redesign Project. Zoning Redesign was initiated in 2011 and Phase One of the project was completed in 2015. The initial phase successfully reorganized the existing ordinance, making it easier to understand and interpret.

Phase Two of the Zoning Redesign Project will create a new, context-based zoning ordinance that provides guidance and rules for the development and redevelopment of land in Newton. Context-based means the new zoning will sustain the city’s existing development forms, reflect the building patterns of Newton’s different neighborhoods and village centers, and allow new growth to occur in appropriate places and at appropriate scales. The Zoning Redesign Project intends to bring more predictability to land use regulation and the permitting process.

Objectives of this project as they relate to housing include incorporating fair housing requirements, definitions, and standards; directing multi-family and mixed-use development to transit and job-oriented locations; permitting a range of neighborhood scaled, multi-family building types; and strengthening the ordinance to better meet the vast and diverse housing needs of Newton today, including encouraging and supporting the development of more affordable units throughout the city.

Expansion of the Homeowner Rehabilitation Program

Over the past year, the city has expanded the Housing Rehabilitation program to better assist residents residing with the Newton Housing Authority and other nonprofit housing organization projects. Previously, allowable work was limited solely to accessibility improvements, but now

permit projects to more comprehensively address critical repairs for health and human safety. The city will also expand the Housing Rehabilitation program to existing accessory apartments and lodging houses that require repairs to ensure resident health, safety, and building code compliance. The Housing Rehabilitation program guidelines will be revised in conjunction with the adoption of the Accessory Apartment Ordinance and the Lodging House Ordinance. Rental income from accessory apartments can help low- and moderate-income owners make mortgage payments and also offer “naturally affordable” small housing units for low- and moderate- income renters, which is identified in the FY21-25 Consolidated Plan’s Needs Assessment as a means toward encouraging diversity in the city’s housing stock.

Fair Housing

Actions anticipated for addressing concerns regarding fair housing include the following:

- The City, as representative member of the WestMetro HOME Consortium, selected a consultant to develop the Consortium’s new FY21 – FY25 Analysis of Impediments to Fair Housing Choice (AI). Since it will address fair housing barriers throughout all of the 13 member communities in the Consortium, it will help Newton identify actions, policies, or decisions that have or may restrict an individual’s housing choice on account of race, color, religion, gender, gender identity and expression, disability, familial status, national origin, ancestry, age, marital status, source of income, sexual orientation, veteran/military status and genetic information. In addition, the AI must address any identified barriers to facilitate inclusive, equitable communities that provide free and open access to housing and opportunity. The final AI will culminate in meaningful action steps that Newton and the Consortium may take to overcome identified fair housing barriers, coinciding with timetables for implementing new practices with measurable results.
- The city continues to advance the redesign of its current zoning ordinance, the most comprehensive revision to its zoning in decades. Division staff and the Fair Housing Committee (FHC) will actively ensure that proposed zoning changes support the city’s goal to affirmatively further fair housing and avoid creating disparate impacts to protected classes.
- As the deadline for submission of Assessment of Fair Housing has been suspended, the city and WestMetro HOME Consortium will embark on the development of the 2021-2025 Regional Analysis of Impediments. Consistent with the Fair Housing Act and Fair Housing Planning Guide, the city, in combination with the HOME Consortium and FHC, will conduct an updated Analysis of Impediments to Fair Housing Choice (AI) that will outline meaningful actions to overcome the effects of identified impediments.
- The city seeks to ensure that consideration of fair housing goes beyond regulatory minimums in order to implement the city’s documented fair housing development goals and objectives. The Fair Housing Committee assisted the city in developing the Fair

Housing Project Consideration Tool for staff to utilize during project review. The tool goes beyond the reach of regulatory measures as city staff evaluate applicable housing development projects for consistency with fair housing goals and policies as outlined in the FY21-25 Consolidated Plan. All evaluations will result in a statement that “the objectives of the city’s Consolidated Plan, including fair housing, have been considered in this review.”

- Information designed to guide the public and developers on the process for developing affordable housing and Comprehensive Permit projects in Newton will continue to be available on the Planning and Development Department website. The webpage details the city’s fair housing policy and obligation to affirmatively further fair housing.
- The city’s Fair Housing Statement is posted on its website. This Statement is also available in written documents through city departments, venues, sponsored events, activities targeting abutters of pending development, and zoning related actions affecting housing. At community meetings related to pending housing developments, the city will continue to inform the public of the city’s responsibility to affirmatively further fair housing, disseminating in writing, the City of Newton’s Fair Housing Statement. The city will include the US Department of Housing & Urban Development’s (HUD) Fair Housing logo on all pertinent housing documents.
- The city and FHC will continue efforts to plan for informative and meaningful fair housing programming, striving for a minimum of one event and one outreach campaign annually. Training will be provided on an annual basis to city councilors, city staff, community partners, the general public and others involved in activity related to the provision of housing. Presentations may include a variety of topics such as disparate impact and fair housing principles. Additional events and outreach will be undertaken if circumstances support these efforts.
- The city’s fair housing complaint process is driven by the Newton Human Rights Commission. The Human Rights Commission is authorized under the City of Newton Ordinance to consider claims of discrimination related to housing in Newton that are filed within 300 days of occurrence. The Commission acts as a neutral party which receives and investigates complaints, and ensures proper referrals, if necessary. Complaints can be filed to the Commission in person, through an online discrimination reporting tool, or in written form. The city, and Division staff are working to improve and streamline this tool for increased accessibility, once finalized, city staff and the FHC will promote this resource, particularly to individuals and families of protected classes, in an effort to report and stem potentially discriminatory actions. Division staff will also encourage nonprofit housing providers to report similar acts of discrimination and enforce responsiveness consistent with city policies to address discriminatory matters.
- Additionally, the city progresses on efforts to create nine units of restricted permanent

supportive housing for chronically homeless adults with disabilities. The priority parcel, 160 R Stanton Street successfully underwent the city's disposition and procurement process. The developer, 2Life Communities, formerly Jewish Community Housing for the Elderly, conducted an extensive public engagement process to expand the 199 units of affordable senior housing at Golda Meir with 68 new affordable rental units. The project received its Comprehensive (40B) Permit and has been awarded LIHTC from the Commonwealth of Massachusetts and a Section 202 award from HUD. Construction is slated to commence in the Fall of 2020.

Consortium Communities

In FY20, Belmont amended its Inclusionary Housing By-Law by lowering the threshold requirement for affordable units and eliminating exemptions for mixed-use developments. In FY21, the Town will continue to reduce legislative impediments by presenting a zoning bylaw amendment to Town Meeting to allow 144 units, 32 affordable units at Zone 3 in the McLean District. The Town will also continue to look for other housing development opportunities, such as redevelopment of several Housing Authority properties.

The towns of Bedford, Concord, Lexington, Sudbury and Wayland encourage local affordable housing initiatives through zoning changes and the adoption of inclusionary zoning provisions. The ability to access other local funds such as Community Preservation Act (CPA) and Housing Trust funds helps overcome the high cost of development. In addition, these communities support local housing authorities in their efforts to expand their portfolio with additional units.

There are four areas of focus to make affordable housing more accessible to the residents of Brookline:

- **Regulatory:** The Brookline Zoning Bylaw includes provisions to increase affordable housing through an inclusionary housing ordinance. Brookline will continue to use its zoning bylaw proactively to encourage affordable housing as part of market-rate projects through the inclusionary zoning provision.
- **Resource Allocation:** Brookline acts as a partner by matching fiscal resources and technical assistance to facilitate new affordable housing development town-wide. The Town will continue to use its own Housing Trust as a way to help write down high property and land costs associated with affordable housing development. The Brookline Housing Authority properties are on a "PILOT" (payment in lieu of taxes program that exempts the entity from paying real estate taxes on its affordable housing properties under state statute).
- **Education, Consultation and Advocacy:** The Brookline Housing Advisory Board is fundamental in promoting the preservation and creation of affordable housing. It studies and provides guidance to town staff and boards regarding Brookline's housing needs, policies, programs, and zoning tools.

- Local Planning and Policy: The Town is a strategic partner in pursuing public-private partnerships that foster affordable housing development in key strategic locations town-wide. Brookline assists the Brookline Housing Authority in numerous projects involving construction or repairs projects, major construction and renovation projects as well as smaller repair and replacement projects. Many other affordable housing development projects are funded with State programs, and the Town usually matches fiscal resources and technical assistance to facilitate new affordable housing development.

Over the past 15 years, Framingham enacted several laws to increase the affordable housing stock with an inclusionary zoning bylaw and redefinition of the central business district to include multi-family housing and transit orientated development. Currently, residents are mobilizing to bring Community Preservation Act (CPA) funding into the community. As a result, the department anticipates forming some crucial partnerships that will leverage HOME, CDBG, CPA and other funding to expand community affordable housing development.

Natick will enforce a new Inclusionary Zoning for Affordable Housing section in the Town's zoning bylaw. This revolutionary new regulation requires affordable housing in any development yielding two or more net new dwellings. The Natick Affordable Housing Trust will use funds and/or land generated by Inclusionary Zoning to develop affordable housing in the town and continue to seek additional local funds from the Community Preservation Act to help overcome the high cost of development. Finally, the Trust will continue supporting the Natick Housing Authority in preserving their existing inventory and expanding their portfolio with additional units. In 2020, the Natick Planning Board is looking to modernize cluster development regulations in the town's zoning bylaw to encourage the development of more efficient residential subdivisions with a greater range of housing sizes and types.

Needham continues to look for opportunities to develop affordable housing as part of redevelopment efforts in locations that have previously been zoned solely for business purposes. For example, the Town approved mixed-use zoning in an area along Highland Avenue in close proximity to Routes 128/95. It also approved changes to the Neighborhood Business District bylaw that would allow housing and mandate the inclusion of affordable housing or cash in-lieu of units. Another bylaw change was to allow accessory dwelling units, previously not permitted.

While over the 10% state affordability goal under Chapter 40B, at 12.7%, Needham has continued to approve affordable housing development including a recent approval of 16 rental units in a multi-family structure at 1180 Great Plain Avenue, close to the Town Center. This project will include four affordable units evenly split between one and two-bedroom apartments. Additionally, the Town is revisiting local Chapter 40B Guidelines that it prepared in 2012 to steer development to appropriate locations and take advantage of the "friendly 40B" process available through the state's Local Initiative Program (LIP). These Guidelines will be revised in the near future.

Waltham will continue to operate the HOME-funded Tenant Based Rental Assistance Program with a focus on the city's chronic homeless population to transition this population into stable, permanent housing. With little or no income or assets, poor credit records, mental health issues and no shelter resources available in surrounding communities, Waltham's goal is to strengthen and support local homeless support agencies. These organizations assist the homeless with, job training, counseling, and other service assistance so participating individuals can develop financial independence and self-sufficiency.

The Assessor's Office actively identifies affordable home ownership units in Watertown, and affirmatively chooses to keep the town's assessment of these units affordable. Watertown Housing Partnership continues to strongly advocate for affordable housing, and a zoning amendment was passed in 2018 to allow assisted living facilities in more areas of town. The town adopted the Community Preservation Act in the fall of 2016. Some of the funding from this local tax is expected to be used to create additional affordable housing.

AP-85 Other Actions - 91.420, 91.220(k)

1. Actions planned to address obstacles to meeting underserved needs

Please refer to section AP-35: Projects.

Consortium Communities

Many of the Consortium communities will continue to work with staff, developers, consultants, and property owners to look for affordable housing development opportunities.

Every year, the City of Framingham sponsors the work of local nonprofits as part of its poverty alleviation strategy. The sponsored agencies' mission range from food security for homeless and low/mod residents to ESL classes for new immigrants adjusting to life in the United States. This strategy partially hinges on close collaboration with town departments and community organizations. Such close collaboration has resulted in referrals to the Tenant-Based Rental assistance program by local agencies and by CD staff to resources for food, literacy, non-TBRA rental assistance, after-school programs or the possibility of homeownership.

The Natick Affordable Housing Trust and Community & Economic Development Department is exploring use of town funds to augment federal HOME monies to assist the Natick Service Council's new Tenant Based Rental Assistance program. Local resources can be used more flexibly and quickly in this program, allowing it to serve a greater number of clients with a wider array of housing problems.

The City of Waltham will continue to support the Waltham Housing Authority (WHA) with HOME funding to provide a resource for rehabilitation of aging units. By leveraging Community Preservation funds the City and the WHA are able to make substantial improvements to Housing Authority units with an emphasis on improving ADA accessibility.

2. Actions planned to foster and maintain affordable housing

In FY21 (FFY20), the Newton will pursue a number of strategies to preserve and maintain existing affordable housing units, including administering a Downpayment/Closing Cost Assistance Program to support the resale of existing deed-restricted homeownership units to low-income households; ensuring that rehabilitation and development funds are available to nonprofit owners of affordable housing to preserve the physical integrity of the city's affordable housing resources; and bolstering partnerships and collaborations with community organizations and non-profit housing developers.

Consortium Communities

The Town of Belmont will use HOME administrative funds to put together a state housing grant to investigate the redevelopment of several Housing Authority properties. The Housing Trust will continue to seek CPA funding to enable the Trust to respond quickly to housing opportunities that arise from time to time. This fund allows the Housing Trust to conduct

various pre-development activities without going through the municipal funding process.

The Town of Bedford is assisting the Preservation of Affordable Housing to preserve 96 units of housing at Bedford Village with \$3,000,000 in Bedford CPA funds. This development was originally funded through the State's 13A program, and the affordability restrictions expired in March 2018.

For over a decade, the City of Framingham bolstered affordable housing development and preservation through legislation and partnerships. Next year, the City will continue to use a mix of tools, such as municipal funding, inclusionary zoning, the Community Preservation Act, as well as HOME and CDBG funds, to foster and maintain affordable housing. In FY21, the department will tap into the resources of MassHousing, MassDevelopment, the Massachusetts Housing Investment Corporation, the Massachusetts Housing Partnership Fund and the Community Economic Development Assistance Corporation to apply new ways of contributing specialized equity, lending and/or technical assistance to new-sponsored projects.

The Town of Natick recently started annually appropriating local revenues (\$80,000 per year) for the Natick Affordable Housing Trust to provide and preserve affordable housing for needy households in the town. The Trust is also considering proposing new real estate transfer taxes to Town Meeting in 2020 to help fund affordable housing development.

The Waltham Housing Division will continue to administer the Housing Trust Emergency Assistance Program for residents who cannot afford to stay in their homes. By providing assistance to households that are at risk of eviction and facing displacement, the program helps families avoid the negative social and health consequences of displacement. These include the disruption of social networks, risk of living in overcrowded conditions, extremely long commutes, and even homelessness.

3. Actions planned to reduce lead-based paint hazards

Newton's Housing Rehabilitation program currently uses CDBG funding to provide grants to income-eligible homeowners to remove lead-based paint, asbestos, and other health hazards. The program also offers these homeowners zero-interest deferred payment loans to fix building and safety code violations. This successful program will be continued in FY21 (FFY20).

As noted in the Needs Assessment and Market Analysis and the Strategic Plan Chapters of the FY16-20 Consolidated Plan, the reported incidence of lead poisoning is low in Newton and surrounding communities. However, over 80% of housing in the Consortium was built before 1980, therefore a majority of those units are presumed to have lead hazards. As a result, the City will continue to make lead paint abatement and the removal of asbestos and other such health hazards a priority in the Housing Rehabilitation program.

These specific lead-based paint hazard prevention and remediation activities are incorporated into the city's housing policies and procedures. The city's Housing Rehabilitation program is marketed to income-eligible homeowners and/or landlords with more than 50% income-eligible tenants to ensure suitable safe living conditions, which is one of the primary tenets of the CDBG program. In addition, once a rehabilitation application is accepted, the city's Housing Rehabilitation and Construction Manager walks through the entire house with the homeowner, not just the area identified by the applicant as needing repair. In this way, staff is able to identify and remediate all unsafe or unhealthy living conditions. Often the issues identified are mental health related (i.e. hoarding, dementia etc.) as well as general physical disrepair. In these cases, the homeowner can be referred to a social service agency whose staff can appropriately address those other needs as well.

Consortium Communities

Many of the Consortium communities cited MassHousing's *Get the Lead Out* program as an option for residents. For all of the Consortium communities, new affordable construction is free from lead paint.

Lead-based paint and other hazards are managed by the Brookline's Health Department Division of Environmental Health. Lead hazards are treated as a violation to State Sanitary Code, and the Division implements regulations and requirements for lead removal, abatement and containment. The Massachusetts Lead Laws are followed, and contractors are required to comply with State's requirements of safe practices for renovation and lead abatement. The City refers constituents in need of lead abatement to Mass Housing agencies in charge of administering the Get the Lead Out Program, such as Urban Edge. Households with a child under 6 years of age can request an inspection by the Brookline Health Department. In Brookline projects funded with CDBG and HOME funds, the environmental review analysis will disclose the presence of toxic substances such as lead and asbestos, and in many cases, it discloses to the public a mitigation plan if the new construction or rehabilitation of housing may involve dealing with such toxic substances.

The Regional Housing Service Office ensures that all HOME funded projects and programs in Bedford, Concord, Lexington, Sudbury, and Wayland comply with the applicable lead laws and regulations. This includes measures to verify that households receiving Tenant Based Rental Assistance funds meet applicable requirements and development or renovation projects have completed environmental reviews prior to committing funds.

Framingham addresses lead hazards through the City's rehabilitation program. If there is a child under 6 living in the household and the project meets the funding threshold, the city will conduct a lead inspection. If lead hazards are found the City will include lead remediation as part of the scope of work. Lead safe work practices are required for all projects, even those that do not involve lead remediation.

While Needham has a Health Department staff person who has a Lead Determinator License from the state, the Town rarely receives complaints about the existence of lead-based paint in homes and typically refers complaints to the MA Lead Poisoning Prevention Program/Childhood Lead Poisoning Prevention Program. The Town also provides information to residents on lead-based paint issues through a section on the Town's housing website, a housing brochure, and referrals to the state's "Get the Lead Out" Program for financial assistance on lead-based paint removal. Moreover, as part of the demolition permitting process, the Town requires that all builders hire a water truck to be present on site throughout the demolition process to spray down any dust plumes that may occur to prevent potential airborne hazards from migrating onto other neighboring properties.

The Waltham Housing Department administers the CDBG-funded lead paint program to income eligible homeowners and or to landlords who have low to moderate income tenants. Owners or tenants must be within the HUD income guideline at or below 80% of the AMI. If owners and/or tenants are above the income requirements they are referred to Mass Housing Loan programs. Even with resources for remediation, landlords can carry a significant financial burden for lead removal, which makes them less likely to address the issue. In addition, federal and state support for lead removal is limited and conditional; not every house receives federal or state funds for full abatement.

Watertown's Social Services Coordinator and local nonprofit Metro West Collaborative Development provide information about lead based paint to households as requested. All HOME assisted units are certified lead-free.

4. Actions planned to reduce the number of poverty-level families

One of the priorities of the Housing and Community Development Division is to fund programs and services for poverty-level individuals and families. According to the 2010-2014 ACS, the City of Newton had 5.6% of its population living below the poverty level, representing 4,463 individuals. Compared to the 2013-2017 American Community Survey (ACS) 5-Year Estimates, 4.3% of individuals in Newton are living below the poverty level, representing 3,462 individuals. This figure is a 1.3% decrease from prior year's data. The following is a breakdown of individuals living below the poverty level by age group and the 2018 and 2019 poverty guideline.

Newton Population by Age Group	2013- 2017 ACS Estimate Below Poverty Level	2010-2014 ACS Estimate Below Poverty Level
Under 18 years	752	1,244
18 to 64 years	2,026	2,344
65 years and over	684	875
Total	3,462	4,463

Source: American Census Survey, 5-Year Estimate

Household Size	Poverty Guideline (for 48 Continuous States and the District of Columbia)	
	2018	2019
1	\$12,140	\$12,490
2	\$16,460	\$16,910
3	\$20,780	\$21,330
4	\$25,100	\$25,750
5	\$29,420	\$30,170
6	\$33,740	\$34,590
7	\$38,060	\$39,010
8	\$42,380	\$43,430
For each additional person, add	\$4,320	\$4,420

*Source: Office of the Assistant Secretary for Planning and Evaluation, U.S.
Department of Health and Human Services*

Through the Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG), the City of Newton targets its federal funds to support programs that, to the maximum extent possible, service extremely low- and moderate-income persons.

The City of Newton’s CDBG Public Services and ESG program provide grants to support a number of a programs that are intended to serve poverty-level and low-income households in Newton and surrounding communities, including Brookline, Waltham, and Watertown.

Across the Consortium, there are an estimated 33,413 individuals living below the poverty level (2017 five-year American Community Survey). HOME-funded Tenant Based Rental Assistance and HOME-assisted units hold the potential to transition these individuals out of poverty and prevent other households from slipping below the poverty level. The highest poverty rates in the Consortium are found in Brookline, Framingham, and Waltham. These entitlement communities also provide the maximum allowable CDBG funding for public service activities,

which primarily serve low to moderate income persons and households. In many of the smaller Consortium communities, such as Bedford, Concord, Lexington, Sudbury and Wayland, the housing authorities are the primary resource for assisting poverty-level households.

5. Actions planned to develop institutional structure

The Housing and Community Development Division will continue to enhance program coordination functions through improved inter-departmental communication, earlier identification and scoping of projects and priorities, continued engagement of local, private, nonprofit, state and federal partners and a greater focus on outcome measures.

For many of the Consortium communities, the biggest gap in institutional structure results from limited departmental capacity due to larger workloads, staff turnover, and small numbers of staff.

The Towns of Bedford, Concord, Lexington, Sudbury and Wayland are members of the RHSO, a municipal regional collaborative providing technical assistance to the municipal boards, committees and staff. This has served to increase municipal capacity for affordable housing.

The 2018 Belmont Town Meeting approved a \$250,000 affordable housing fund to enable the Housing Trust to respond quickly to housing opportunities that arise from time to time. This fund allows the Housing Trust to conduct various pre-development activities without going through the municipal funding process. The Housing Trust will continue to seek CPA funding to enable the Trust to respond quickly to housing opportunities that arise from time to time.

Framingham's Community Development Department credits its success to cooperative participation of governmental agencies, nonprofit organizations, private enterprises and individuals in its service delivery. The Department's approach is to build new relationships that benefit clients and the community in the form of referrals to the tenant based rental assistance program, housing rehabilitation program, and responses to an RFP for new services by local agencies. This approach also contributes to the creation of a strong-civic infrastructure comprising of the public, private, and non-profit sectors. It generates networks, coalitions, and partnerships that serve as platforms for continued dialogue on community improvements.

Waltham Housing Division has increased staff in 2020 and has hired a principal office assistant that is fluent in Spanish. This position enables the city to assist applicants with all applicant intakes for the city's Tenant Based Rental Assistance and emergency assistance programs that have a language barrier.

6. Actions planned to enhance coordination between public and private housing and social service agencies

Please refer to section AP-10: Consultation at the beginning of this plan.

Program Specific Requirements

AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

1. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

For those communities that have utilized HOME funds for homebuyer and homeownership activities, program participants are required to occupy the property acquired with assistance through the program as their principal residence for the duration of the Affordability Period, in accordance with **24 CFR 92.254(a)(4)**. The Affordability Period is determined by the amount of HOME financial assistance provided to the program participant, as detailed in the table below.

Downpayment/Homebuyer	Affordability Period
Less than \$15,000	Five (5) Years
\$15,000 - \$40,000	Ten (10) Years
Over \$40,000	Fifteen (15) Years

Period of Affordability Chart

Bedford, Belmont, Concord, Lexington, Needham, Sudbury and Wayland

These communities are unable to utilize HOME funds for ownership units of new construction due to the conflicts between the State's affordable housing deed riders and the HOME Program rule, with respect to the resale and recapture provisions. These communities understand that if a HOME-assisted homeownership project or program is put forward, the recapture/resale provision will have to be submitted to HUD (through the Consortium Administrator) for approval prior to HOME funds being used for such assistance. This guideline has not changed since the submission of the FY16-20 Consolidated Plan.

Brookline

When providing homebuyer assistance, that is, funding directly to a homebuyer to purchase an existing unit at a market price, the town will continue to pursue two different strategies.

- (1) If the unit is located in a property with fewer than six units, at the time of resale, the seller will repay to the town the down payment assistance provided plus that portion of the net appreciation, if any (current market price minus original sales price, appraisal fee, if any, brokerage fee up to five percent of resale price, and the depreciated cost of approved capital improvements) which reflects the proportion

of public subsidy to total equity invested. Total equity consists of town homebuyer assistance, owner down payment, owner pay-down of principal and, for consistency with HUD requirements, the cost of capital improvements referenced earlier. In no case will the owner be required to repay the town more than the net proceeds for the sale, that is, the sales price minus non-HOME loan repayment and sale-related and closing costs.

- (2) If the unit is in a property with six or more units, the town will have a right of first refusal at a price which represents the original purchase price, minus the subsidy, adjusted by changes in AMI or 80 percent of median income, whichever is lower, plus compensation for the depreciated cost of approved capital improvements, plus the amount in the condominium association's segregated capital replacement account attributable to the unit. In the event that the town cannot exercise its rights, the seller will be free to sell on the market and repay the loan with shared appreciation in accordance with (1), above.

It should be noted that the town has not operated this type of Housing Assistance Program for a number of years due to the high price of market-rate units. For example, median condo prices in Brookline for 2019 are over \$900,000 and single families are even more expensive. Even with generous subsidies, most market-rate units are unaffordable to households earning less than 80% of AMI. At this time, the town prefers to use all locally-controlled resources to support affordable housing projects that can leverage state, federal, and private funding resources.

The town will continue to use the Commonwealth of Massachusetts' Affordable Housing Deed Rider as a resale restriction for units which are offered – through inclusionary zoning, the State Chapter 40B program and/or various non-HOME subsidies. According to this deed rider, resale price is based upon increases over time in Area Median Income, adjusted by the commercially reasonable cost of approved capital improvements, depreciated over the remaining years of the owner's occupancy, as long as the price at resale is neither more than what a range of income-eligible buyers can afford nor less than the owner's initial purchase price.

However, where HOME funds are provided to a developer in order to acquire and rehab or build new units for sale at affordable prices, the town will use a resale agreement running with the land that will provide the owner with a fair return on investment, while assuring that the unit will be affordable to a range of income-eligible buyers at least through the HOME period of affordability. Resale price will be the initial sales price plus the commercially reasonable cost of approved capital improvements depreciated over the remaining years of the owner's occupancy, plus return on investment. Investment will be defined as the original downpayment, annual contributions to principal, and commercially reasonable cost of approved capital improvements. Return on investment will be calculated as the sum of the annual interest on the owner's cumulative investment (without compounding), based on the interest rate of ten-year bond obligations of the United States Treasury.

With regard to repayment for capital improvements, capital improvements must be approved beforehand, and be of function and quality (or be so valued) consistent with the use of the housing as affordable housing. The capital improvements are those owned by the condominium owner (and not part of common space) and might include, for example, the replacement, due to damage or long term wear and tear, of windows, heating or hot water systems, and stove, refrigerator or dishwasher.

The Town understands that, to the extent that resale price for a HOME-subsidized unit during the HUD period of affordability exceeds what a range of income-eligible buyers can afford, it may be obligated to fund the difference. A resale price is within the range of income-eligible buyers if it is based upon what a household with a size which equals the number of bedrooms plus one and an income 10 percent below the relevant income limit can afford when spending no more than 30 percent of gross income on housing costs (mortgage, real estate taxes, home and private mortgage insurance, and condo fees), assuming current interest rates offered plus one quarter percent for a 30 year, no point fixed-rate loan with a down payment of five percent of total costs. Units that come up for resale will be targeted to low-income first-time homebuyers earning up to 80 percent of the Boston-Cambridge-Quincy MA-NH Area Median Income (AMI), as published by the U.S. Department of Housing and Urban Development, for the duration of the HOME Period of Affordability (*see affordability period chart at the beginning of Section 1*) and as consistent with the number of bedrooms in the unit.

With regard to the preservation of affordable rental housing, when providing funding to developers/owners of rental properties, the town will continue to structure the subsidy as a long-term deferred interest loan, which may be extended if required for continued affordability, and to reserve for the town a right of first refusal to purchase the property should the owner seek to sell.

Framingham

The City of Framingham employs a deed restriction to serve as a recapture mechanism for its HOME-funded downpayment assistance and housing rehabilitation programs. The Period of Affordability Chart identified in the beginning of Section 1 will apply. For both types of assistance, if the premises are sold, cease to be the mortgagor's primary residence or there is any change in the title during the term of the promissory note, which commences upon the completion date, or the mortgagor is not in substantial compliance with the promissory note and mortgage, the town will recapture the full HOME loan or the net proceeds, if the net proceeds are less than the full amount of the HOME loan and the Mortgagor's investment.

Natick

The Town of Natick will use the recapture provisions for those housing units that are not intended to be listed on the DHCD Subsidized Housing Inventory (SHI), or do not qualify for the DHCD Local Initiative Program and/or Local Action Units. In these cases, the amount subject to recapture is the amount of the direct subsidy provided to the homeowner, and/or the

difference between the fair market value of the property and a reduced sales price attributable to HOME development assistance. The HOME assistance will be recaptured in the full amount of the direct subsidy based on the availability of net proceeds which is defined as the sales price minus superior loan repayment (other than HOME funds) and any closing costs.

For those housing units that are intended to be listed on the DHCD SHI and/or qualify for the DHCD Local Initiative Program or Local Action Unit, the Town of Natick will use the resale provisions to ensure long term affordability. The Period of Affordability outlined at the beginning of Section 1 will apply. In these cases during the HOME period of affordability, the property must remain affordable to low income homebuyers spending no more than 30 percent of gross income on mortgage payments (PITI) and condo fees; and be sold at a price that provides the owner a fair return on investment. The sale of the property is limited to a credit-worthy eligible purchaser earning between seventy and eighty percent (70-80%) of the Area Median Income for an appropriate size household. During the initial 90 days of marketing, the town will have a Right of First Refusal to purchase the property.

The basis for a fair return on investment includes the homebuyer's original investment and capital improvements and is dependent on a maximum sales price based on the change in Area Median Income (AMI) over the period of ownership. The maximum sales price is determined by taking the ratio of the original HOME assisted unit sales price over the purchase year AMI, and multiplying this number by the current AMI to get the current base sales price, to which is added closing costs and capital improvements. Capital improvements must be approved by the town to be considered and are defined as a necessary improvement, not covered by a condo or homeowner fee, that if not done would compromise the structural or functional integrity of the original property. The value of capital improvements at the time of resale will be based on a depreciation schedule. The town understands that, to the extent that resale price for a HOME-subsidized unit during the HUD period of affordability exceeds what a range of income-eligible buyers can afford, it may be obligated to fund the difference.

The City of Waltham enforces a recapture provision on all Down Payment assistance loans that it has provided through the WestMetro HOME Consortium. If the premises are sold, cease to be the Mortgagor's primary residence or there is any change in the title during the term of the Promissory Note, which commences upon the Completion Date, or the Mortgagor is not in substantial compliance with the Promissory Note and Mortgage, the city will recapture the full HOME loan or the net proceeds, if the net proceeds are less than the full amount of the HOME loan and the Mortgagor's investment. The city specifically reserves the right to require full repayment, notwithstanding any deficiency in the amount of the net proceeds, in the event that repayment is triggered by a willful violation by the Borrower of the terms of the Note, or the Mortgage or any applicable HOME regulations. This recapture provision conforms to HUD HOME regulation 24 CFR 92.254 (a)(5)(ii). HUD defines the net proceeds as the sales price minus non-HOME loan repayments and closing costs. If the net proceeds are sufficient to repay both the HOME loan and the Borrower's investment (HUD defines Borrower's investment as the Borrower's down payment and any capital improvement investment), the city must recapture

the full HOME loan. Please note, however, that when the net proceeds are insufficient to repay the full HOME assistance, the city will not permit the Borrower to recover more than his/her investment.

The Principal sum may be deferred annually by the city based upon annual review by the Lender of the Borrower's compliance with the terms of this Mortgage, the HOME Program and HOME Project funding agreement and the Promissory Note. The City of Waltham defines capital improvements as a necessary maintenance improvement, not covered by a condominium or homeowners association fee, that if not done would compromise the structural integrity of the property. To be considered a capital improvement, work should meet the following criteria:

- It is not a repair to keep your home in good operating condition.
- It is a new element or replacement of a permanent component of the home, which has reached the end of its useful life.
- It is not part of a common area nor covered by the condominium association fee. This applies to all condo-developed property. (If the condominium or homeowner's association has a special assessment, the city will take into consideration the cost to the homeowner on a case-by-case basis. Additional documentation will be necessary to provide proof of the special assessment.)

Repairs funded by any federal or state or local Grant Programs are not counted or approved. Improvements such as installation of outdoor decks, additions, garages, and landscaping are luxury improvements and will not be considered as capital improvements.

Newton

The City of Newton utilizes HOME Program funds for new construction and rehabilitation of affordable rental housing, as projects arise. Direct downpayment assistance is provided through CDBG funds. In the past, when HOME funds were used to support affordable homeownership, Newton used a resale provision incorporated into an affordable housing covenants running with the land. The terms of the resale provision, which apply during the HOME Period of Affordability, are as follows:

Long-Term Affordability. All HOME-assisted units must be sold only to a buyer whose family qualifies as a low-income family earning up to 80 percent of the Boston-Cambridge-Quincy MA-NH Area Median Income (AMI), as published by the U.S. Department of Housing and Urban Development, for the duration of the HOME Period of Affordability. If an eligible buyer is not identified within the allotted resale timeframe, the city may exercise a purchase option to ensure that the HOME-assisted unit is resold to a low-income family.

Principal Residence Requirement. The initial purchaser, and all subsequent buyers of a HOME-assisted unit, must use the property as his/her/their principal residence. Newton conducts annual monitoring to ensure this requirement is met.

Resale Price & Fair Return on Investment. If the HOME-assisted unit is sold by the owner during the HOME Period of Affordability, the resale price is calculated as the percentage change of 80 percent of the AMI, as published by HUD, during the term of ownership by the homeowner, plus approved Capital Improvements depreciated over the course of their usual life.

Calculating Fair Return on Investment. Fair Return on Investment is calculated by multiplying the initial purchase price of the HOME-assisted unit by a fraction, the numerator of which is 80 percent of the AMI as published by HUD as of the date of receipt of the owner's notice to sell the affordable unit (Conveyance Notice) and the denominator of which is 80 percent of the AMI as published by HUD as of the date of the initial closing, plus approved Capital Improvements, depreciated over the course of their useful life. The original homeowner's investment (e.g. any downpayment) is included as part of the initial purchase price.

Capital Improvements. Capital Improvements are elements which may add to the value of the unit or prolong its useful life, are of function and quality consistent with comparable affordable housing units, and are owned solely by the owner (not part of any common areas). Maintenance is not considered a capital improvement. The city must approve all capital improvements prior to costs being incurred. These approved capital improvements are subject to depreciation based on the remaining useful life of the element at time of resale. Improvements that are funded by federal, state or local grant programs are not eligible. Some examples of capital improvements include the replacement of non-operational heating or hot water systems, built-in appliances, installation of energy-efficient windows, and insulation.

Continued Affordability to Homebuyers. In accordance with the HOME regulations, Newton is obligated to ensure that the owner of a HOME-assisted unit receives a Fair Return on Investment and that the unit remains affordable to a range of income eligible households upon resale. To maintain continued affordability, the city will target subsequent purchase to appropriately-sized households earning between 70 and 80 percent of the AMI spending no more than 35 percent of gross household income on fixed housing costs (principal, interest, property taxes, condominium fees, if applicable, and insurance), assuming current interest rates offered plus one quarter percent for a 30-year, fixed rate loan and a downpayment of 5 percent. If the resale price exceeds what an eligible household can afford, the city may choose to subsidize the difference with downpayment assistance, mortgage buydown, or other subsidy, as appropriate. To be considered eligible, homebuyers will also be subject to an asset limit of \$75,000. However, any assets up to \$200,000 from the sale of a Newton residence shall be excluded from that determination (but still considered in determination of income eligibility) provided that:

- (a) the sellers must have been no less than 62 years old at the time of that sale; and
- (b) the sale of the residence must be an arms-length transaction.

Waltham

The City of Waltham enforces a recapture provision on all Down Payment assistance loans that it has provided through the WestMetro HOME Consortium. If the premises are sold, cease to be

the Mortgagor's primary residence or there is any change in the title during the term of the Promissory Note, which commences upon the Completion Date, or the Mortgagor is not in substantial compliance with the Promissory Note and Mortgage, the city will recapture the full HOME loan or the net proceeds, if the net proceeds are less than the full amount of the HOME loan and the Mortgagor's investment. The city specifically reserves the right to require full repayment, notwithstanding any deficiency in the amount of the net proceeds, in the event that repayment is triggered by a willful violation by the Borrower of the terms of the Note, or the Mortgage or any applicable HOME regulations. This recapture provision conforms to HUD HOME regulation 24 CFR 92.254 (a)(5)(ii). HUD defines the net proceeds as the sales price minus non-HOME loan repayments and closing costs. If the net proceeds are sufficient to repay both the HOME loan and the Borrower's investment (HUD defines Borrower's investment as the Borrower's down payment and any capital improvement investment), the city must recapture the full HOME loan. Please note, however, that when the net proceeds are insufficient to repay the full HOME assistance, the city will not permit the Borrower to recover more than his/her investment.

The Principal sum may be deferred annually by the city based upon annual review by the Lender of the Borrower's compliance with the terms of this Mortgage, the HOME Program and HOME Project funding agreement and the Promissory Note. The City of Waltham defines capital improvements as a necessary maintenance improvement, not covered by a condominium or homeowners association fee, that if not done would compromise the structural integrity of the property. To be considered a capital improvement, work should meet the following criteria:

- It is not a repair to keep your home in good operating condition.
- It is a new element or replacement of a permanent component of the home, which has reached the end of its useful life.
- It is not part of a common area nor covered by the condominium association fee. This applies to all condo-developed property. (If the condominium or homeowner's association has a special assessment, the city will take into consideration the cost to the homeowner on a case-by-case basis. Additional documentation will be necessary to provide proof of the special assessment.)

Repairs funded by any federal or state or local Grant Programs are not counted or approved. Improvements such as installation of outdoor decks, additions, garages, and landscaping are luxury improvements and will not be considered as capital improvements.

Watertown

Watertown, on any new projects using HOME funds, through the Watertown Housing Partnership, uses the Massachusetts Department of Community Development and Housing's Capital Improvements Policy and Procedures. Watertown uses a recapture provision which requires the HOME loan recipient to repay the loan, and, in some cases, a pre-payment penalty and a share in the appreciation in the project from the proceeds of the sale. The Period of Affordability Chart identified in the beginning of Section 1 will apply.

2. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

For those communities that have utilized HOME funds for homebuyer and homeownership activities, program participants are required to occupy the property acquired with assistance through the program as their principal residence for the duration of the Affordability Period, in accordance with **24 CFR 92.254(a)(4)**. The Affordability Period is determined by the amount of HOME financial assistance provided to the program participant, as detailed in the table below.

Downpayment/Homebuyer	Affordability Period
Less than \$15,000	Five (5) Years
\$15,000 - \$40,000	Ten (10) Years
Over \$40,000	Fifteen (15) Years

Period of Affordability Chart

Bedford, Concord, Lexington, Needham, Sudbury, and Wayland

These communities choose not to utilize HOME funds for newly constructed ownership units due to the conflicts between the State’s affordable housing deed riders and the HOME Program rule, with respect to the resale and recapture provisions. This guideline has not changed since the submission of the FY16-20 Consolidated Plan.

Brookline

When providing homebuyer assistance, that is, funding directly to a homebuyer to purchase an existing unit at a market price, the town will continue to pursue two different strategies.

- (1) If the unit is located in a property with fewer than six units, at the time of resale, the seller will repay to the town the down payment assistance provided plus that portion of the net appreciation, if any (current market price minus original sales price, appraisal fee, if any, brokerage fee up to five percent of resale price, and the depreciated cost of approved capital improvements) which reflects the proportion of public subsidy to total equity invested. Total equity consists of town homebuyer assistance, owner down payment, owner pay-down of principal and, for consistency with HUD requirements, the cost of capital improvements referenced earlier. In no case will the owner be required to repay the town more than the net proceeds for the sale, that is, the sales price minus non-HOME loan repayment and sale-related and closing costs.

- (2) If the unit is in a property with six or more units, the town will have a right of first refusal at a price which represents the original purchase price, minus the subsidy, adjusted by changes in AMI or 80 percent of median income, whichever is lower, plus compensation for the depreciated cost of approved capital improvements, plus the amount in the condominium association's segregated capital replacement account attributable to the unit. In the event that the town cannot exercise its rights, the seller will be free to sell on the market and repay the loan with shared appreciation in accordance with (1), above.

The town will continue to use the Commonwealth of Massachusetts' Affordable Housing Deed Rider as a resale restriction for units which are offered – through inclusionary zoning, the State Chapter 40B program and/or various non-HOME subsidies. According to this deed rider, resale price is based upon increases over time in Area Median Income, adjusted by the commercially reasonable cost of approved capital improvements, depreciated over the remaining years of the owner's occupancy, as long as the price at resale is neither more than what a range of income-eligible buyers can afford nor less than the owner's initial purchase price.

However, where HOME funds are provided to a developer in order to acquire and rehabilitate or build new units for sale at affordable prices, the town will use a resale agreement running with the land that will provide the owner with a fair return on investment, while assuring that the unit will be affordable to a range of income-eligible buyers at least through the HOME period of affordability. Resale price will be the initial sales price plus the commercially reasonable cost of approved capital improvements depreciated over the remaining years of the owner's occupancy, plus return on investment. Investment will be defined as the original downpayment, annual contributions to principal, and commercially reasonable cost of approved capital improvements. Return on investment will be calculated as the sum of the annual interest on the owner's cumulative investment (without compounding), based on the interest rate of ten-year bond obligations of the United States Treasury.

With regard to repayment for capital improvements, capital improvements must be approved beforehand, and be of function and quality (or be so valued) consistent with the use of the housing as affordable housing. The capital improvements are those owned by the condominium owner (and not part of common space) and might include, for example, the replacement, due to damage or long term wear and tear, of windows, heating or hot water systems, and stove, refrigerator or dishwasher.

The town understands that, to the extent that resale price for a HOME-subsidized unit during the HUD period of affordability exceeds what a range of income-eligible buyers can afford, it may be obligated to fund the difference. A resale price is within the range of income-eligible buyers if it is based upon what a household with a size which equals the number of bedrooms plus one and an income 10 percent below the relevant income limit can afford when spending no more than 30 percent of gross income on housing costs (mortgage, real estate taxes, home and private mortgage insurance, and condo fees), assuming current interest rates offered plus one quarter percent for a 30 year, no point fixed-rate loan with a down payment of five percent

of total costs. Units that come up for resale will be targeted to low-income first-time homebuyers earning up to 80 percent of the Boston-Cambridge-Quincy MA-NH Area Median Income (AMI), as published by the U.S. Department of Housing and Urban Development, for the duration of the HOME Period of Affordability (*see affordability period chart outlined above*) and as consistent with the number of bedrooms in the unit.

With regard to the preservation of affordable rental housing, when providing funding to developers/owners of rental properties, the town will continue to structure the subsidy as a long-term deferred interest loan, which may be extended if required for continued affordability, and to reserve for the town a right of first refusal to purchase the property should the owner seek to sell.

Framingham

In Framingham, HOME-assisted units must meet the affordability requirements of five to 20 years beginning after project completion (*Please see affordability period chart outlined above*). The affordability requirements apply without regard to the term of any loan or mortgage or the transfer of ownership. They are imposed by deed restrictions approved by HUD. The deeds are structured to recapture funds when the following circumstances occur:

- If the premises are sold
- Cease to be the client's primary residence
- Any change in the title during the term of the promissory note, which commences upon the completion date
- Substantial non-compliance with the promissory note and mortgage by the client

When triggered, recaptures take back the full HOME loan or the net proceeds, if the net proceeds are less than the full amount of the HOME loan and the client's investment.

Natick

The Town of Natick will use the recapture provisions for those housing units that are not intended to be listed on the DHCD Subsidized Housing Inventory (SHI), or do not qualify for the DHCD Local Initiative Program and/or Local Action Units. In these cases, the amount subject to recapture is the amount of the direct subsidy provided to the homeowner, and/or the difference between the fair market value of the property and a reduced sales price attributable to HOME development assistance. The HOME assistance will be recaptured in the full amount of the direct subsidy based on the availability of net proceeds which is defined as the sales price minus superior loan repayment (other than HOME funds) and any closing costs.

For those housing units that are intended to be listed on the DHCD SHI and/or qualify for the DHCD Local Initiative Program or Local Action Unit, the Town of Natick will use the resale provisions to ensure long term affordability. The Period of Affordability outlined at the beginning of Section 1 will apply. In these cases during the HOME period of affordability, the property must remain affordable to low income homebuyers spending no more than 30 percent of gross income on mortgage payments (PITI) and condo fees; and be sold at a price that provides the owner a fair return on investment. The sale of the property is limited to a

credit-worthy eligible purchaser earning between seventy and eighty percent (70-80%) of the Area Median Income for an appropriate size household. During the initial 90 days of marketing, the town will have a Right of First Refusal to purchase the property.

The basis for a fair return on investment includes the homebuyer's original investment and capital improvements and is dependent on a maximum sales price based on the change in Area Median Income (AMI) over the period of ownership. The maximum sales price is determined by taking the ratio of the original HOME assisted unit sales price over the purchase year AMI, and multiplying this number by the current AMI to get the current base sales price, to which is added closing costs and capital improvements. Capital improvements must be approved by the town to be considered and are defined as a necessary improvement, not covered by a condo or homeowner fee, that if not done would compromise the structural or functional integrity of the original property. The value of capital improvements at the time of resale will be based on a depreciation schedule. The town understands that, to the extent that resale price for a HOME-subsidized unit during the HUD period of affordability exceeds what a range of income-eligible buyers can afford, it may be obligated to fund the difference.

Newton

Under resale provisions, all properties acquired through a development subsidy or receiving direct homebuyer assistance with HOME funds will have a recorded deed restriction stating the affordability period and the process for calculating the resale amount to ensure long term affordability to an income-eligible household during the affordability period. Additionally, any loan issued by the city is secured by a mortgage and promissory note.

Waltham

Under recapture provisions, all properties receiving direct homebuyer assistance and/or rehabilitated with HOME funds will have a recorded mortgage stating the affordability period (*outlined above*) and the process for calculating the recapture amounts.

Watertown

Under recapture provisions, all properties receiving direct homebuyer assistance with HOME funds will have a recorded mortgage stating the affordability period (*outlined above*) and the process for calculating the recapture amounts.

3. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

No communities have plans to refinance existing debt secured by properties that have HOME funds in FY21 (FFY20)

**Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)**

- 1. Include written standards for providing ESG assistance (may include as attachment) In accordance with federal regulations set forth in 24 CFR Part 567, the City of Newton's Department of Planning and Development has developed written standards guiding the provision and prioritization of Emergency Solutions Grant (ESG) funding.**

Service providers contracted with the City of Newton to provide services in conjunction with the Emergency Solutions Grant must become thoroughly familiar with all regulations promulgated by the United States Department of Housing and Urban Development (HUD) governing the Emergency Solutions Grant Program and the City of Newton's written standards. All sub-grantees are responsible for implementing the service in accordance with these regulations.

(Please also see Written Standards for the Provision of ESG Assistance in the appendix)

- 2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.**

Coordinated Entry refers to the process used to assess and assist in meeting the housing needs of people experiencing homelessness. This process is intended to serve people experiencing homelessness with ties to the communities of the Balance of State (BoS) Continuum of Care (CoC). BoS Coordinated Entry aims to allocate assistance as effectively as possible in order to meet consumer housing needs including, fostering increased collaboration between service providers, avoiding duplication of services, assessing and prioritizing based on vulnerability, and reducing the amount of time individuals experiencing homelessness must wait before accessing assistance. All individuals identifying as homeless are evaluated, regardless of initial residency, by outreach workers and service providers through centralized intake. CE staff then work to connect individual(s) to appropriate services and programming.

In January 2020, the BoS CoC updated its Coordinated Entry scoring process to place a priority and emphasis on homeless youth. Updated materials have been included in the City's written standards.

- 3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based**

organizations).

The distribution of Emergency Solutions Grant funding to sub-recipients is determined through a competitive, annual RFP process. Division staff also consults with sub-recipients as to their programs and funding needs. The RFP requires the respondents to indicate how their programs will assist homeless individuals and families or those at risk of homelessness in each of these areas, as well as how the programs will help clients achieve housing stability.

In advance of the distribution of the initial FY21 (FFY20) RFP, the Brookline-Newton-Waltham-Watertown local providers and BoS CoC representation met to deliberate and approve allocation percentages across eligible program components helping homeless individuals and families and those at-risk of becoming homeless. These components include Street Outreach, Shelter Operations/Services, Homelessness Prevention, Rapid Re-housing, and HMIS. After discussion and deliberation, the cohort recommended to not allocate ESG funding for street outreach as providers identified unsheltered homeless individuals and families to be serviced by existing resources. As a result, the cohort recommended striking a balance between funding existing shelter services activities and focusing resources on HUD's long-term priorities of homelessness prevention and rapid re-housing. These principles align with the BoS' and United States Interagency Council on Homelessness' Strategic Plans to End Homelessness. Finally, a small percent of ESG funds are allocated to support agencies with HMIS or the installation of a comparable database to ensure compliance with HUD's reporting requirements.

- 4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.**

To the extent possible, outreach is made to residents who have experienced homelessness. The Point-In-Time Count (sheltered and unsheltered) and the Housing Inventory Count are now managed by the BoS CoC. The BoS CoC develops a survey to determine demographic information about this vulnerable population, as well as specific reasons for why someone is homeless and/or, whenever possible, what services may be needed to improve his/her situation in the future.

In addition, the representatives of the four municipalities and local homelessness providers meet annually to determine the percentage allocation for each category of eligible services: Street Outreach, Shelter Operations/Services, Rapid Re-housing, Homelessness Prevention, and HMIS. Agency staff have direct contact with potential beneficiaries, as well as long track records of providing services directly to the homeless and at-risk homelessness populations,

and their work specifically informs this allocation.

5. Describe performance standards for evaluating ESG.

As part of the FY21 RFP review process, the review committee members, consisting of representatives from the City of Waltham, City of Newton Planning and Development Department and Newton Health and Human Service Department, BoS CoC, and Pine Street Inn, a local provider, evaluate the uses and outcomes of existing ESG-funded projects from FY19 and FY20 should the providers choose to re-apply for funds for the upcoming fiscal year. This is accomplished through the analysis of reports of monitored programs, as well as a review of quarterly performance reports that are submitted during the grant year. The RFP is also evaluated with the assistance of a quantitative scoring sheet.

As allocations are becoming increasingly more data driven, ESG and CoC service providers must navigate the Efforts to Outcomes (ETO) HMIS system, or the DV equivalents, to input client intake/exit information and ensure accurate data compilation and reporting. Beginning in October 2017, ESG recipients were required to submit this accomplishment data into the Sage HMIS Reporting Repository. The ESG-CAPER Annual Reporting Tool (eCart), used the past two program years, will no longer be used for this process. In addition, BoS CoC continues to offer on-going trainings for providers to enhance their knowledge and understanding of the HMIS system. Most recently, ESG sub-recipients attended a HMIS training in June 2019, offered by the BoS CoC.

APPENDIX

APPENDIX: CITIZEN PARTICIPATION PLANS

CITIZEN PARTICIPATION PLAN
CITY OF NEWTON HOUSING AND COMMUNITY DEVELOPMENT PROGRAM
REVISED MARCH 2019. Approved at Annual Action Plan Public Hearing.

The City of Newton annually receives Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME) and Emergency Solutions Grant (ESG) funds from the U.S. Department of Housing and Community Development (HUD), which it administers through the Housing and Community Development Division of the Planning and Development Department. The primary purpose of these formula grant programs is to develop viable communities through the provision of decent housing, a suitable living environment and expanding economic opportunities for low- and moderate-income persons. As a recipient of these entitlement program funds, the City is required to produce the following documents:

- **Consolidated Plan** – a five-year plan that documents Newton’s housing and community development needs, outlines strategies to address those needs, and identifies proposed program accomplishments
- **Annual Action Plan** – an annual plan that describes specific CDBG-, HOME- and ESG-funded projects that will be undertaken over the course of the upcoming fiscal year
- **Consolidated Annual Performance and Evaluation Report (CAPER)** – an annual report that evaluates the use of CDBG, HOME and ESG funds following the close of the fiscal year
- **Analysis of Impediments to Fair Housing Choice** – a five-year plan that analyzes disparities in access to housing opportunities in the City and identifies priorities and goals to address these issues.

This Citizen Participation Plan has been developed to provide citizens and other interested parties with opportunities to participate in an advisory role in the planning, implementation and evaluation of the CDBG, HOME and ESG programs which primarily benefit Newton’s low- and moderate-income residents, and to review and comment on each of the documents listed above.

Citizen participation in CDBG, HOME and ESG program activities ranges from conducting needs assessments and strategic planning to providing input on project selection, development, implementation and evaluation. The Citizen Participation Plan outlines the City’s responsibility to solicit active citizen participation. The goals of the Citizen Participation Plan are to:

- Encourage citizen participation by all Newton residents, emphasizing the involvement of low- and moderate-income residents, persons with disabilities, minorities, non-English speaking persons and residents of assisted housing;
- Inform citizens of the Newton Consolidated Plan, CAPER, the Analysis of Impediments to Fair Housing Choice and the Annual Action Plan, including funds available from CDBG, HOME, ESG and other Continuum of Care Homeless Programs and eligible activities under these programs;
- Give all citizens an opportunity to identify and respond to priority needs;
- Give all citizens an opportunity to identify and respond to proposed projects, actions, policies and the use of funds; and
- Give all citizens an opportunity to review and comment on program performance.

1. Process for Citizen Participation

Opportunities for citizen participation in the planning and development of the Newton Consolidated Plan, Analysis of Impediments to Fair Housing Choice, the Annual Action Plan, and the CAPER will be provided through several levels of community involvement and outreach, including:

Individual Citizens

The participation of individual citizens is critical to the City of Newton's Housing and Community Development Program. Reasonable efforts will be employed to make all citizens aware of the Program-related meetings and events in their neighborhoods, as well as public hearings and citywide events that are related to the development of the Consolidated Plan, the Analysis of Impediments to Fair Housing Choice, the Annual Action Plan and the CAPER. It is the goal of the Program to create opportunities for participation for all interested citizens, including, but not limited to, low- and moderate-income residents, persons with disabilities, minorities, non-English speaking persons and residents of assisted housing.

Newton Housing Partnership

While the Newton Housing Partnership plays a critical role in the review and evaluation of CDBG- and HOME-funded projects, it is also instrumental in shaping housing policy for the city as a whole. The Partnership's mission is to foster, support and initiate land use, planning and fiscal policies and actions that ensure the development and preservation of housing to serve a socially and economically diverse community. In order to fulfill its mission, the Partnership acts in an advisory capacity to the Mayor, the City Council and its committees, the Planning and Development Board, the Zoning Board of Appeals, the Community Preservation Committee and city staff. Consisting of up to 9 members, the Newton Housing Partnership represents Newton residents, organizations, businesses and institutions which are based in Newton or which serve the housing needs of Newton residents.

Fair Housing Committee

The Fair Housing Committee works with the Mayor and City staff to promote, support and affirmatively further Newton's efforts to be a diverse and welcoming community with housing choices and opportunities free from housing discrimination. Acting in an advisory capacity to the Mayor, the City Council, and all applicable City departments, boards, and committees, this Committee aims to assure that policies and practices relating to fair housing are incorporated into City operations and community activities, as well as facilitate public education and outreach. The committee collaborates with City staff to spearhead the community participation process for the Analysis of Impediments to Fair Housing Choice, which will be completed once every five years. The Committee's bylaws allow the Mayor to appoint up to 11 members and residents, who represent Newton-based institutions, organizations, and businesses that serve the housing needs of Newton residents. The membership shall reflect the diversity of persons who are protected by civil rights laws, and shall include one or more persons with expertise in fair housing and civil rights laws.

Commission on Disability

The mission of the Commission on Disability (COD) is to foster equal access to community life and activities for people with disabilities. Through education and advocacy, the Commission works with the Mayor and City staff to raise awareness about the needs of people with disabilities and the importance of increased accessibility to programs, housing and facilities in municipal and commercial

buildings, and other public entities. The COD informs project priorities and provides recommendations for use of Community Development Block Grant (CDBG) funds in projects that remove architectural barriers and increase accessibility throughout the City of Newton. Commission members are a diverse representation of Newton's disability population and include residents, representatives of organizations, as well as businesses and institutions, which are based in Newton and serve the needs of Newton residents. The COD consists of not less than 5 but no more than 9 members appointed by the Mayor.

Organizations, Agencies and the Newton Housing Authority

In developing a plan for the best use of CDBG, HOME and ESG funds, the Newton Housing and Community Development Program relies heavily on the input of other agencies involved in the development and implementation of projects to assist low- and moderate-income citizens, including the Newton Housing Authority, the Balance of State (BoS) Continuum of Care (CoC), many area nonprofit organizations and state housing and community development agencies. These agencies and organizations are encouraged to participate in the development of the Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan, and CAPER and are asked to review and comment on the proposed documents.

Planning and Development Board

The Planning and Development Board, acting as the Community Development Board, is the governing citizen body that considers the recommendations made by Division staff and City departments, other Newton agencies and organizations and citizens related to the CDBG, HOME and ESG Programs. Following a public hearing to allow for open discussion, the Planning and Development Board forwards their recommendations to the Mayor for final review and approval. When funding requests are made to the Planning and Development Board (while acting as the Community Development Board), representatives of the party requesting project funding and/or Division staff will present the proposal to the Board. The Public Hearing is held open during the 15- or 30-day comment period to ensure that public comments made during that timeframe are adequately considered by the Board before a final funding decision is made by the Mayor.

Public hearings on the proposed Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan and CAPER are conducted by the Board, as well as public hearings for proposed substantial amendments to the Consolidated Plan and/or Annual Action Plan. The Board is composed of residents of the City of Newton and is comprised of six full members (one of which is appointed by the state Secretary of Housing and Community Development), the Planning and Development Department Director (*ex officio*), and up to five alternate members. Unless their schedule is disrupted by a holiday or inclement weather, the Planning and Development Board meets on the first Monday of every month at Newton City Hall.

City Council

The City Council is the final citizen policy body that reviews and takes action on the Consolidated Plan and the Annual Action Plan. After receiving the plan from the Mayor, the City Council considers and then votes on approval of the submission of the proposed Plan and on acceptance of the CDBG, HOME and ESG grants from HUD. After the City Council votes, the Plan can be formally submitted to HUD.

2. Public Meetings and Public Hearings

Committees including, but not limited to, the Fair Housing Committee, COD and local meetings of the BoS CoC, conduct public meetings to solicit public input on the Housing and Community Development Program. All meetings are open to the public and participation is encouraged.

Public hearings are required by law in order to obtain the public's views and to provide the public with the City's responses to public questions and proposals. As stated earlier, the entity responsible for conducting public hearings for the Newton Housing and Community Development Program is the Planning and Development Board. As required by law, the Planning and Development Board holds at least two public hearings each year to solicit input on housing and community needs, to review proposed uses of funds and to assess how funds were spent during the previous program year.

The two public hearings are:

- Proposed Annual Action Plan public hearing (generally held in March or April)
- Annual performance public hearing for the proposed CAPER (generally held in September)

During the development of the Consolidated Plan and the Analysis of Impediments to Fair Housing Choice additional public hearings will be held.

The public hearings for the Consolidated Plan will cover:

- Proposed Citizen Participation Plan public hearing, where staff present proposed revisions to the existing Citizen Participation Plan;
- Needs Assessment public hearing for the Consolidated Plan, where staff describe the housing and community development needs that were identified through data analysis and community participation;
- Proposed Consolidated Plan public hearing, where staff reviews the content of the draft Consolidated Plan, including the amount of financial assistance the City expects to receive, the proposed projects that will be undertaken and the activities that will benefit low- and moderate income persons.

The public hearing for the Analysis of Fair Housing to Fair Housing Choice will cover:

- Disparities in housing opportunity that were identified through data analysis and community participation.
- Content, goals and strategies of the draft Analysis of Impediments to Fair Housing Choice.

In addition to the public hearings listed above, the Planning and Development Board will conduct a public hearing whenever a substantial change is proposed to the use of CDBG, HOME or ESG Program funds from that which was listed in the Consolidated Plan or Annual Action Plan.

A substantial Amendment is defined, in accordance with 24 CFR 91.505(a), as:

- A substantial change in allocation priorities (any change greater than 25 percent in an individual project's total budget) or a substantial change in the method of distribution of funds;
- A new activity (including those funded exclusively with program income) not previously covered by the Newton Consolidated Plan or Annual Action Plan; or a

- Substantial change in the purpose, scope, location or beneficiaries of an activity.

Public hearings are generally held at Newton City Hall and in locations that meets ADA accessibility standards. Reasonable accommodations will be made for people with disabilities upon request. Language interpreters will also be provided for non-English speaking participants upon advance notice.

Citizens and other interested parties may present oral comments at the time of the hearing and/or submit written comments for 30 days after the public hearing for the proposed Consolidated Plan, Annual Action Plan, Analysis of Impediments to Fair Housing Choice and any substantial or material changes and for 15 days after public hearings for the proposed Citizen Participation Plan and the CAPER. The City will consider the views of all citizens, organizations and agencies, and other interested groups in preparing the final Citizen Participation Plan, Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan and CAPER.

3. Notice of Meetings

All public meetings and public hearings are open to the public. Participation is encouraged. The following paragraphs describe the efforts that will be made to notify the public of public meetings and public hearings.

Public Meetings

Meeting notices are mailed or e-mailed to appointed members at least seven calendar days prior to meeting date. All meeting notices are posted on the Electronic Posting Board and Public Notice Board on the first floor of Newton City Hall within 48 hours of the scheduled meeting, and are listed in the Planning and Development Department's weekly "Friday Report," which is e-mailed or mailed to City officials, agency/organization representatives and residents.

Public Hearings of the Planning and Development Board

- Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan and CAPER

Public notices for public hearings for the proposed Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan, and CAPER will be advertised in the *Newton TAB* at least ten calendar days prior to each hearing. Meeting notices for the Consolidated Plan, Annual Action Plan, and CAPER will be e-mailed or mailed to Board members and posted on the Electronic Posting Board, the City webpage relevant to the subject matter (i.e. <http://www.newtonma.gov/fairhousing>), and the Public Notice Board, and broadcast on the television monitor, both located on the first floor of City Hall. Notice will also be provided on the City's website in the City Calendar and listed in the Planning and Development Department's weekly "Friday Report" which is e-mailed or mailed to City officials, agency/organization representatives and residents.

- Amendments to the Proposed Use of Funds

Notices for public hearings for amendments to the use of funds proposed in the Consolidated Plan and/or Annual Action Plan will be e-mailed or mailed to Board members. Notice will also be posted on the Electronic Posting Board, the Public Notice Board and broadcast on the television monitor on the first floor of City Hall. Notice will also be provided on the City's website in the City Calendar and

listed in the Planning and Development Department’s weekly “Friday Report” which is e-mailed or mailed to City officials, agency/organization representatives and residents.

4. Availability of the proposed Citizen Participation Plan, Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan, and CAPER

Notice of the availability of the proposed Citizen Participation Plan, Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan, and CAPER will be published in the *Newton TAB* at least ten calendar days prior to the public hearing. The notice will summarize the content and purpose of these proposed documents and will include a list of locations where copies of the documents may be examined. At a minimum, copies of the proposed Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan, and CAPER will be available in the Newton Housing and Community Development Office and on the Housing and Community Development Division’s section of the Planning and Development Department’s web page, located at <http://www.newtonma.gov/cdbg> and on the Planning and Development Department’s Special Reports and Studies web page: http://www.newtonma.gov/gov/planning/resources/special_reports_n_studies.asp.

5. Access to Information

In addition to opportunities to make oral comments at public meetings and/or public hearings before the Planning and Development Board, any citizen, organization, agency or other interested party may submit written requests for information and submit written comments regarding the proposed Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan, and CAPER, and/or amendments to each, including the proposed use of funds and the benefit to low- and moderate-income residents. Copies of documents will be made available in other languages and/or in other formats (i.e. larger print) upon request. Documents from prior years will also be available upon request for at least the preceding five years.

Additionally, plans to minimize displacement and assist those displaced as a result of the activities in the Consolidated Plan and the Annual Action Plan are attached to this document.

6. Comments

Citizens, organizations, agencies and other interested parties are encouraged to submit their comments on the proposed Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan and CAPER. All comment periods will begin the day of the public hearing held by the Planning and Development Board. Minimum comment periods are listed below:

Type of Public Hearing	Comment Period
Consolidated Plan	30 calendar days
Annual Action Plan	30 calendar days
CAPER	15 calendar days
Analysis of Impediments to Fair Housing Choice	30 calendar days
Substantial Amendments to Consolidated Plans and Annual Action Plans	30 calendar days

The City of Newton will consider all comments in preparing its final Citizen Participation Plan, Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan and CAPER for submission to HUD, and will include a summary of all comments received and the actions taken to address each comment.

Comments may be submitted via mail, e-mail or fax to:

Housing and Community Development Division
Newton Planning and Development Department
1000 Commonwealth Avenue
Newton, MA 02459
Fax: 617-796-1142
Phone: 617.796.1120, TDD/TTY 617-796-1089

7. Timely Response

The City of Newton will respond in writing within 15 calendar days to any written comments, questions or complaints received regarding the Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan, CAPER or the Newton Housing and Community Development Program in general.

8. Technical Assistance

Upon request, Newton Housing and Community Development Division staff will provide technical assistance to groups representing low- and moderate-income persons to develop funding requests for CDBG-, HOME- or ESG-eligible activities.

9. Use of the Citizen Participation Plan

The City of Newton will be required to adhere to this Citizen Participation Plan, once adopted, as the official mechanism for obtaining citizen input into the Consolidated Plan process and during the administration of the programs covered by this Plan.

10. Jurisdiction Responsibility

The requirements for citizen participation shall not restrict the responsibility or authority of the jurisdiction for the development and execution of its Consolidated Plan. The sole and final responsibility and authority to make determinations regarding the City's CDBG, HOME and ESG funding rests exclusively with the Mayor.

ANTI-DISPLACEMENT AND RELOCATION PLAN

(attached to the Citizen Participation Plan)

Permanent Relocation

It is the policy of the City of Newton Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) programs and the WestMetro HOME Consortium to take all reasonable steps to minimize displacement as a result of CDBG- and HOME-assisted projects, including:

- Considering whether displacement will occur during feasibility determinations
- Identifying potential relocation workload and resources early
- Assuring, whenever possible, that residential occupants of buildings rehabilitated are offered an opportunity to return
- Planning rehabilitation projects to include “staging” where this would eliminate temporary displacement
- Following notification procedures carefully so that families do not leave because they are not informed about planned projects or their rights

When a project does require relocation, in order to ensure the timely issuance of information notices to displaced households, etc., staff of the City of Newton Housing and Community Development Division or of the WestMetro HOME Consortium member communities will ensure that all notices are sent in compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA).

Temporary Relocation

Temporary relocation often occurs as the result of lead abatement and other rehabilitation activities in renter- and owner-occupied units. Although the City of Newton Housing and Community Development Division is not required to, in most cases it pays for the temporary relocation of displaced renters and/or homeowners whose residences are being rehabilitated.

CITIZEN PARTICIPATION PLAN

WESTMETRO HOME CONSORTIUM CITIZEN PARTICIPATION PLAN

REVISED MARCH 2018

The City of Newton, the lead entity for the WestMetro HOME Consortium, annually receives HOME Investment Partnerships Program (HOME) funds from U.S. Department of Housing and Community Development (HUD), which it administers on behalf of the WestMetro HOME Consortium member communities. The purpose of the HOME Program is to provide funds for a wide range of activities that create affordable housing opportunities for low- and moderate- income people. As a recipient of these formula grant funds, the HOME Consortium is required to produce the following documents:

- Consolidated Plan – a five-year plan that documents each community’s housing needs, outlines strategies to address those needs, and identifies proposed program accomplishments
- Annual Action Plan – an annual plan that describes specific HOME-funded projects that will be undertaken over the course of the upcoming fiscal year
- Consolidated Annual Performance and Evaluation Report (CAPER) – an annual report that evaluates the use of HOME funds
- Analysis of Impediments to Fair Housing Choice – a five-year plan that analyzes disparities in access to housing opportunities and identifies priorities and goals to address these issues.

This Citizen Participation Plan has been developed to provide citizens and other interested parties with opportunities to participate in an advisory role in the planning, implementation and evaluation of the HOME program and to review and comment on each of the documents listed above.

Citizen participation ranges from conducting needs assessments and strategic planning to project selection, development, implementation and evaluation. The Citizen Participation Plan outlines the City’s responsibility for providing opportunities for active citizen participation. The goals of the Citizen Participation Plan are to:

- Encourage citizen participation by all residents of the Consortium-member communities, emphasizing the involvement of low- and moderate-income residents, people with disabilities, minorities and residents of assisted housing;
- Inform citizens of the Consolidated Plan, Analysis of Impediments to Fair Housing Choice, and the Annual Action Plan, including funds available from the HOME program and eligible activities under the program;
- Give all citizens an opportunity to identify and respond to priority needs;
- Give all citizens an opportunity to identify and respond to priority proposed projects and the use of funds; and
- Give all citizens an opportunity to review and comment on program performance.

This is the overall Citizen Participation Plan for the WestMetro HOME Consortium. Member communities must meet the minimum requirements set forth herein. However, members are free to add opportunities for citizen participation beyond those required here.

Please note that the Consortium’s Consolidated Plan and subsequent Annual Action Plans will cover *only* housing planning and HOME programming for the Consortium member communities. The plans will also include Newton’s Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG)

programs, as well as planning and programming for other programs. The other Consortium members will develop separate *non-housing plans*, as appropriate, and these will be submitted to HUD with the Consortium Plan, but will be separate documents.

1. Process for Citizen Participation

Participation by citizens, agencies and other interested parties in the process of developing the Consortium's Citizen Participation Plan, Consolidated Plan, the Analysis of Impediments to Fair Housing Choice, Annual Action Plan, and CAPER and will be encouraged by both the Consortium and by individual member communities. All meetings and draft public documents will receive the broadest possible circulation and notice to encourage participation, especially by residents in the lowest income brackets, by minorities and non-English speaking persons, as well as persons with mobility, visual or hearing impairments. Each member will work with its local public housing authority to encourage the participation of public and assisted housing residents.

Reasonable accommodations will be made for people with disabilities upon request. Language interpreters will be provided for non-English speaking participants upon advance request.

2. Public Hearings

Public participation will be provided at the following public hearings to be held by the Consortium before the Newton Planning and Development Board at Newton City Hall in an accessible location. Hearings may be combined; however, no less than two public hearings will be conducted during the program year.

- Proposed Citizen Participation Plan public hearing
- Proposed Housing Needs public hearing
- Proposed Housing Strategies public hearing
- Proposed Consolidated Plan/Annual Action Plan public hearing
- Annual Performance Public Hearing for the proposed CAPER
- Proposed Analysis of Impediments to Fair Housing Choice public hearing

In addition to the public hearings listed above, member communities will also conduct public hearings in their own community whenever a substantial change is proposed to the use of HOME Program funds from that which was listed in the Consolidated Plan or Annual Action Plan. Member communities shall give notice of the proposed change to the City of Newton, which will submit the required notification to HUD once the hearing has been held and the change has been approved.

A substantial change is defined, in accordance with 24 CFR 91.505(a), as:

- A substantial change in allocation priorities (any change greater than 25 percent in an individual project budget) or a substantial change in the method of distribution of funds;
- An activity (including those funded exclusively with program income) not previously covered by the Consolidated Plan or Annual Action Plan; or a
- Substantial change in the purpose, scope, location or beneficiaries of an activity.

In addition to public hearings for a substantial change, additional hearings may be held by Consortium member communities to solicit input on proposed Plans.

Citizens and other interested parties may present oral comments at the time of the hearing and/or

submit written comments for 30 days after the public hearing for the proposed Consolidated Plan, Analysis to Fair Housing Choice, Annual Action Plan, and any substantial amendments, and for 15 days after public hearings for the proposed Citizen Participation Plan and CAPER. The Consortium will consider the views of all citizens, organizations and agencies, and other interested groups in preparing the final Citizen Participation Plan, Consolidated Plan, Annual Action Plan and CAPER.

3. Notice of Meetings

Public notices for public hearings for the proposed Citizen Participation Plan, Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan, and CAPER and will be advertised in the following newspapers at least ten days prior to each hearing.

Newspaper

- Newton TAB
- Bedford Minuteman
- Belmont Citizen Herald
- Brookline TAB
- Framingham TAB
- Lexington Minuteman
- Lincoln Journal
- Natick Bulletin
- Needham Times
- Sudbury Town Crier
- Waltham News Tribune
- Watertown TAB & Press
- Wayland Town Crier

Public notices for substantial changes will be advertised in the affected community's newspaper by the affected community at least seven days prior to the hearing.

Additionally, at a minimum, meeting notices for public hearings for the proposed Citizen Participation Plan, Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan and CAPER will be e-mailed or mailed to Planning and Development Board members and posted on the Electronic Posting Board and Public Notice Board, on the first floor of Newton City Hall within 48 hours of the scheduled meeting. Notice will also be provided on the front page of the City of Newton's website and listed in the Newton Planning and Development Department's weekly "Friday Report" which is e-mailed or mailed to City officials, agency/organization representatives and residents. Consortium member communities may supplement these outreach efforts.

4. Availability of the proposed Citizen Participation Plan, Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan and CAPER

Notice of the availability of the proposed Citizen Participation Plan, Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan, and CAPER will be published in the newspapers listed above at least ten days prior to the public hearing. The notice will summarize the purpose of these proposed documents and will include a list of locations where copies of the documents may be examined. At a minimum, copies of the proposed Citizen Participation Plan, Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan and CAPER will be available in the Newton Housing and Community Development Office and on the Housing and on the Community Development Division's section of the Newton Planning and Development Department's web page, located

at <http://www.newtonma.gov/gov/planning/hcd/default.asp>

5. Access to Information

In addition to opportunities to make oral comments at public hearings before the Newton Planning and Development Board, any citizen, organization, agency or other interested party may submit written requests for information and submit written comments regarding the proposed Citizen Participation Plan, Consolidated Plan, Analysis of Impediments to Fair Housing Choice,, Annual Action Plan and CAPER, and amendments to each, including the proposed use of funds and the benefit to low- and moderate-income residents. Copies of documents will be made available in other languages and/or in other formats (i.e. larger print) upon request. Documents from prior years will also be available upon request for at least the preceding five years.

Additionally, plans to minimize displacement and assist those displaced as a result of the activities in the Consolidated Plan and the Annual Action Plan are attached to this document.

6. Comments

Citizens, organizations, agencies and other interested parties are encouraged to submit their comments on the proposed Citizen Participation Plan, Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan and CAPER. All comment periods will begin the day of the public hearing held by the Newton Planning and Development Board. Minimum comment periods are listed below:

TYPE OF PUBLIC HEARING	COMMENT PERIOD
Consolidated Plan	30 calendar days
Analysis of Impediments to Fair Housing	30 calendar days
Annual Action Plan	30 calendar days
CAPER	15 calendar days
Substantial Changes	30 calendar days

The City of Newton, on behalf of the Consortium and working with member communities, will consider all comments in preparing its final Citizen Participation Plan, Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan and CAPER for submission to HUD, and will include a summary of all comments received and the actions taken to address each comment.

Comments may be submitted via mail, e-mail or fax to:

Rachel Powers, Community Development Program Manager
Newton Housing and Community Development Program
Planning and Development Department
1000 Commonwealth Avenue
Newton, MA 02459
E-mail: rpowers@newtonma.gov/ Fax: 617-796-1142

7. Timely Response

The City of Newton, on behalf of the Consortium and working with member communities, will respond in writing within 15 days to any written comments, questions or complaints received regarding the Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan, CAPER or the HOME Program in general.

8. Technical Assistance

Upon request, Consortium staff will provide technical assistance to groups representing low- and moderate-income persons to develop funding requests for HOME-eligible activities.

9. Use of the Citizen Participation Plan

The City of Newton and the HOME Consortium member communities will be required to adhere to this Citizen Participation Plan, once adopted, as the official mechanism for obtaining citizen input into the Consolidated Plan process and during the administration of the HOME Program covered by this Plan.

10. Jurisdiction Responsibility

The requirements for citizen participation shall not restrict the responsibility or authority of the City of Newton or the HOME Consortium member communities for the development and execution of the Consolidated Plan for the WestMetro HOME Consortium.

WESTMETRO HOME CONSORTIUM ANTI-DISPLACEMENT AND RELOCATION PLAN

Permanent Relocation

It is the policy of the City of Newton Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) programs and the WestMetro HOME Consortium to take all reasonable steps to minimize displacement as a result of CDBG- and HOME-assisted projects, including:

- Considering whether displacement will occur during feasibility determinations
- Identifying potential relocation workload and resources early
- Assuring, whenever possible, that residential occupants of buildings rehabilitated are offered an opportunity to return
- Planning rehabilitation projects to include “staging” where this would eliminate temporary displacement
- Following notification procedures carefully so that families do not leave because they are not informed about planned projects or their rights

When a project does require relocation, in order to ensure the timely issuance of information notices to displaced households, etc., staff of the City of Newton Housing and Community Development Division or of the WestMetro HOME Consortium member communities will ensure that all notices are sent in compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA).

Temporary Relocation

Temporary relocation often occurs as the result of lead abatement and other rehabilitation activities in renter- and owner-occupied units. Although the City of Newton Housing and Community Development Division is not required to, in most cases it pays for the temporary relocation of displaced renters and/or homeowners whose residences are being rehabilitated.

APPENDIX: PROVISION OF STANDARDS FOR ESG

City of Newton Emergency Solutions Grant

WRITTEN STANDARDS FOR PROVISION OF ESG ASSISTANCE

OVERVIEW

In accordance with federal regulations set forth in 24 CFR Part 567, the City of Newton's Department of Planning and Development has developed the following written standards guiding the provision and prioritization of Emergency Solutions Grant (ESG) funding.

The City of Newton receives ESG funds annually from the U.S. Department of Housing and Urban Development (HUD) under the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act), enacted into law on May 20, 2009. The ESG program supports eligible activities that enable communities to prevent homelessness, identify sheltered and unsheltered homeless persons, as well as those at-risk of homelessness, and provide the supportive services necessary to ensure that homeless individuals and families are rapidly-rehoused and move toward independent living.

ESG provides funding to: (1) engage homeless individuals and families living on the street; (2) improve the number and quality of emergency shelters for homeless individuals and families; (3) help operate these shelters; (4) provide essential services to shelter residents, (5) rapidly re-house homeless individuals and families, and (6) prevent families/individuals from becoming homeless.

Newton's ESG funds may be used for the following eligible program components:

- **Emergency Shelter Services-** Essential Services for individuals and families currently residing in an emergency shelter; Shelter Operations generally include such operating costs as maintenance, rent security, fuel, equipment, insurance utilities, and furnishings; Renovation of a building to serve or that currently serves as an emergency shelter.
- **Homelessness Prevention-** Housing relocation and stabilization services and/or short-and/or medium-term rental assistance necessary to prevent the individual or family from moving into an emergency shelter or meets HUD's homeless definition.
- **Rapid Re-housing-** Housing relocation and stabilization services and short-and/or medium-term rental assistance as necessary to help individuals and families currently living in an emergency shelter or other places not meant for human habitation move as quickly as possible into permanent housing and achieve stability in that housing.
- **Street Outreach-** Essential Services necessary to reach out to **unsheltered** homeless individuals and families, connect them with emergency shelter, housing, or critical services, and provide them with urgent, non-facility-based care.

Service providers contracted with the City of Newton to provide services in conjunction with the Emergency Solutions Grant must become thoroughly familiar with all regulations promulgated by the United States Department of Housing and Urban Development (HUD) governing the Emergency Solutions Grant Program and the enclosed written standards. [See, in particular, 24 CFR Part 576 – Emergency Solutions Grant Program.] The provider is responsible for implementing the service in accordance with these regulations. The following standards are essential, but are not exhaustive of HUD requirements.

I. Standard Policies and Procedures for Evaluating Individuals’ and Families’ Eligibility for Assistance under ESG

The Massachusetts Balance of State Continuum of Care (CoC) has developed and implemented a Coordinated Entry System, to facilitate the process of assessing the housing needs of individuals experiencing homelessness and meeting those housing needs. All applicants are processed through this standard centralized or coordinated assessment system, as required by HUD in 24 CFR 576.400(d). (Note: A victim service provider may choose not to use the Continuum of Care’s centralized or coordinated assessment system.) The goal of the Coordinated Entry process is to provide each consumer with adequate services and supports to meet their housing needs, with a focus on returning them to housing as quickly as possible.

ESG subrecipients and service providers, unless noted as an exception, are required to complete the BoS CoC Coordinated Entry Vulnerability Assessment, the Consent and Release Form and the Housing Preference Form. Assessment packets may be requested by calling DHCD at 617-573-1100 or downloaded from the CoC’s website at <http://www.mass.gov/hed/housing/stabilization/continuum-of-care-programs.html>. The evaluation contains the basic information about the barriers and vulnerabilities of each assessed person who has not yet been housed. Vulnerabilities incorporated into the list include length of homelessness, disabilities, and chronic medical conditions. Referrals to CoC funded Permanent Supportive Housing projects are made in order of vulnerability as vacancies occur.

Completed packets are then sent to Karla Sordia (the Coordinated Entry Registry), Federal Grants Management Unit, Massachusetts Department of Housing and Community Development (DHCD), 100 Cambridge Street, 3rd floor, Boston, MA 02114, or scanned and emailed to Karla.Sordia@state.ma.us. Once the project receives the referral from the Coordinated Entry Registry, they will arrange an intake interview. Coordinated Entry Staff will also contact the consumer to assure that the connection has been made. The project staff will review the referred person’s case for eligibility and may reject them only if they are found to be ineligible.

1a. Emergency Shelter

Applicants entering into the emergency shelter system must meet the HUD criteria for defining homelessness as described in 24 CFR 91.5 and 24 CFR 576.2 and in Attachment 1 entitled “Criteria for Defining Homelessness.” Clients will be prioritized within the shelter system based on need and available resources. Requirements are further described in Section IV.

1b. Street Outreach

Eligible clients include people who qualify as ‘unsheltered homeless,’ based on Category 1 (“Literally Homeless”) of the “homeless” definition found at 24 CFR 576.2 (and in Attachment 1, Criteria for Defining Homelessness). Services must coincide with requirements as outlined below in Section III and 24 CFR 576.101.

1c. Homelessness Prevention/Rapid Re-Housing

To be eligible for homelessness prevention, an applicant must meet the standards for r at-risk of homelessness as defined in 24 CFR 91.5 and 24 CFR 576.2. (Please also see Attachment 2, Criteria for Defining At-Risk of Homelessness) Further, applicants must have an annual income at or below 30% of Area Median Income (AMI).

FY 2018 Income Limits	
Household Size	30% Extremely-Low Income Limits
1	\$22,650
2	\$25,900
3	\$29,150
4	\$32,350
5	\$34,950
6	\$37,550
7	\$40,150
8	\$42,750

The standard that must be used for calculating annual income is established in 24 CFR 5.609. Applicants are eligible for future services only if they have no other housing subsidies from local, state, or federal sources and have no other viable resources to keep or obtain housing. The City of Newton may establish other priorities to be applied to applicants.

Program participants seeking rapid re-housing must meet HUD criteria for defining homelessness (Please see Attachment 1, Criteria for Defining Homelessness) and can be either be shelter or street homeless. If eligible, funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability. Furthermore, participants within the Brookline-Newton-Waltham-Watertown region will be prioritized for homelessness prevention and rapid rehousing assistance.

Id. Case Management and Re-evaluation

Every eligible program participant or household is to be assigned a case manager or referred to an agency within the community that can provide equivalent care. It is required that the case manager or agency have experience in working with people who are homeless or at-risk of homelessness.

The case manager must work directly with each participant or household, to accomplish the following:

- Determination of the appropriate type of service needed and the amount of financial assistance that is required using guidelines approved by the City of Newton;
- Development of both a short-term and long-term service plan;
- Counseling concerning housing needs;
- Monitoring and evaluating program participant progress, meeting no less than once a month to assist the participant's long-term housing stability needs;
- Credit repair (including credit counseling, budget management, debt management, and making realistic financial choices);
- Communication with landlords and utility companies;
- Assurance that program participants are receiving necessary services from essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service providers, including schools, child care services, legal services, financial resources, health and mental health services, dispute resolution, etc;
- Obtaining all needed local, state, and federal services to benefit the program participant, including public housing, employment assistance and job training, SNAP, SSI or SSDI, TAFDC, Medicaid [*MassHealth in Massachusetts*], WIC, etc. The Case Manager is responsible for referrals and working agreements for on-going collaboration and cooperation. All program participants must have full access to mainstream resources; and
- The development of a longer-term housing stability plan to extend beyond completion of ESG support is required.

Case managers assigned to homelessness prevention and rapid-rehousing programs must also re-evaluate the program participant's eligibility for services and the amount of financial assistance required:

- No less than every three months for participants receiving homelessness prevention assistance;
- No less than once annually for participants who are receiving rapid re-housing assistance; and

At a minimum, Re-evaluations of each program participants' eligibility must establish that:

- The program participant does not have an annual income that exceeds 30 %AMI, as determined by HUD; and
- The program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance.

II. Policies and procedures for coordination among providers

Recipients and subrecipients of Emergency Solutions Grants and funds authorized under the McKinney-Vento Homeless Assistance Act (Continuum of Care funding) must coordinate and integrate, to the maximum extent practicable, funded activities and services with mainstream housing, health, social services, employment, education, and youth programs for which homeless and at-risk families and

individuals may be eligible. Strategies must include continued collaboration between housing and service providers like the state Department of Mental Health, Department of Developmental Services, Department of Children and Families, Bureau of Substance Abuse Services, Newton Public Schools or applicable school district, local healthcare providers, transportation officials, workforce development, children/ family service providers and case management providers. Funded agencies will ensure that program participants access appropriate benefits and services, including, but not limited to Section 8, Public Housing, HOME Investment Partnership (HOME), the Workforce Investment Act, Women, Infants and Children Nutrition Program (WIC), the Supplemental Nutrition Assistance (SNAP) and Temporary Assistance for Needy Families (TANF) programs.

The City communicates and coordinates with the BoS CoC concerning all the relevant points of services to be provided, performance standards, and policies and procedures for the operation and administration of the HMIS. Additionally, funding allocations are aligned with the priorities, needs and strategies of the Continuum.

Except where statutorily exempt, all data on persons served and activities assisted under the Emergency Solutions Grant must be entered into the applicable community-wide Homeless Management Information System (HMIS) in accordance with the data and technical standards established by HUD. All staff must input pertinent data detailing all services provided into one uniform HMIS client data tracking system. In the case of victim services providers, however, data is to be entered into an alternative database. All data reported to HUD is to be compiled from HMIS or the alternative database. All provider agencies offering ESG services are responsible for overseeing the operation of the HMIS and assuring that all relevant data is entered in the system.

III. Standards for targeting and providing essential services related to street outreach

ESG funded **Street Outreach** targets unsheltered individuals and families within the Brookline-Newton-Waltham-Watertown geography. As set forth in 24 CFR 576.101, funding may be used to provide the essential services necessary to reach out to unsheltered homeless people, connect them with emergency shelter, housing, or critical services, and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. Eligible services consist of engagement, case management, emergency health and mental health services, services for special populations and transportation.

Subrecipients must determine an individual or family's vulnerability and/or ability to access emergency shelter, housing or health care facility to ensure that assistance is granted toward those demonstrating the greatest need. After the initial assessment of needs and eligibility, activities consist of providing crisis counseling, addressing urgent needs and actively connecting homeless persons to information, referrals and resources.

Funds may be used to provide services for special populations, including youth, victims of domestic violence and people with HIV/AIDS so long as the costs are eligible as defined above.

IV. Policies and Procedures for Admission, Diversion, Referral, Operation and Discharge by Emergency Shelters Assisted under ESG

The **Emergency Shelter Services** component of ESG, as set forth in 24 CFR 576.102, may be used to provide essential services to homeless families and individuals in emergency shelters, to renovate buildings to be used as emergency shelter for homeless families and individuals, and to operate emergency shelters. Services generally consist of case management, child care, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services and transportation.

Subrecipients and service providers must conduct the initial evaluation and determine if individuals and families meet one of the four (4) categories of homelessness, as detailed in the attached and further defined in 24 CFR 576.2. Following the evaluation and program triage, service providers must determine whether the participant is to be admitted to emergency shelter, diverted to a provider of other ESG-funded components, like homelessness prevention or rapid re-housing and/or connected to applicable supportive services and mainstream resources. Once admitted, emergency shelter program participants must be reassessed on an ongoing basis to determine the earliest possible time that they can be discharged into permanent housing. Subrecipients must work with program participants regularly in identifying their most critical needs, housing and stabilization options.

In accordance with HMIS policy, all data must be logged on services provided, referrals and discharges. Additionally, all facilities must meet the minimum standards with regards to sanitation, safety, habitability and access as specified in 24 CFR 576.403 and Section VIII of the enclosed ESG Written Standards.

Funds may be used to provide services for special populations, including youth, victims of domestic violence and people with HIV/AIDS so long as the costs are eligible as defined above.

V. Determining and Prioritizing which Eligible Families and Individuals will Receive Homelessness Prevention Assistance and which Eligible Families and Individuals will Receive Rapid Re-Housing Assistance

Unlike other interventions, Prevention occurs before a household falls into homelessness. It is recommended that the highest priority applicants for homelessness prevention would be those living in a habitable unit but who have been notified in writing that they are being evicted within 21 days after the date of their application for assistance. Newton ESG **Homelessness Prevention Program** Subrecipients are responsible for screening and determining eligibility for homelessness prevention. Eligibility for ESG services must be determined based on the eligibility criteria established by HUD. Households who do not meet required ESG eligibility standards are not eligible for services.

Newton's ESG **Rapid Rehousing Program** provides assists with rent, security deposit and other financial needs as well as supportive services to help people enter into an apartment. The highest priority applicants for rapid re-housing are those currently homeless persons for whom a potential living unit has been identified and will be available in less than a month. Participants within the Brookline-Newton-Waltham-Watertown region will be prioritized for homelessness prevention and rapid rehousing assistance.

The case manager assigned to the program participant is responsible for determining the type of assistance necessary, amount, and duration of housing stabilization or relocation services to provide a program participant. In addition, the case manager is to be responsible to determine the type of service

that is most appropriate for the program participant and the amount of financial assistance required. Financial assistance cannot be provided to persons who are already receiving the same type of assistance through other public sources. For instance, rental assistance cannot be provided to a person who is receiving tenant-based rental assistance or living in a housing unit receiving project-based rental assistance.

All housing must be determined to meet HUD’s minimum standards and requirements for habitability, sanitation, lead-based paint, and rent reasonableness.

Part of the financial evaluation of each participant is a calculation of net assets. Other than the value of an automobile and the worth of retirement savings accounts, if the participant has a net worth exceeding a threshold of \$15,000, the participant would need to pay 100% of rent, utilities, and other costs until his/her net worth drops below the threshold amount.

According to HUD policy, rental assistance cannot be provided if the rent exceeds the Fair Market Rent established by HUD, as provided under 24 CFR part 888, and must comply with HUD’s standard of rent reasonableness, as established under 24 CFR 982.507. The HUD Boston-Cambridge-Quincy Metro Fair Market Rents for FY18 and FY17 are identified below.

Final FY 2019 FMRs By Unit Bedrooms					
	<u>Efficiency</u>	<u>One-Bedroom</u>	<u>Two-Bedroom</u>	<u>Three-Bedroom</u>	<u>Four-Bedroom</u>
Final FY 2019 FMR	\$1,394	\$1,561	\$1,902	\$2,383	\$2,571
Final FY 2018 FMR	\$1,253	\$1,421	\$1,740	\$2,182	\$2,370

Eligible financial assistance may include housing search, rent application, security deposit, utility deposits, moving costs, first and last month’s rent and utility payments. A one-time payment of rental arrearage may be made for a period of up to six months. The provider may make rental assistance payments only to an owner with whom the provider has entered into a rental assistance agreement. The agreement must require that the owner provide a copy of any eviction action or any notice to the program participant to vacate the rental unit.

VI. Determining the Share of Rent and Utilities Costs that Each Program Participant Must Pay, if any, While Receiving Homelessness Prevention or Rapid Re-Housing Assistance

It is expected that negotiations will be held with all relevant parties at the outset to determine:

- a) The type of financial assistance required and agreement of amounts and method of payment;
- b) The proportion of financial participation by the program participant; and
- c) Other specific commitments of the program participant (e.g. to work toward self-sufficiency).

Determinations of the share of rent and utility costs to be paid on behalf of a program participant must be made on a case by case basis. Program participants are expected to contribute as great a share of the cost of rent and utilities as is affordable to them. In addition, they are required to seek alternative sources of financial assistance.

Financial assistance allocations are to be determined on a month to month basis for the first three month period. After three months, a complete re-evaluation of the program participant who has received homelessness prevention services must be conducted by the Case Manager to determine the program participant's eligibility for services and to determine the participant's ability to increase her/his share of rental payments. A similar re-evaluation must be conducted every three months thereafter, as long as the program participant receives financial assistance. If the service is rapid re-housing, a re-evaluation of program participant status (re: eligibility) is required no more than one year from the initial evaluation. At any point during the provision of financial assistance, the program participant must be declared ineligible for further assistance if her/his income exceeds 30% of the area median income as determined by HUD or if it is determined that the program participant has other resources or support networks that would allow her/him to retain the housing without ESG assistance.

Other than the possible exception of payment of first month's rent and a required security deposit, program participants are required to pay some portion of rent, minimally 30% of the program participant's income. Income will be calculated by totaling gross wages on pay stubs received by the participant after application to the program. The participant's share of rental payments ideally should increase incrementally throughout the period of assistance. Hardship waivers to reduce or forgo contributions can be granted in extreme circumstances at the discretion of the case manager and/or agency. Requests for waivers must be reviewed and approved by a supervisor, with the appropriate documentation kept on file.

VII. Standards for Determining How Long a Particular Program Participant will be provided with Financial Assistance and whether and How the Amount of that Assistance will be Adjusted Over Time

Rental assistance is to be provided for the least amount of time possible and will only be provided so long as the case manager determines it to be absolutely necessary in helping participant(s) regain stability in permanent housing. Normally, the maximum period of rental assistance will be nine months. Only in cases of extreme need will rental assistance will be provided for a full year. Regardless of the length of the period of subsidy, all program participants who are receiving rental assistance must have a legally binding, written lease for the rental unit that is between the owner and the program participant. A lease is not required in the case of a rental arrearage payment.

In general, assistance with utility payments is limited to emergencies, such as if it is necessary for a program participant to move into a new unit or if the utility arrearages are so great that a negotiated settlement must be made with the utility companies to avoid shut-off. Program participants must work with the case manager to negotiate a payment plan for utilities arrearages.

Meetings with the program participant, landlord or prospective landlord, and the case manager are to be held, as needed, to assure that the program participant or program participant household achieves stability in housing.

Due to the anticipated large number of eligible individuals and families seeking housing stabilization or relocation services, program participants may only receive benefits for one period of time, as determined by the case manager.

VIII. Habitability, Sanitation, Safety and Lead-Based Paint Standards

All ESG subrecipients and service providers must adhere to federally required standards to ensure that shelter and housing facilities are safe, sanitary, accessible and adequately maintained for program participants.

In accordance with 24 CFR 576.403, all units in which program participants are receiving emergency shelter or housing assistance must meet HUD Habitability and Lead-Based Paint Standards. Subrecipients are required to complete the ESG Minimum Habitability Standards Checklist and Lead Screening Worksheet (please see Attachments 3 and 4). The only exception to this requirement is in cases where **only** security deposits assistance and/or rental arrearage assistance is being provided.

Assisted units must meet federal lead paint requirements if the unit was constructed before 1978 and if a child under 6 and/or a pregnant woman is or will be residing in the unit. Subrecipients must document these inspections using the Habitability Checklist. The habitability and visual lead inspections are not required to be completed by certified inspectors, but the unit must comply with ALL standards on the checklist, otherwise the unit will not be eligible to grant assistance.

The inspection must include, at a minimum:

- Verification of age of structure;
- Visual assessment and confirmation that paint surfaces are not chipping, cracking or peeling using the Habitability Checklist; and
- Verification that the unit has been de-lead or paint encapsulated from a Massachusetts approved de-leading vendor.

If a HUD approved inspection for Section 8 has been recently completed for the unit, a copy of that inspection report in the client's file is sufficient because the regulations governing Section 8 inspections are more stringent than those governing ESG inspections. A lead-free certification for a unit can also be used to satisfy the lead paint requirement.

Subrecipients are highly encouraged to complete an online tutorial on completing lead based paint visual inspections which takes approximately 20 minutes to complete and is described at: <http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm>

Shelters must be accessible and should have a second means of exiting the facility in the event of an emergency. Every assisted facility must establish appropriate safeguards in order to meet the safety and shelter needs of special populations and enact the proper security precautions to those in its care. In addition, each shelter and housing unit must be maintained in a sanitary condition with each program participant having access to sanitary facilities that are clean and in proper operating condition.

IX. Fair Housing and Affirmative Outreach

Subrecipients and service providers must communicate and make known that the use of ESG funded facilities, assistance and services are available to all on a nondiscriminatory basis. Subrecipients are required to develop and implement affirmative outreach procedures and communication tools and materials in conformance with all federal, state and local fair housing statutes to inform persons without regard race, color, sex, age, disability, religious creed, familial status, national origin or ancestry, genetic information, marital status, veteran or military status, sexual orientation, gender identity or expression or status as a recipient of public and/or rental assistance, how to obtain access to facilities and services. Additional outreach measures must be taken to ensure that program outreach will reach those who wouldn't traditionally access such opportunities.

In addition, reasonable accommodations for persons with disabilities must be available in order to ensure disabled participants have an equal opportunity to utilize housing, including shelters, and receive essential services. Greater levels of accessibility may be required for some shelters in compliance with The Americans with Disabilities Act.

X. Matching Funds

Subrecipients must match 100% of awarded ESG funds from non-ESG sources. The matching requirement may be met with cash contributions and/or non-cash contributions, including the value of any real property, lease, equipment, goods, or services contributed to the organizations applying for ESG funds. Non-cash contributions may also include the purchase value of any donated building. Matching funds may also include salary paid to staff (not included in the ESG award) and time contributed by volunteers to carry out the project.

If matching contributions include funds from the Continuum of Care Program or another federal program, the applicant must ensure that all laws governing those federal funds are followed and that matching requirements do not prohibit those use of those funds for match.

XI. Termination of Assistance

As outlined in 24 CFR 576.402, the subrecipient may terminate assistance if the program participant has violated program requirements in accordance with a formal process established by the subrecipient. Termination of services may occur in situations where the participant violates program standards, misrepresents eligibility status, violates the lease agreement and engages in criminal activity. The subrecipient must exercise judgment, examine and document all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases. The termination must be preceded by a due process recognizing the rights of individuals affected, to include, at a minimum:

- Written notification and clear statement of reasons for termination from the program;
- Opportunity to appeal to a third party; and
- Prompt appeal response.

Participants who are terminated cannot re-apply for services until all outstanding issues are cleared to the satisfaction of the City of Newton.

Forms and Attachments

1. Criteria for Defining Homelessness
2. Criteria for Defining At-Risk of Homelessness
3. ESG Minimum Habitability Standards Checklists
4. ESG Lead Screening Worksheet
5. ESG Program Components Quick Reference
6. ESG Applicable Requirements for Rental Assistance and Housing Relocation and Stabilization Services Matrix
7. Balance of State CoC Coordinated Entry Forms

APPENDIX: FY21 BUDGETS

Newton Community Development Block Grant Program - FY21 Budget

PROJECT #	IDIS #	Env. Review	Key Org	Obj Code	Projects	Letter-of-Credit (LOC) Budget	FY21 Program Income (Estimated)	Prior Year(s) Program Income (FY20)	Prior Year(s) Entitlement Funds	Total Budget
HOUSING PROGRAM										
CD21-01A		Exempt	15002021	Various	Housing Program Delivery	\$288,800.40				\$288,800.40
CD21-01B		project by project	15002021	5796	Housing Rehabilitation and Development Program Fund (\$82,415.82 reserved for the NHA for rehabilitation on former CAN-DO portfolio via the Housing Rehabilitation Program)	\$870,000.00				\$870,000.00
CD21-01C		project by project	15002021	5796C	Housing Program Rehabilitation Revolving Fund (estimated rehab loan repayments)		\$65,000.00			\$65,000.00
HOUSING PROGRAM TOTAL						\$1,158,800.40	\$65,000.00	\$0.00	\$0.00	\$1,223,800.40
ARCHITECTURAL ACCESS										
CD21-03A		project by project	15002021	586001	Park Pathway Installation	\$52,000.00				\$52,000.00
CD21-03C		project by project	15002021	586001	FY21 Curb Cut Pool	\$44,560.00			\$31,882.33	\$76,442.33
ARCHITECTURAL ACCESS TOTAL						\$96,560.00	\$0.00	\$0.00	\$31,882.33	\$128,442.33
HUMAN SERVICES										
CD21-05A		Exempt	15002021	579700	Barry Price Rehabilitation Center / Building Independence and Self-Esteem Through Employment	\$15,000.00				\$15,000.00
CD21-05B		Exempt	15002021	579700	Boys and Girls Club /Financial Aid for Teens and Families	\$17,000.00				\$17,000.00
CD21-05C		Exempt	15002021	579700	St. Vincent de Paul/Housing Emergency Assistance	\$6,000.00				\$6,000.00
CD21-05D		Exempt	15002021	579700	Family ACCESS of Newton / Social Mobility for Young Families	\$48,000.00				\$48,000.00
CD21-05E		Exempt	15002021	579700	Horace Cousens Industrial Fund / Emergency Payment for Families in Financial Crisis	\$12,000.00				\$12,000.00
CD21-05F		Exempt	15002021	579700	2Life Communities / Caring Choices and Wellness Nursing for Low-Income Seniors	\$15,000.00				\$15,000.00
CD21-05G		Exempt	15002021	579700	Jewish Family & Children's Service/ Stabilization & Recovery Services for People with Mental Illness & Autism	\$408.00		\$15,000		\$15,408.00
CD21-05H		Exempt	15002021	579700	Newton Community Development Foundation / Resident Services Program	\$31,000.00				\$31,000.00
CD21-05I		Exempt	15002021	579700	Newton Housing Authority / Resident Services Program	\$33,410.00				\$33,410.00
CD21-05J		Exempt	15002021	579700	Plowshares Education Development Center / Tuition Assistance for Preschool and After School	\$15,000.00				\$15,000.00
CD21-05K		Exempt	15002021	579700	REACH / Individual Support and Advocacy including Emergency Hotline and Community Outreach	\$11,880.00				\$11,880.00
CD21-05L		Exempt	15002021	579700	Riverside Community Care / Mental Health Services Promoting Economic Mobility	\$50,000.00				\$50,000.00
CD21-05M		Exempt	15002021	579700	The Second Step / Residential and Community Programs for Survivors of Domestic Violence	\$35,000.00				\$35,000.00
CD21-98D		Exempt	15002021	579700	Human Service Program Income Reserve**** (for FY22 projects- do not include in FY21 budget totals)		\$15,000			
HUMAN SERVICES TOTAL (Cannot exceed 15% of current year LOC + 15% of prior year program income)						\$289,698.00	\$15,000.00	\$15,000.00	\$0.00	\$304,698.00
PROGRAM ADMINISTRATION										
CD21-09A		Exempt	15002021	Various	Program Administration	\$385,264.60	\$20,000.00			\$405,264.60
CD21-09B		Exempt	15002021	Various	Citizen Participation	\$1,000.00				\$1,000.00
CD21-99		Exempt	15002021	579700	Contingencies					\$0.00
STRATION TOTAL (Cannot exceed 20% of current year LOC + 20% of current year program income- must also include Planning activities)						\$386,264.60	\$20,000.00	\$0.00	\$0.00	\$406,264.60
GRAND TOTAL ALL PROGRAM AREAS						\$1,931,323.00	\$100,000.00	\$15,000.00	\$31,882.33	\$2,063,205.33
FY21 CDBG Letter of Credit Funds from HUD B-20-MC-25-0019						\$1,931,323.00				

* FY21 CDBG is a 1.17% increase from FY20 (\$1,908,942)

Newton Emergency Solutions Grants Program - FY21 Budget

Program Funding Vote Per Continuum of Care- unanimous vote on 12/6/19

ESG Review Committee Recommendations made on 2/27/20 and 3/2/20 (P&D Board subcommittee)

P&D Board Approval 4/6/20

Mayoral Approval May 2020

Project Number	Env. Review	IDIS #	ESG PROJECTS	KEY ORG	OBJ CODE	ACCOUNT TITLE	ESG Funds
HES21-01A	Exempt		Bristol Lodge Men's & Women's Shelters -- Middlesex Human Service Agency	21012021	579700	Grants	\$ 11,000.00
HES21-01B	Exempt		Transitional Residence Operations -- The Second Step, Inc.	21012021	579700	Grants	\$ 21,250.00
HES21-01C	Exempt		Shelter Services -- Community Day Center of Waltham	21012021	579700	Grants	\$ 16,500.00
HES21-01D	Exempt		Emergency Shelter Operations -- REACH	21012021	579700	Grants	\$ 21,250.00
HES21-02A	Exempt		Homelessness Prevention -- Brookline Community Mental Health Center	21012021	579700	Grants	\$ 49,670.78
HES21-02B	Exempt		Homelessness Prevention -- The Second Step	21012021	579700	Grants	\$ 6,500.00
HES21-03A	Exempt		Rapid Re-housing -- Brookline Community Mental Health Center	21012021	579700	Grants	\$ 23,383.17
HES21-04A	Exempt		HMIS -- REACH	21012021	579700	Grants	\$ 5,600.00
HES21-05A	Exempt		ESG Administration	21012021	579700	Grants	\$ 12,580.05
TOTAL							\$ 167,734.00
FY21 ESG Letter of Credit Funds E20-MC-25-0019							\$ 167,734.00

FY21 ESG is a 3.05% increase from FY20 (\$162,765)

WestMetro HOME Partnerships Program FY21 Projects

Project #	PROJECT NAME/TYPE	FY21 Budget	Uncommitted			Totals
			Prior Yr(s) Program Income	Prior Yr(s) Entitlement Funds	Anticipated FY21 Program Income	
BEDFORD						
HM21-01A	Bedford HOME Administration	\$ 1,550.00				\$ 1,550.00
HM21-01B/HM20-01B	Bedford TBRA	\$ 15,550.00		\$ 1,257.00		\$ 16,807.00
TOTAL		\$ 17,100.00	\$ -	\$ 1,257.00	\$ -	\$ 18,357.00
BELMONT						
HM21-02A/HM20-02A/HM19-02A	Belmont HOME Administration	\$ 5,075.00		\$ 7,959.46		\$ 13,034.46
HM21-02B/HM20-02B	Belmont Housing Dev. - Bradford Estates	\$ 50,775.00		\$ 44,080.00		\$ 94,855.00
TOTAL		\$ 55,850.00	\$ -	\$ 52,039.46	\$ -	\$ 107,889.46
BROOKLINE						
HM21-03A	Brookline HOME Administration	\$ 20,625.00				\$ 20,625.00
HM21-03B	Housing Development - BHA Strategic Preservation	\$ 206,175.00				\$ 206,175.00
HM20-03B/HM20-03P/HM19-03P	Housing Development - Longwood		\$ 243,528.75	\$ 209,400.00		\$ 452,928.75
HM21-03P	Brookline Program Income- reserved for HM22				\$ 100,000.00	\$ 100,000.00
TOTAL		\$ 226,800.00	\$ 243,528.75	\$ 209,400.00	\$ 100,000.00	\$ 779,728.75
CONCORD						
HM21-13A	Concord HOME Administration	\$ 2,600.00				\$ 2,600.00
HM21-13B/HM20-13B/HM19-13B/Consolidated Funds	Housing Development - Junction Village	\$ 25,900.00		\$ 485,498.40		\$ 511,398.40
TOTAL		\$ 28,500.00	\$ -	\$ 485,498.40	\$ -	\$ 513,998.40
FRAMINGHAM						
HM21-09A/HM21-09P	Framingham HOME Administration	\$ 24,450.00			\$ 1,750.00	\$ 26,200.00
HM21-09B/HM20-09D	Framingham Homeowner Rehabilitation	\$ 200,000.00	\$ 50,000.00	\$ 65,000.00		\$ 315,000.00
HM20-09B/HM19-09B & P/HM18-09P	Framingham Housing Development		\$ 86,448.62	\$ 248,450.00		\$ 334,898.62
HM21-09C/HM20-09C/HM19-09C/HM21-09P	Framingham TBRA Program	\$ 44,500.00		\$ 73,169.45	\$ 23,250.00	\$ 140,919.45
TOTAL		\$ 268,950.00	\$ 136,448.62	\$ 386,619.45	\$ 25,000.00	\$ 817,018.07
LEXINGTON						
HM21-12A	Lexington HOME Administration	\$ 3,000.00				\$ 3,000.00
HM21-12B	Lexington Projects / Programs	\$ 30,040.00				\$ 30,040.00
TOTAL		\$ 33,040.00	\$ -	\$ -	\$ -	\$ 33,040.00
NATICK						
HM21-11A	Natick HOME Administration	\$ 4,550.00				\$ 4,550.00
HM21-11B/HM20-11B/HM19-11B	Natick TBRA Program (includes Sudbury Loan Repayment)	\$ 52,830.00		\$ 91,980.00		\$ 144,810.00
TOTAL		\$ 57,380.00	\$ -	\$ 91,980.00	\$ -	\$ 149,360.00
NEEDHAM						
HM21-05A	Needham HOME Administration	\$ 2,900.00				\$ 2,900.00
HM21-05B/HM20-05B	Needham Projects / Programs	\$ 29,000.00		\$ 25,050.00		\$ 54,050.00
TOTAL		\$ 31,900.00	\$ -	\$ 25,050.00	\$ -	\$ 56,950.00
NEWTON						
HM21-06A	Newton HOME Administration	\$ 11,802.24				\$ 11,802.24
HM21-06B/HM20-06B/HM18-06P	Newton Projects/ Programs	\$ 118,102.40		\$ 137,040.96		\$ 255,143.36
TOTAL		\$ 129,904.64	\$ -	\$ 137,040.96	\$ -	\$ 266,945.60
SUDBURY						
HM21-10A	Sudbury HOME Administration	\$ 725.00				\$ 725.00
HM21-10B	Loan Repayment to Natick (\$7,250)	\$ -				\$ -
TOTAL		\$ 725.00	\$ -	\$ -	\$ -	\$ 725.00
WALTHAM						
HM21-07A	Waltham HOME Administration	\$ 16,575.00				\$ 16,575.00
HM21-09B/HM20-07B/HM19-07B/HM21-07P	Waltham TBRA Program	\$ 145,770.00		\$ 237,317.54	\$ 100,000.00	\$ 483,087.54
HM21-09C/HM21-07P/HM20-07P/HM19-07P	Waltham Program Income- Beaverbrook Apts- 280-324 Grove Street	\$ 20,000.00	\$ 99,471.48	\$ 338,433.52	\$ 100,000.00	\$ 557,905.00
TOTAL		\$ 182,345.00	\$ 99,471.48	\$ 575,751.06	\$ 200,000.00	\$ 1,057,567.54
WATERTOWN						
HM21-08A	Watertown HOME Administration	\$ 8,925.00				\$ 8,925.00
HM21-08B/HM20-08B/HM17-08B	Watertown Projects / Programs	\$ 89,100.00		\$ 347,203.35		\$ 436,303.35
HM21-08P	Watertown Program Income- reserved for HM22				\$ 25,000.00	\$ 25,000.00
TOTAL		\$ 98,025.00	\$ -	\$ 347,203.35	\$ 25,000.00	\$ 470,228.35
WAYLAND						
HM21-14A	Wayland HOME Administration	\$ 825.00				\$ 825.00
HM21-14B/HM20-14B	Wayland TBRA Program	\$ 8,280.00		\$ 11,020.00		\$ 19,300.00
TOTAL		\$ 9,105.00	\$ -	\$ 11,020.00	\$ -	\$ 20,125.00
CONSORTIUM ADMINISTRATION						
HM21-99	Consortium HOME Administration	\$ 44,400.96				\$ 44,400.96
HM21-15A	Competitive Funding Pool	\$ -				\$ -
HM21-15B	CHDO Operating Expenses Funding Pool	\$ 74,001.60				\$ 74,001.60
HM20-15B1	Metro West Collaborative CHDO Operating Funds			\$ 50,000.00		\$ 50,000.00
HM21-15C	CHDO Set Aside Funding Pool	\$ 222,004.80		\$ 70,408.26		\$ 292,413.06
TOTAL		\$ 340,407.36	\$ -	\$ 120,408.26	\$ -	\$ 460,815.62

TOTAL FY21 HOME CONSORTIUM BUDGET \$ 1,480,032.00 \$ 479,448.85 \$ 2,443,267.94 \$ 350,000.00 \$ 4,752,748.79

Entitlement Funds Current Year	Uncommitted PI & HP Prior Year(s)	Uncommitted EN, CR, CO & PA Prior Year(s)	Anticipated PI During FY21	All Available Resources
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HOME Consortium Letter of Credit Funds M20-DC25-0213 \$ 1,480,032.00

FY21 HOME is a 3.41% increase from the FY20 Allocation of \$1,431,246

APPENDIX: IDIS REPORT PR-01 HOME

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF COMMUNITY PLANNING AND DEVELOPMENT
PR01 - HUD Grants and Program Income

DATE: 3/16/2020

TIME: 1:07:53 PM

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IDIS

Program	Fund Type	Grantee Name	Grantee State Code	Grant Number	Authorized Amount	Suballocated Amount	Amount Committed to Activities	Net Drawn Amount	FY YTD Net Draw Amount	Available to Commit	Available to Draw	Recapture Amount					
HOME	EN	NEWTON	MA	M92DC250213	\$1,490,000.00	\$533,114.70	\$956,885.30	\$956,885.30	\$0.00	\$0.00	\$0.00	\$0.00					
				M93DC250213	\$986,000.00	\$282,918.00	\$703,082.00	\$703,082.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
				M94DC250213	\$910,000.00	\$373,743.37	\$536,256.63	\$536,256.63	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
				M95DC250213	\$982,000.00	\$319,850.00	\$662,150.00	\$662,150.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
				M96DC250213	\$933,000.00	\$520,345.75	\$412,654.25	\$412,654.25	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
				M97DC250213	\$907,000.00	\$379,482.09	\$527,517.91	\$527,517.91	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
				M98DC250213	\$977,000.00	\$571,764.44	\$405,235.56	\$405,235.56	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
				M99DC250213	\$1,049,000.00	\$790,466.33	\$258,533.67	\$258,533.67	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
				M00DC250213	\$1,056,000.00	\$709,458.33	\$346,541.67	\$346,541.67	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
				M01DC250213	\$1,170,000.00	\$419,055.58	\$750,944.42	\$750,944.42	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
				M02DC250213	\$1,264,000.00	\$374,333.00	\$889,667.00	\$889,667.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
				M03DC250213	\$1,690,494.00	\$495,906.50	\$1,194,587.50	\$1,194,587.50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
				M04DC250213	\$1,848,132.00	\$738,380.87	\$1,109,751.13	\$1,109,751.13	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
				M05DC250213	\$1,679,934.00	\$407,647.53	\$1,272,286.47	\$1,272,286.47	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
				M06DC250213	\$2,155,694.00	\$557,866.94	\$1,597,827.06	\$1,597,827.06	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
				M07DC250213	\$2,144,366.00	\$339,744.86	\$1,804,621.14	\$1,804,621.14	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
				M08DC250213	\$2,051,376.00	\$595,317.75	\$1,456,058.25	\$1,456,058.25	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
				M09DC250213	\$2,279,312.00	\$569,828.00	\$1,709,484.00	\$1,709,484.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
				M10DC250213	\$2,263,634.00	\$638,670.73	\$1,624,963.27	\$1,624,963.27	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
				M11DC250213	\$2,044,347.00	\$574,697.45	\$1,469,649.55	\$1,469,649.55	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
				M12DC250213	\$1,229,930.00	\$259,513.16	\$970,416.84	\$970,416.84	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
				M13DC250213	\$1,211,784.00	\$248,056.40	\$963,727.60	\$963,727.60	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
				M14DC250213	\$1,239,898.00	\$371,219.23	\$868,678.77	\$868,678.77	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
				M15DC250213	\$1,125,677.00	\$343,516.35	\$782,160.65	\$782,160.65	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
				M16DC250213	\$1,143,994.00	\$343,198.20	\$697,794.80	\$617,035.58	\$95,697.00	\$103,046.32	\$183,760.22	\$0.00	\$0.00				
				M17DC250213	\$1,160,828.00	\$487,874.64	\$602,681.06	\$243,837.83	\$235,606.33	\$70,272.30	\$429,115.53	\$0.00	\$0.00				
				M18DC250213	\$1,597,353.00	\$479,205.90	\$0.00	\$0.00	\$0.00	\$1,118,147.10	\$1,118,147.10	\$0.00	\$0.00				
				M19DC250213	\$1,431,246.00	\$407,811.50	\$0.00	\$0.00	\$0.00	\$1,023,434.50	\$1,023,434.50	\$0.00	\$0.00				
				NEWTON Subtotal:					\$40,021,999.00	\$13,132,987.60	\$24,574,111.18	\$24,134,554.05	\$331,303.33	\$2,314,900.22	\$2,754,457.35	\$0.00	
				PI	NEWTON	MA	M97DC250213	\$100,403.01	\$0.00	\$100,403.01	\$100,403.01	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	
							M98DC250213	\$9,201.48	\$0.00	\$9,201.48	\$9,201.48	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
							M99DC250213	\$29,346.15	\$0.00	\$29,346.15	\$29,346.15	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
							M00DC250213	\$111,956.65	\$0.00	\$111,956.65	\$111,956.65	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
							M01DC250213	\$355,321.43	\$0.00	\$355,321.43	\$355,321.43	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
M02DC250213	\$170,184.80	\$0.00	\$170,184.80				\$170,184.80	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
M03DC250213	\$187,601.30	\$0.00	\$187,601.30				\$187,601.30	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
M04DC250213	\$149,716.78	\$0.00	\$149,716.78				\$149,716.78	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
M05DC250213	\$91,271.46	\$0.00	\$91,271.46				\$91,271.46	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
M06DC250213	\$331,902.35	\$0.00	\$331,902.35				\$331,902.35	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
M07DC250213	\$143,621.81	\$0.00	\$143,621.81				\$143,621.81	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
M08DC250213	\$84,288.03	\$0.00	\$84,288.03				\$84,288.03	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
M09DC250213	\$105,593.91	\$0.00	\$105,593.91				\$105,593.91	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
M10DC250213	\$45,489.01	\$0.00	\$45,489.01				\$45,489.01	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
M11DC250213	\$298,639.88	\$0.00	\$298,639.88				\$298,639.88	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
M12DC250213	\$24,738.65	\$0.00	\$24,738.65				\$24,738.65	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
M13DC250213	\$132,135.36	\$0.00	\$132,135.36				\$132,135.36	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
M14DC250213	\$406,622.93	\$0.00	\$406,622.93				\$406,622.93	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
M15DC250213	\$298,025.29	\$0.00	\$298,025.29				\$298,025.29	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
M16DC250213	\$124,599.57	\$0.00	\$124,599.57				\$124,599.57	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
M17DC250213	\$10,880.10	\$0.00	\$10,880.10				\$10,880.10	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00				
M18DC250213	\$65,732.49	\$0.00	\$65,732.49	\$48,366.00	\$38,263.00	\$0.00	\$17,366.49	\$0.00	\$0.00								
M19DC250213	\$212,551.26	\$21,255.13	\$2,043.00	\$2,043.00	\$2,043.00	\$189,253.13	\$189,253.13	\$0.00	\$0.00								

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF COMMUNITY PLANNING AND DEVELOPMENT
PR01 - HUD Grants and Program Income

DATE: 3/16/2020
TIME: 1:07:53 PM
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IDIS

Program	Fund Type	Grantee Name	Grantee State Code	Grant Number	Authorized Amount	Suballocated Amount	Amount Committed to Activities	Net Drawn Amount	FY YTD Net Draw Amount	Available to Commit	Available to Draw	Recapture Amount
HOME	PI	NEWTON	MA	NEWTON Subtotal:	\$3,489,823.70	\$21,255.13	\$3,279,315.44	\$3,261,948.95	\$40,306.00	\$189,253.13	\$206,619.62	\$0.00
				PI Subtotal:	\$3,489,823.70	\$21,255.13	\$3,279,315.44	\$3,261,948.95	\$40,306.00	\$189,253.13	\$206,619.62	\$0.00
	PA	NEWTON	MA	M19DC250213	\$21,255.13	\$0.00	\$21,255.13	\$0.00	\$0.00	\$0.00	\$21,255.13	\$0.00
				NEWTON Subtotal:	\$21,255.13	\$0.00	\$21,255.13	\$0.00	\$0.00	\$0.00	\$21,255.13	\$0.00
				PA Subtotal:	\$21,255.13	\$0.00	\$21,255.13	\$0.00	\$0.00	\$0.00	\$21,255.13	\$0.00
	IU	NEWTON	MA	M17DC250213	\$380,268.00	\$0.00	\$380,268.00	\$380,268.00	\$58,298.67	\$0.00	\$0.00	\$0.00
				NEWTON Subtotal:	\$380,268.00	\$0.00	\$380,268.00	\$380,268.00	\$58,298.67	\$0.00	\$0.00	\$0.00
				IU Subtotal:	\$380,268.00	\$0.00	\$380,268.00	\$380,268.00	\$58,298.67	\$0.00	\$0.00	\$0.00
	HP	NEWTON	MA	M15DC250213	\$165,087.60	\$0.00	\$165,087.60	\$165,087.60	\$0.00	\$0.00	\$0.00	\$0.00
				M16DC250213	\$558,266.35	\$0.00	\$558,266.35	\$558,266.35	\$0.00	\$0.00	\$0.00	\$0.00
				M17DC250213	\$282,510.00	\$0.00	\$282,510.00	\$282,510.00	\$0.00	\$0.00	\$0.00	\$0.00
				M18DC250213	\$595,170.93	\$0.00	\$475,901.56	\$341,233.50	\$10,932.00	\$119,269.37	\$253,937.43	\$0.00
				M19DC250213	\$216,716.35	\$0.00	\$45,790.00	\$0.00	\$0.00	\$170,926.35	\$216,716.35	\$0.00
				NEWTON Subtotal:	\$1,817,751.23	\$0.00	\$1,527,555.51	\$1,347,097.45	\$10,932.00	\$290,195.72	\$470,653.78	\$0.00
				HP Subtotal:	\$1,817,751.23	\$0.00	\$1,527,555.51	\$1,347,097.45	\$10,932.00	\$290,195.72	\$470,653.78	\$0.00
GRANTEE					\$45,731,097.06	\$13,154,242.73	\$29,782,505.26	\$29,123,868.45	\$440,840.00	\$2,794,349.07	\$3,452,985.88	\$0.00

APPENDIX: CITIZEN COMMENTS + RESPONSES



Regional Housing Services Office

Serving Acton, Bedford, Concord, Lexington, Lincoln, Sudbury, Wayland, and Weston

Office Address: 37 Knox Trail, Acton, MA 01720
Phone: (978) 287-1092

Website: WWW.RHSOhousing.org
Email: INFO@RHSOhousing.org

January 29, 2020

John Stella
PO Box 543
Bedford, MA 01730

Dear John,

I am writing in response to your letter to the City of Newton regarding the FY21-FY25 Consolidated Plan for the WestMetro HOME Consortium of which Bedford is a member.

The FY21-FY25 HOME Consolidated Plan provides a planning framework for the HOME funds allocated to Bedford. In the past, Bedford has been allocated approximately \$20,000 per year through the HOME Program, which is likely to stay somewhat constant. This level of funding is more aptly suited to renovation and smaller projects, which is why Bedford plans to utilize the HOME funds for improvements at the Bedford Housing Authority units, and their Tenant-Based Rental Assistance Program – both of which serve low income households.

Your letter references the need for low income veteran's housing. As you may know, Bedford is a leader in the state in providing low income housing for veterans with 130 units dedicated to providing permanent, supportive housing for homeless Veterans and those at imminent risk of homelessness.

And lastly, the Town of Bedford and its residents were able to substantially influence the design of the residential development at the former Coast Guard property. Through community workshops, public meetings and numerous town meeting articles, the Coast Guard property was developed for homeownership condominiums, of which 4 are permanently restricted to low income households.

Thank you for taking the time to participating in the planning process for the FY21-FY25 HOME Consolidated Plan.

Please feel free to contact me further if you have additional comments,

Sincerely,

Elizabeth Rust
Agent for Bedford

CC: Amanda Berman, Director of Housing and Community Development
Alyssa Sandoval, Bedford Economic Development Director

Tiffany Leung

From: Amanda Berman
Sent: Thursday, February 06, 2020 3:31 PM
To: Barney Heath; Girard Plante
Cc: Tiffany Leung; Jini Fairley; robpcaruso@yahoo.com
Subject: RE: Planning Board Public Hearing on Monday, February 3, 2020

Thank you so much Girard for attending Monday night's public hearing, and for the follow-up email.

On April 6th, we will be back in front of the Planning & Development Board for another public hearing. This presentation will include our FY21 Annual Action Plan, which will outline the human service and emergency solutions grant allocations for the upcoming program year.

Please let us know if you have any additional questions.

Best,

Amanda Berman
Director of Housing & Community Development
Department of Planning & Development
City of Newton
617-796-1147 (Direct)
617-796-1120 (Dept)
aberman@newtonma.gov
www.newtonma.gov/gov/planning

From: Barney Heath <bheath@newtonma.gov>
Sent: Tuesday, February 4, 2020 5:40 PM
To: Girard Plante <gap4peace@aol.com>
Cc: Amanda Berman <aberman@newtonma.gov>; Tiffany Leung <tleung@newtonma.gov>; Jini Fairley <jfairley@newtonma.gov>; robpcaruso@yahoo.com
Subject: RE: Planning Board Public Hearing on Monday, February 3, 2020

Thanks Girard for the kind words and coming to our meeting last night. We appreciate the feedback.

Barney S. Heath
Director of Planning and Development
City of Newton, MA
617-796-1120

From: Girard Plante <gap4peace@aol.com>
Sent: Tuesday, February 04, 2020 11:03 AM
To: Barney Heath <bheath@newtonma.gov>
Cc: Amanda Berman <aberman@newtonma.gov>; Tiffany Leung <tleung@newtonma.gov>; Jini Fairley <jfairley@newtonma.gov>; robpcaruso@yahoo.com
Subject: Planning Board Public Hearing on Monday, February 3, 2020

[DO NOT OPEN links/attachments unless you are sure the content is safe.]

Staffers of Planning and Development Department -

Kudos to each of you for working on the exhaustive, comprehensive Consolidated Plan!

The expansive document is startling in its various community problems that mirror many similar 'societal' situations across America.

While these particular problems plague the West Metro municipalities listed in the Plan, no matter peoples' socioeconomic background, I am troubled by the numerous ways that they must daily live.

Last night's discussion of the Plan focused primarily on income disparities and affordable accessible housing.

You never dove into the stark realities confronting individuals and families dealing with homelessness, domestic violence, drug addiction, suicide, food disparities and more.

My sense after reading the Plan is that most Newton residents lacking knowledge of the problems that require health and human services, intervention by various social service agencies and entities for an array of personal problems, will be stunned to learn such problems exist within the affluent communities.

In addition, I applaud the earnest efforts of the many people staffing the agencies/entities that are daily prepared to respond to unsettling albeit real-life matters such as domestic violence, safe

houses, sexual assault, stalking, and so on.

In spite of my near-four decades active involvement in my respective communities, myriad knowledge attained from my advocacy work, I was not aware the Consolidated Plan includes a vast network of agencies/entities that cover health and human services and social services counselors ready to respond to the unique needs certain individuals are confronting.

It is reassuring to know a vast network is in place to assist in the vexing problems too many people struggle with. I shall keep all that in mind as my advocacy brings me to all manner of dire situations.

Will you be holding a public hearing that focuses primarily on the above matters in the future? I believe it's vital information despite the delicate issues and alarming problems.

Peace,

Girard A. Plante, Journalist
Accessibility Specialist

2/17/2020

To Planning and Development Department & Board:

I would like to provide some comments on the Draft Consolidated Plan for 2021-25.

My major concern has to do with coordination of the funds received from ESG & CDBG. I believe that a more thoughtful drafting of the RFPs for both programs; closer monitoring of the subrecipients; and collaboration between the ESG & CDBG providers will provide better outcomes. I support coordination of the goals for both ESG and CDBG recipients. If the greatest needs are not being met by a subrecipient, then the program ought not to be funded.

Based on the identified needs, what are the best ways to maximize the impact of the ESG and CDBG funds?

1. If 58% of households, who are housing cost burdened, fall at or below 50% AMI, then a commensurate % of ESG and CDBG funds should be targeted to this group even if HUD allows services to moderate income folk;
2. Since the total number of low-to-moderate-income owner households, that are housing cost burdened, 62% are elderly, ESG and CDBG funds should target this population, not with fitness programs, but with case management to determine if the homeowner is eligible for public programs and resources to decrease their burden – programs like the city’s tax assistance program & reduced water/sewer bills; fuel assistance; accessory apartments; and housing rehabilitation;
3. If the “lack of affordable (<50% AMI) and accessible units in Newton is creating instability for persons with disabilities and seniors”, we should prioritize funding and/or develop ways to supplement the housing assistance to these populations – like the Tenant Based Rental Assistance, provided by Bedford, Framingham, Natick, Waltham and Wayland;
4. Since the City’s Inclusionary Zoning Ordinance (effective 1/1/2021) does not assure that **all** market-rate and mixed income projects will include units at or below 50% AMI, we may find that the above rental assistance program could meet this need.

The report states that Brookline Community Mental Health Center uses ESG funds to work with the Brookline Housing Authority. I would strongly suggest that BCMHC have an agreement with the Newton Housing Authority as well. It should be a goal that BCMHC use its expertise to assist Newton in forming a similar coalition to the one established in Brookline to provide a safety net program.

Middlesex Human Service Agency and Community Day Center of Waltham use ESG funds to support the homeless population. Due to their locations, in an adjacent community, I would like to see – as a goal – that both set up satellite office hours with a Newton-based organization such as TSS or Family Access.

When issuing the RFP, “the City of Newton will convene local providers from the former BNWW CoC, as well as representatives from the BoS CoC, to discuss the allocation of ESG funds among the program’s eligible components.” In theory this is a great idea, but it keeps the funds within a small group of providers and may miss the opportunity to have new subrecipients in the mix. Perhaps there should be a goal of increasing the pool of local providers when discussing the allocation of funds.

I think the idea of collaboration amongst subrecipients of **both** ESG and CDBG is crucial to getting the best outcomes from the funds administered. Brown-bag sessions are a good opportunity to form a network of human service **and** housing providers to better meet the goals of the Consolidated Plan. Going forward, both groups of subrecipients should come together, at a minimum, for quarterly meetings **and** the quarterly reports submitted to Planning and Development should more clearly collect information about collaboration to maximize the impact of the limited funds and prevent a small group of individuals and families.

Thank you including these comments with your plan.

Kathy Laufer

26 Mosman Street, W. Newton



Ruthanne Fuller
Mayor

City of Newton, Massachusetts
Department of Planning and Development
1000 Commonwealth Avenue Newton, Massachusetts 02459

Telephone
(617) 796-1120
Telefax
(617) 796-1142
TDD/TTY
(617) 796-1089
www.newtonma.gov

Barney Heath
Director

June 11, 2020

Kathy Laufer
26 Mosman Street
West Newton, MA 02465

RE: Draft FY21-25 Consolidated Plan for Newton and the WestMetro HOME Consortium

Dear Ms. Laufer:

The City of Newton is in receipt of your comments and thanks you for your feedback relative to the City of Newton's Draft FY21-25 Consolidated Plan. The Department of Planning and Development has carefully reviewed your recommendations and has addressed your concerns below.

- 1.) **Comment:** My major concern has to do with coordination of the funds received from ESG & CDBG. I believe that a more thoughtful drafting of the RFPs for both programs; closer monitoring of the subrecipients; and collaboration between the ESG & CDBG providers will provide better outcomes. I support coordination of the goals for both ESG and CDBG recipients. If the greatest needs are not being met by a subrecipient, then the program ought not to be funded.

Department Response: Staff has been working closely with the Commissioner of Health & Human Services and her staff to refine the RFP's for both the Human Services and ESG programs, to better align the requests for proposals with the City's identified needs. For the FY21 Human Service RFP, an important change was made to remove the program's sole emphasis on economic mobility in exchange for services and/or interventions that focus on supporting and enhancing the lives of vulnerable low- and moderate-income and presumed eligible residents across the lifespan. The three key priority areas identified in the RFP were: 1.) Enrichment and Care for Vulnerable Youth, 2.) Stability and Self-Sufficiency for Vulnerable Adults, and 3.) Promoting Economic Security and Vitality for Older Adults.

Additionally, the review process was streamlined and included a two-step process, where staff from both the Planning & Development Department and Health & Human Services Department came together to review and rank each proposal, with a priority given to proposals that demonstrated a strong return on investment in terms of community impact, as well as the development of significant program outcomes, among other metrics. The review committee also focused on the proposals' connection to the three priority areas, and sub-priorities, identified in the Request for Proposals.

Additionally, in FY19, staff kicked off the Consolidated Planning process with two brown bag lunches for the Human Service and ESG subrecipients to initiate stronger coordination and knowledge sharing amongst these organizations, as well as the City. These sessions were highly productive for the participants and staff plans to implement these sessions on a more regular basis.

While staff monitors all subrecipients on a quarter basis, through the detailed review of quarterly reports, regular communication with each subrecipient provides staff with critical information on the program's successes and challenges throughout the year. This regular communication strengthens relationships and allows staff to anticipate issues that may arise with a subrecipient. Annually, staff conducts a risk assessment to determine which subrecipients are to be formally monitored according to HUD's guidelines, which includes an on-site visit to the agency's site.

- 2.) **Comment:** Based on the identified needs, what are the best ways to maximize the impact of the ESG and CDBG funds? If 58% of households, who are housing cost burdened, fall at or below 50% AMI, then a commensurate % of ESG and CDBG funds should be targeted to this group even if HUD allows services to moderate income folk.

Department Response: Approximately 48% of households who are housing cost burdened (>30% of income spent on housing costs) in Newton have incomes at or below 50% AMI and approximately 16% of households in Newton who are housing cost burdened have annual incomes between 50% and 80% AMI (moderate-income).

ESG funds are only available to individuals and households that are currently homeless or at-risk of homelessness and have an annual income at or below 30% AMI.

While the Newton Housing Partnership and Planning & Development Board have discussed the concept of targeting CDBG funds to residents and households at or below 50% AMI, no concrete policy has been put in place at this time. This will surely be a conversation that the City continues to have with each affordable housing project that seeks CDBG and HOME funds; however, I do not foresee staff recommending that Human Service funds be targeted in such a strict way, as the need for these services is very present amongst moderate-income residents, as well as those who are extremely low- and low-income in Newton.

- 3.) **Comment:** Since the total number of low-to-moderate-income owner households, that are housing cost burdened, 62% are elderly, ESG and CDBG funds should target this population, not with fitness programs, but with case management to determine if the homeowner is eligible for public programs and resources to decrease their burden – programs like the city's tax assistance program & reduced water/sewer bills; fuel assistance; accessory apartments; and housing rehabilitation.

Department Response: In FY21, the City of Newton will support Riverside Community Care's mental health services, which promote the health, wellbeing and self-sufficiency of children, adults, and elders. Through CDBG's Human Services program, Riverside Community Care will provide outpatient mental health and case management services to vulnerable low-income youth, adults and elders in Newton. While CDBG funded the City's Senior Services fitness program in FY20, this program will not receive CDBG funding in FY21.

- 4.) **Comment:** If the “lack of affordable (<50% AMI) and accessible units in Newton is creating instability for persons with disabilities and seniors”, we should prioritize funding and/or develop ways to supplement the housing assistance to these populations – like the Tenant Based Rental Assistance, provided by Bedford, Framingham, Natick, Waltham and Wayland;

Department Response: Staff and the Newton Housing Partnership have continued to discuss ways in which to support the creation, rehabilitation and preservation of affordable units at or below 50% AMI. We seek to support new development of affordable units at this level with CDBG and HOME funds; and the City’s new Inclusionary Zoning ordinance, updated in summer 2019, requires private developers to provide a percentage of a project’s units at 50% AMI. The need for units at this level, and for these specific populations, is ever present and continued efforts must be undertaken to create the critical units, through increased funding, changes in zoning, creative public-private partnerships, and more effective advocacy for a diversity of housing throughout Newton. Tenant Based Rental Assistance (TBRA), however, continues to be a challenge in a market like Newton, where the subsidy needed to support one household is so large. The City’s previous TBRA program served three households, and only one of those households was able to find permanent housing in Newton. Staff will continue to assess this program, but at this time, we feel strongly that our HOME dollars are put to better use through the creation of new units.

- 5.) **Comment:** Since the City’s Inclusionary Zoning Ordinance (effective 1/1/2021) does not assure that **all** market-rate and mixed income projects will include units at or below 50% AMI, we may find that the above rental assistance program could meet this need.

Department Response: Effective August 1, 2019, the City’s updated Inclusionary Zoning ordinance requires the following: For rental Inclusionary Housing Projects with 10 or more residential dwelling units, where two or more rental Inclusionary Units are required at Tier 1 (50%-80% AMI), the AMI used for establishing rent and income limits for these Inclusionary Units must average no more than 65% of AMI. Alternatively, at least 50% of such units may be priced for households having incomes at 50% of AMI and the remaining Inclusionary Units may be priced for households at 80% of AMI. With Inclusionary Housing projects, we tend to see most developers choosing to provide half of the Tier 1 units at 50% AMI and half at 80% AMI, with the occasional 65% AMI unit.

- 6.) **Comment:** The report states that Brookline Community Mental Health Center uses ESG funds to work with the Brookline Housing Authority. I would strongly suggest that BCMHC have an agreement with the Newton Housing Authority as well. It should be a goal that BCMHC use its expertise to assist Newton in forming a similar coalition to the one established in Brookline to provide a safety net program.

Department Response: Staff will explore this concept with Brookline Community Mental Health Center; however, it should be noted that Newton Housing Authority residents due rely on BCMHC’s ESG funds.

- 7.) **Comment:** Middlesex Human Service Agency and Community Day Center of Waltham use ESG funds to support the homeless population. Due to their locations, in an adjacent community, I would like to see – as a goal – that both set up satellite office hours with a Newton-based organization such as TSS or Family Access.

Department Response: Staff will explore this concept with these organizations; however, it should be noted that these subrecipients have strong working relationships and often refer clients to each other on a regular basis.

- 8.) **Comment:** When issuing the RFP, “the City of Newton will convene local providers from the former BNWW CoC, as well as representatives from the BoS CoC, to discuss the allocation of ESG funds among the program’s eligible components.” In theory this is a great idea, but it keeps the funds within a small group of providers and may miss the opportunity to have new subrecipients in the mix. Perhaps there should be a goal of increasing the pool of local providers when discussing the allocation of funds.

Department Response: Staff will consider this recommendation.

- 9.) **Comment:** I think the idea of collaboration amongst subrecipients of **both** ESG and CDBG is crucial to getting the best outcomes from the funds administered. Brown-bag sessions are a good opportunity to form a network of human service **and** housing providers to better meet the goals of the Consolidated Plan. Going forward, both groups of subrecipients should come together, at a minimum, for quarterly meetings **and** the quarterly reports submitted to Planning and Development should more clearly collect information about collaboration to maximize the impact of the limited funds and prevent a small group of individuals and families.

Department Response: In FY19, staff kicked off the Consolidated Planning process with two brown bag lunches for the Human Service and ESG subrecipients to initiate stronger coordination and knowledge sharing amongst these organizations, as well as the City. These sessions were highly productive for the participants and staff plans to implement these sessions on a more regular basis. We will consider bringing the ESG and Human Service subrecipients together, rather than hold separate sessions for the two programs.

The final version of the Consolidated Plan will be submitted to HUD by June 30, 2020. Your comments and the Planning Department’s response will be included within the appendices of that final document.

Thank you again for your comments and your participation in the planning process for the FY21-25 Consolidated Plan. If you have any questions, please don’t hesitate to reach me at aberman@newtonma.gov or (617) 796-1147.

Sincerely,



Amanda Berman
Director of Housing and Community Development

Cc: Mayor Ruthanne Fuller
Barney Heath, Director of Planning & Development
Planning & Development Board

Tiffany Leung

From: Amanda Berman
Sent: Monday, March 2, 2020 5:26 PM
To: Tiffany Leung; Kevin McCormick
Subject: RE: CDBG funds

Hi Kevin,
I'm so sorry for the delay! Please see my notes in red below.

The Consolidated Plan is a document that represents the City of Newton, as well as the other twelve WestMetro HOME Consortium communities. While entitlement communities like Waltham are required to submit to HUD their own Consolidated Plan as it relates specifically to the use of their CDBG funds, our ConPlan is the place where these communities are required to discuss the use of their HOME funds. Many of the communities provide detail in this plan on other housing projects and programs (not necessarily funded by HOME) that complement the projects and programs funded through HOME. Some of the communities tend to provide more detail than others.

Please let us know if you have any other questions.

Best,

Amanda Berman
Director of Housing & Community Development
Department of Planning & Development
City of Newton
617-796-1147 (Direct)
617-796-1120 (Dept)
aberman@newtonma.gov
www.newtonma.gov/gov/planning

From: Tiffany Leung <tleung@newtonma.gov>
Sent: Monday, February 24, 2020 9:09 AM
To: Kevin McCormick <mc.sail@verizon.net>
Cc: Amanda Berman <aberman@newtonma.gov>
Subject: RE: CDBG funds

Hi Kevin,

Thank you for taking a very close look at the draft Consolidated Plan. Appreciate your feedback. Amanda and I will look over these pages and make the appropriate changes.

Tiffany Leung
Community Development Planner
Department of Planning & Development
City of Newton
617-796-1146 (Direct)
617-796-1120 (Dept)
www.newtonma.gov/gov/planning

From: Kevin McCormick <mc.sail@verizon.net>
Sent: Friday, February 21, 2020 2:49 PM
To: Tiffany Leung <tleung@newtonma.gov>
Subject: RE: CDBG funds

[DO NOT OPEN links/attachments unless you are sure the content is safe.]

Tiffany,

Thanks for getting back to me. Here are the places I found CDBG for other communities

Page 96, bottom paragraph, "City of Waltham CDBG Lead Loan Program"

As Tiffany mentioned, Waltham is an entitlement community and receives its own CDBG funds, which it uses to fund this program. The City of Newton is not responsible for the administration / management of Waltham's CDBG funds.

Page 98, middle of first paragraph, "CDBG funded lead paint program" that I think is Waltham

Same comment as above.

Page 124, last line, "CDBG funding" that is Waltham

Same comment as above. Waltham is an entitlement community and receives its own CDBG funds each year, which it uses to fund these program.

Page 146, second last paragraph, "CDBG funding"

Same comment as above.

Page 148, last paragraph, "CDBG"

Same comment as above, however, some of the services that are discussed in this paragraph are funded through HOME.

Page 165, second paragraph, whole paragraph discusses CDBG funded program for Waltham

Same comment as above.

Kevin

From: Tiffany Leung [<mailto:tleung@newtonma.gov>]
Sent: Friday, February 21, 2020 10:33 AM
To: Kevin McCormick
Cc: Amanda Berman; Gabriel Holbrow
Subject: RE: CDBG funds

Hi Kevin,

I hope this email finds you well. Amanda is away this week, but Gabriel mentioned that you had a question about the draft Consolidated Plan.

You are correct. Newton's CDBG funds must be spent in Newton, and projects must specifically benefit low- and moderate-income people in Newton. HOME funds are received on behalf of the 13-member WestMetro HOME Consortium. Lastly, because of our relationship with Brookline, Waltham, and Watertown from the former Continuum

of Care, ESG funds be used to serve homeless individuals and families or those at-risk of homelessness living in the four communities.

Waltham, Brookline, and Framingham, while they are part of the WestMetro HOME Consortium, they are also entitlement communities like Newton. So as a standalone community, they also receive their own CDBG funds from HUD. They do not use Newton's CDBG funds.

That might not have been clear in the Consolidated Plan. Do you mind pointing out the specific section(s) or page(s) that calls out the use of CDBG funds by Waltham and Brookline? We will be sure to clarify in the final draft.

Many thanks,
Tiffany Leung
Community Development Planner
Department of Planning & Development
City of Newton
617-796-1146 (Direct)
617-796-1120 (Dept)
www.newtonma.gov/gov/planning

From: Gabriel Holbrow <gholbrow@newtonma.gov>
Sent: Friday, February 21, 2020 10:21 AM
To: Tiffany Leung <tleung@newtonma.gov>
Cc: Amanda Berman <aberman@newtonma.gov>
Subject: FW: CDBG funds

Dear Tiffany,

Thanks for talking with me just now about Mr. McCormick's question on the Consolidated Plan. Here is his email with his question(s).

Gabriel Holbrow

From: Kevin McCormick <mc.sail@verizon.net>
Sent: Friday, February 21, 2020 9:36 AM
To: Gabriel Holbrow <gholbrow@newtonma.gov>
Subject: RE: CDBG funds

[DO NOT OPEN links/attachments unless you are sure the content is safe.]

Gabriel,

Thanks

Sometime next week is fine

Kevin

From: Gabriel Holbrow [<mailto:gholbrow@newtonma.gov>]
Sent: Friday, February 21, 2020 8:55 AM
To: Kevin McCormick
Cc: Amanda Berman
Subject: RE: CDBG funds

Dear Mr. McCormick,

Amanda is indeed out this week. We expect her back on Monday, February 21.

I am not familiar enough with the Consolidated Plan to directly answer your question. (Honestly, my way of answering your question, if the answer had to come from me, would be... to first ask Amanda.) However, I believe that Amanda will be able to explain when she returns.

Gabriel Holbrow

Community Planner – Engagement Specialist
Department of Planning & Development
City of Newton

gholbrow@newtonma.gov
(617) 796-1140
Room B10, 1000 Commonwealth Avenue
Newton, Massachusetts 02459-1449

From: Kevin McCormick <mc.sail@verizon.net>
Sent: Thursday, February 20, 2020 5:10 PM
To: Gabriel Holbrow <gholbrow@newtonma.gov>
Subject: FW: CDBG funds

Gabriel

Amanda has not gotten back to me concerning my email below. Perhaps she is out this week or very busy. And maybe I should go through you for these type of messages. Does that make sense in the future?

The reason that I am asking about Newton's CDBG is that the Draft Consolidated Plan mentions CDBG funding that is being used in other communities such as Waltham and Brookline and I want to know if those CDBG funds are from Newton or through the other communities. If the funds do not come from Newton I don't think they should be in Newton's Con Plan.

Thanks

Kevin McCormick

From: Kevin McCormick [<mailto:mc.sail@verizon.net>]
Sent: Monday, February 17, 2020 9:58 PM
To: Amanda Berman (aberman@newtonma.gov)
Subject: CDBG funds

Amanda,

I have question about Newton's CDBG Funds. I know that the HOME funds are spent by all members of the Consortium and the ESG funds can go to different organizations in the Continuum of Care. But I thought the CDBG funds that Newton receives would only be spent within Newton. Is that true?

Kevin McCormick

When responding, please be aware that the Massachusetts Secretary of State has determined that most email is public record and therefore cannot be kept confidential.

When responding, please be aware that the Massachusetts Secretary of State has determined that most email is public record and therefore cannot be kept confidential.

UNITING CITIZENS FOR HOUSING AFFORDABILITY (U-CHAN)
53B TAFT AVENUE
WEST NEWTON, MA 02465
617-543-8097

January 21, 2020

Amanda Berman, Director of Housing and Community Development
Department of Planning and Development
Newton City Hall
1000 Commonwealth Avenue
Newton, MA 02459

Dear Ms. Berman.

I am writing to submit information which U-CHAN believes should be considered as the Housing Department composes its DRAFT of the 2021-2025 Consolidated Plan.

Many of us for many years have been disappointed and frustrated at the lack of participation in the public meetings by the direct beneficiaries of the human service programs and housing projects funded by the federal funds. We do not believe it is because they are disinterested rather it has been due to meetings being held at a time not convenient for them to attend i.e. middle of the day when they are working or evening when they would need to have childcare.

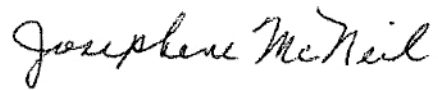
This year we decided that we would seek an alternative way to seek their input – a survey. To that end we contracted with a Brandeis student under the supervision of Tatjana Meschede, Ph.D. Associate Director, Institute on Assets and Social Policy (IASP), Senior Scientist/Senior Lecturer at the Heller School for Social Policy and Management at Brandeis University to prepare an online survey which would be used by (1) nonprofits that service this population and (2) managers of housing subsidized by public funds. Those nonprofits and property managers distributed the surveys. While the number of respondents was limited – 28 -; it is substantial compared to the number of attendees at the Planning Department public presentations. So we think the data are meaningful.

We included questions in the survey about (1) family income; (2) housing and neighborhood, including experience of homelessness ; (3) transportation; (4) employment need/desires.; (5) perceived social supports and (6) connection with the community. With the assistance of our Brandeis collaborators, we compiled what we consider the most important

results in a summary report that is attached. I hope that you will consider them as you prepare the draft.

Please feel free to contact me if you have need of any further information. We have more results than those highlighted in the report and would be happy to share them with you.

Sincerely,

A handwritten signature in cursive script that reads "Josephine McNeil".

Josephine McNeil
Co-Chair U-CHAN

Cc: Ruthanne Fuller, Mayor
Barney Heath, Director of Planning and Development Department
Peter Doeringer, Planning and Development Board Chair
Susan Albright, President of City Council

U-CHAN (UNITING CITIZENS FOR AFFORDABLE HOUSING IN NEWTON)
53B TAFT AVENUE
WEST NEWTON, MA 02465
PHONE: 617-543-8097
EMAIL: jomac1941@aol.com

April 13, 2020

Deborah Crossley, Chair
Zoning and Planning Committee (ZAP)
Newton City Hall
1000 Commonwealth Avenue
Newton, MA 02459

RE: FY 21-25 Consolidated Plan and FY 21 Annual Action Plan

Dear Ms. Crossley,

It is my understanding that ZAP will be asked to ratify the FY 21-25 Consolidated Plan and the FY'21 Annual Action Plan (the "Plans"). By and large this will be a perfunctory exercise given the need to submit the Plans to HUD by May 15th. Despite that U-CHAN would like to highlight several shortcomings in the Plans. We are of the opinion that even though the expenditure of these funds are within the total prerogative of the Mayor, you the city council should be concerned about the housing and human services needed by the citizens of Newton, especially the most needy.

1. FY 21-25 Consolidated Plan
 - a. Citizen Participation Plan –

- i. In recognition of past failures to include the voices of low-income residents of affordable housing, we commissioned a survey of low-income residents in Several subsidized housing projects, public housing Units and units created by inclusionary housing in Newton. Results of that survey are included in the survey results and letter to the Planning Department transmitting those results. – *the results of those survey are not included in the plan.*
- ii. Public notices are to be sent to TAB; it is not clear that TAB will be published long term – *alternate notice method should be included.*
- iii. Access to drafts only online – *at least five copies should be placed in Newton library with at least 3 available for limited circulation.*

b. Needs Assessment

i. Human Services

The attached survey mentioned above, identified two areas of need most identified by the low-income residents were housing supports and services related to increasing their economic status such as help with preparing cover letters, Resumes and interviewing skills i.e. pathways to economic mobility – *this need was not included in Newton’s Strategic Plan section of the plan.*

ii. Housing

The assessment identifies those individuals and families who are most housing cost burdened are those with incomes below 50% of the AMI – *Newton does not prioritize its use of federal funds for this population.*

FY'21 Annual Action Plan

1. Citizens Participation Plan

a. The Newton Housing Partnership (NHP) is mentioned as playing a central role in review of CDBG, HOME funds and activities – *with respect to housing proposal, the NHP's advice should be sought earlier in the vetting process.*

b. Written communications to Planning Department will receive written response within 15 days – *that process in not being followed.*

2. The City Council is the final citizen policy board to review and take action – *the timing of the submission is too late for meaningful input; they should receive interim reports so they are in a position to make knowledgeable decisions in a short period of time.*

3. Human Services

The plan shows the ESG funds are awarded to many sub recipients but not broken down by community – *quarterly reports from sub recipients should include data by community including race and ethnicity and amount Awarded or what purpose.*

4. HOME Funding for Housing

No plans shown for use of funds in Newton – *HOME funds should be used for tenant based rental assistance program with economic mobility funding.*

In closing, U-CHAN believes that the City Council has among its numerous responsibilities; the care of its citizens, especially the most vulnerable, even if that care is being paid for by federal funds as opposed to Newton taxes.

Therefore, we recommend that the City Council request the Planning Department make a detailed and comprehensive report to ZAP

(housing) and the Programs and Services committee (human services) over the next several months to address the shortcomings above and others. It is possible for the Plans to be changed by a process called “Substantial Change”; if it is determined that changes should be made to better serve the needs of Newton’s low and moderate income citizens.

Thank you for your attention to these matters. They are especially important now in light of the devastation that is being inflicted upon the low income population by COVID 19.

In the recently passed CARES ACT congress appropriated additional CDBG and ESG funds specifically to assist persons whose housing is impacted as a consequence of the virus. The City of Newton will receive additional funds at the same rate it currently receives for those funds.

Please feel free to contact me with any questions.

Sincerely,

Josephine McNeil
Co-chairperson of U-CHAN

Cc: Mayor Ruthanne Fuller
Barney Heath, Director of Planning and Development
Amanda Berman, Manager of the Housing Department
Peter Doeringer, Chair of the Planning and Development Board



Ruthanne Fuller
Mayor

City of Newton, Massachusetts
Department of Planning and Development
1000 Commonwealth Avenue Newton, Massachusetts 02459

Telephone
(617) 796-1120
Telefax
(617) 796-1142
TDD/TTY
(617) 796-1089
www.newtonma.gov

Barney Heath
Director

June 11, 2020

Josephine McNeil
U-CHAN (UNITING CITIZENS FOR AFFORDABLE HOUSING IN NEWTON)
53B Taft Avenue
West Newton, MA 02465

RE: Draft FY21-25 Consolidated Plan for Newton and the WestMetro HOME Consortium

Dear Ms. McNeil:

The City of Newton is in receipt of your comments and thanks you for your feedback relative to the City of Newton's Draft FY21-25 Consolidated Plan. The Department of Planning and Development has carefully reviewed your recommendations and has addressed your concerns below.

- 1.) **Comment:** FY 21-25 Consolidated Plan - Citizen Participation Plan: In recognition of past failures to include the voices of low-income residents of affordable housing, we commissioned a survey of low-income residents in several subsidized housing projects, public housing Units and units created by inclusionary housing in Newton. Results of that survey are included in the survey results and letter to the Planning Department transmitting those results. – *the results of those survey are not included in the plan.*

Department Response: Staff received, reviewed, and considered the survey results and the results of this survey are included in this final version of the FY21-25 Consolidated Plan.

- 2.) **Comment:** FY 21-25 Consolidated Plan - Citizen Participation Plan: Public notices are to be sent to TAB; it is not clear that TAB will be published long term – *alternate notice method should be included.*

Department Response: Staff will provide for alternative notice methods if and when the TAB is no longer published. In the meantime, as listed in the Citizen Participation Plan, we take the following measures to advertise and post notices of public hearings:

- Meeting notices for the Consolidated Plan, Annual Action Plan, and CAPER will be e-mailed or mailed to Planning & Development Board members and posted on the Electronic Posting Board, the City webpage relevant to the subject matter (i.e. <http://www.newtonma.gov/fairhousing>), and the Public Notice Board, and broadcast on the television monitor, both located on the first floor of City Hall.

- Notice will also be provided on the City’s website in the City Calendar and listed in the Planning and Development Department’s weekly “Friday Report” which is e-mailed or mailed to City officials, agency/organization representatives and residents.
- While this is not included in the CPP, staff also emails notices of public hearings related to these plans to the Newton Housing Partnership, Fair Housing Committee, and all current and past ESG and Human Services subrecipients.

3.) **Comment:** FY 21-25 Consolidated Plan - Citizen Participation Plan: Access to drafts only online – *at least five copies should be placed in Newton library with at least 3 available for limited circulation.*

Department Response: Staff published the final draft of the FY21-25 Consolidated Plan in the midst of the coronavirus pandemic, in which all Planning Department staff were working remotely, and the Newton Library was closed to the public.

4.) **Comment:** Needs Assessment – Human Services: The attached survey mentioned above, identified two areas of need most identified by the low-income residents were housing supports and services related to increasing their economic status such as help with preparing cover letters, Resumes and interviewing skills i.e. pathways to economic mobility – *this need was not included in Newton’s Strategic Plan section of the plan.*

Department Response: As detailed in the Needs Assessment section of the Plan, of the public service needs identified through the Consolidated Planning process, many coincided with housing such as landlord education and supportive services to maintain successful tenancy. Supportive services include assistance with basic needs and life skills, financial literacy, and mental health services. Other public service needs identified include financial assistance for security deposits and first and last month’s rent, access to affordable childcare, legal services, home care for the elderly, and job training. Another public service need that often came up throughout the needs assessment sessions was the need for better transportation options for low- to moderate-income individuals and families to allow access to services and programs, as well as the need for translation and interpretation services for non-English speaking individuals and families.

In FY21, the Human Service program will emphasize services and/or interventions that focus on supporting and enhancing the lives of vulnerable low- and moderate-income and presumed eligible residents across the lifespan. The three key priority areas identified in the FY21 Human Service Request for Proposals (RFP) were: 1.) Enrichment and Care for Vulnerable Youth, 2.) Stability and Self-Sufficiency for Vulnerable Adults, and 3.) Promoting Economic Security and Vitality for Older Adults.

As detailed in the FY21 Human Service RFP, proposals falling under Priority Area Two “should provide services and/or interventions to vulnerable adults ages 19-61 years, designed to provide critical support, training, and services that encourage stable and independent lives with recognition that a comprehensive approach might include education, job training, family supports, supportive housing, financial literacy, physical and mental health, and special population support. Programs should focus on and describe how they will create one or more of the following outcomes:

- Promote career preparation and family support with an emphasis on jobs that pay self-sustaining and/or family-sustaining wages.
- Promote increased stability for populations who are at the highest risk of “falling through the cracks” including interventions for becoming more independent once stabilized.

- Provide physical and/or mental health services that meet a need otherwise unlikely to be met.

5.) **Comment:** Needs Assessment – Housing: The assessment identifies those individuals and families who are most housing cost burdened are those with incomes below 50% of the AMI – *Newton does not prioritize its use of federal funds for this population.*

Department Response: ESG funds are only available to individuals and households that are currently homeless or at-risk of homelessness and have an annual income at or below 30% AMI.

While the Newton Housing Partnership and Planning & Development Board have discussed the concept of targeting CDBG funds to residents and households at or below 50% AMI, no concrete policy has been put in place at this time. Staff and the Newton Housing Partnership have continued to discuss ways in which to support the creation, rehabilitation and preservation of affordable units at or below 50% AMI. We seek to support new development of affordable units at this level with CDBG and HOME funds; and the City’s new Inclusionary Zoning ordinance, updated in summer 2019, requires private developers to provide a percentage of a project’s units at 50% AMI. The need for units at this level, and for these specific populations, is ever present and continued efforts must be undertaken to create the critical units, through increased funding, changes in zoning, creative public-private partnerships, and more effective advocacy for a diversity of housing throughout Newton.

6.) **Comment:** FY21 Annual Action Plan – Citizen Participation Plan: The Newton Housing Partnership (NHP) is mentioned as playing a central role in review of CDBG, HOME funds and activities – *with respect to housing proposal, the NHP’s advice should be sought earlier in the vetting process.*

Department Response: Staff will continue to work with the Newton Housing Partnership to review affordable housing projects that seek federal and local funds. Staff will continue to encourage developers to present proposed projects to the NHP early on in the development review process so the Partnership has the ability to positively impact the outcome of a project.

7.) **Comment:** FY21 Annual Action Plan – Citizen Participation Plan: Written communications to Planning Department will receive written response within 15 days – *that process is not being followed.*

Department Response: As stated in the Citizen Participation Plan, “Citizens and other interested parties may present oral comments at the time of the hearing and/or submit written comments for 30 days after the public hearing for the proposed Consolidated Plan, Annual Action Plan, Analysis of Impediments to Fair Housing Choice and any substantial or material changes and for 15 days after public hearings for the proposed Citizen Participation Plan and the CAPER... The City of Newton will respond in writing within 15 calendar days to any written comments, questions or complaints received regarding the Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan, CAPER or the Newton Housing and Community Development Program in general... The City of Newton will consider all comments in preparing its **final** Citizen Participation Plan, Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan and CAPER **for submission to HUD**, and will include a summary of all comments received and the actions taken to address each comment.”

Staff acknowledged the receipt of all comments during the 30 day public comment period and provided in this final version of the Consolidated Plan to be submitted to HUD is a summary of all the comments received, as well as the actions taken to address each comment, of which this letter is a part.

8.) **Comment:** FY21 Annual Action Plan: The City Council is the final citizen policy board to review and take action – *the timing of the submission is too late for meaningful input; they should receive interim reports so they are in a position to make knowledgeable decisions in a short period of time.*

Department Response: Staff will consider this proposal; however, Councilors are in communication with staff throughout the year to inquire about the specifics of our federal programs and subrecipients.

9.) **Comment:** FY21 Annual Action Plan – Human Services: The plan shows the ESG funds are awarded to many sub recipients but not broken down by community – *quarterly reports from sub recipients should include data by community including race and ethnicity and amount.*

Department Response: Staff will consider this proposed change to our ESG quarterly reports.

10.) **Comment:** FY21 Annual Action Plan – HOME Funding for Housing: No plans shown for use of funds in Newton – *HOME funds should be used for tenant based rental assistance program with economic mobility funding.*

Department Response: At this time, staff is in communication with 2Life Communities regarding its Golda Meir House Expansion Project. 2Life will seek Newton HOME dollars to support the creation of additional affordable senior units.

Tenant Based Rental Assistance (TBRA), however, continues to be a challenge in a market like Newton, where the subsidy needed to support one household is so large. The City’s previous TBRA program served three households, and only one of those households was able to find permanent housing in Newton. Staff will continue to assess this program, but at this time, we feel strongly that our HOME dollars are put to better use through the creation of new units.

11.) **Comment:** We recommend that the City Council request the Planning Department make a detailed and comprehensive report to ZAP (housing) and the Programs and Services committee (human services) over the next several months to address the shortcomings above and others. It is possible for the Plans to be changes by a process called “Substantial Change”; if it is determined that changes should be made to better serve the needs of Newton’s low and moderate income citizens.

Department Response: Staff will consider this proposal, in communication with City Council leadership; however, the Planning & Development Board, acting as Newton’s Community Development Board, is the governing citizen body for the City’s CDBG, HOME and ESG Programs and staff regularly reports to the P&D Board throughout the year.

The final version of the Consolidated Plan will be submitted to HUD by June 30, 2020. Your comments and the Planning Department’s response will be included within the appendices of that final document.

Thank you again for your comments and your participation in the planning process for the FY21-25 Consolidated Plan. If you have any questions, please don't hesitate to reach me at aberman@newtonma.gov or (617) 796-1147.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amanda Berman', written in a cursive style.

Amanda Berman
Director of Housing and Community Development

Cc: Mayor Ruthanne Fuller
Barney Heath, Director of Planning & Development
Planning & Development Board

APPENDIX: CITY COUNCIL BOARD ORDER

CITY OF NEWTON

IN CITY COUNCIL

April 21, 2020

ORDERED:

That, in accordance with the recommendation of the Zoning & Planning Committee through its Chair Deborah J. Crossley, the following is hereby approved by the Honorable City Council:

#213-20 Authorization to submit FY21-FY25 Consolidation Plan and FY21 Annual Action Plan
HER HONOR THE MAYOR requesting City Council Authorization, pursuant to the 2019 Revised Citizen Participation Plan, to submit the FY21-FY25 Consolidation Plan and FY21 Annual Action Plan to the US Department of Housing and Urban Development (HUD) for the City of Newton Community Development Block Grant (CDBG) and Emergency Solution Grant (ESG) funds and the WestMetro HOME Consortium.

Under Suspension of Rules


Readings Waived and Item Approved

22 yeas 0 nays 1 absent (Councilor Baker) 1 recused (Councilor Ryan)



(SGD) DAVID A. OLSON

City Clerk



(SGD) RUTHANNE FULLER

Mayor

Date: 4/24/20

APPENDIX: CERTIFICATIONS + SF-424

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text" value="B-20-MC-25-0019"/>	
5a. Federal Entity Identifier: <input type="text" value="UPG Code: MA251650"/>	5b. Federal Award Identifier: <input type="text" value="B-20-MC-25-0019"/>	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="City of Newton"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="46-001404"/>	* c. Organizational DUNS: <input type="text" value="0765768260000"/>	
d. Address:		
* Street1: <input type="text" value="1000 Commonwealth Avenue"/>	Street2: <input type="text"/>	
* City: <input type="text" value="Newton"/>	County/Parish: <input type="text"/>	
* State: <input type="text" value="MA: Massachusetts"/>	Province: <input type="text"/>	
* Country: <input type="text" value="USA: UNITED STATES"/>	* Zip / Postal Code: <input type="text" value="02459-1149"/>	
e. Organizational Unit:		
Department Name: <input type="text" value="Planning and Development"/>	Division Name: <input type="text" value="Housing/Community Development"/>	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text" value="Mrs."/>	* First Name: <input type="text" value="Amanda"/>	
Middle Name: <input type="text"/>	* Last Name: <input type="text" value="Berman"/>	
Suffix: <input type="text"/>	Title: <input type="text" value="Director of Housing and Community Development"/>	
Organizational Affiliation: <input type="text" value="City of Newton"/>		
* Telephone Number: <input type="text" value="617-796-1147"/>	Fax Number: <input type="text"/>	
* Email: <input type="text" value="aberman@newtonma.gov"/>		

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

X: Other (specify)

Type of Applicant 3: Select Applicant Type:

*** Other (specify):**

WestMetro HOME Cons; BoS CoC

*** 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

CDBG/Entitlement Grant Program

*** 12. Funding Opportunity Number:**

B-20-MC-25-0019

*** Title:**

City of Newton CDBG Program

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Form SF 424 Attachment - Question 14.pdf

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

City of Newton CDBG Program

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:
* a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:
* a. Start Date: * b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="1,931,323.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value="100,000.00"/>
* g. TOTAL	<input type="text" value="2,031,323.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**
 a. This application was made available to the State under the Executive Order 12372 Process for review on
 b. Program is subject to E.O. 12372 but has not been selected by the State for review.
 c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**
 Yes No
If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**
 ** I AGREE
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:
Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:
* Title:
* Telephone Number: Fax Number:
* Email:

* Signature of Authorized Representative:  * Date Signed:

Form SF 424
City of Newton

14. Areas Affected by Project – Attachment

CDBG Program: City of Newton

WestMetro HOME Consortium: Bedford, Belmont, Brookline, Concord, Framingham, Lexington, Natick, Needham, Newton, Sudbury, Waltham, Watertown, and Wayland

Continuum of Care and/or ESG: Brookline, Newton, Waltham, Watertown

Form SF 424
City of Newton

16. Congressional Districts of Program/Project – Attachment
MA-003; MA-004; MA-005; MA-006

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>	4. Applicant Identifier: E20-MC-25-0010	
5a. Federal Entity Identifier: UPG Code: MA251650	5b. Federal Award Identifier: E20-MC-25-0010	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="City of Newton"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 46-001404	* c. Organizational DUNS: 0765768260000	
d. Address:		
* Street1: 1000 Commonwealth Avenue	Street2: <input type="text"/>	
* City: Newton	County/Parish: <input type="text"/>	
* State: MA: Massachusetts	Province: <input type="text"/>	
* Country: USA: UNITED STATES	* Zip / Postal Code: 02459-1149	
e. Organizational Unit:		
Department Name: Planning and Development	Division Name: Housing/Community Development	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: Mrs.	* First Name: Amanda	Middle Name: <input type="text"/>
* Last Name: Berman	Suffix: <input type="text"/>	
Title: <input type="text" value="Director of Housing and Community Development"/>		
Organizational Affiliation: <input type="text"/>		
* Telephone Number: 617-796-1147	Fax Number: <input type="text"/>	
* Email: <input type="text" value="aberman@newton.gov"/>		

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

X: Other (specify)

Type of Applicant 3: Select Applicant Type:

* Other (specify):

WestMetro HOME Cons; BoS CoC

*** 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.231

CFDA Title:

City of Newton ESG Program

*** 12. Funding Opportunity Number:**

E20-MC-25-0010

* Title:

City of Newton ESG Program

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Form SF 424 Attachment - Question 14.pdf

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

City of Newton ESG Program

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="167,734.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value=""/>
* g. TOTAL	<input type="text" value="167,734.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:



* Date Signed:

Form SF 424
City of Newton

14. Areas Affected by Project – Attachment

CDBG Program: City of Newton

WestMetro HOME Consortium: Bedford, Belmont, Brookline, Concord, Framingham, Lexington, Natick, Needham, Newton, Sudbury, Waltham, Watertown, and Wayland

Continuum of Care and/or ESG: Brookline, Newton, Waltham, Watertown

Form SF 424
City of Newton

16. Congressional Districts of Program/Project – Attachment
MA-003; MA-004; MA-005; MA-006

Application for Federal Assistance SF-424	
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	
* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	
* If Revision, select appropriate letter(s): _____ * Other (Specify): _____	
* 3. Date Received: _____	4. Applicant Identifier: M20-DC25-0213
5a. Federal Entity Identifier: UPG Code: MA251650 Newton	5b. Federal Award Identifier: M20-DC25-0213
State Use Only:	
6. Date Received by State: _____	7. State Application Identifier: _____
8. APPLICANT INFORMATION:	
* a. Legal Name: City of Newton	
* b. Employer/Taxpayer Identification Number (EIN/TIN): 46-001404	* c. Organizational DUNS: 0765768260000
d. Address:	
* Street1: 1000 Commonwealth Avenue	Street2: _____
* City: Newton	County/Parish: _____
* State: MA: Massachusetts	Province: _____
* Country: USA: UNITED STATES	Zip / Postal Code: 02459-1149
e. Organizational Unit:	
Department Name: Planning and Development	Division Name: Housing/Community Development
f. Name and contact information of person to be contacted on matters involving this application:	
Prefix: Mrs.	* First Name: Amanda
Middle Name: _____	* Last Name: Berman
Suffix: _____	Title: Director of Housing and Community Development
Organizational Affiliation: _____	
* Telephone Number: 617-796-1147	Fax Number: _____
* Email: aberman@newton.gov	

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

X: Other (specify)

Type of Applicant 3: Select Applicant Type:

*** Other (specify):**

WestMetro HOME Cons; BoS CoC

*** 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnerships Program

*** 12. Funding Opportunity Number:**

MA20-DC25-0213

*** Title:**

WestMetro HOME Consortium

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Form SF 424 Attachment - Question 14.pdf

*** 15. Descriptive Title of Applicant's Project:**

WestMetro HOME Consortium Program

Attach supporting documents as specified in agency instructions.

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="1,480,032.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value="350,000.00"/>
* g. TOTAL	<input type="text" value="1,830,032.00"/>

19. Is Application Subject to Review By State Under Executive Order 12372 Process?

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

- Yes
- No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

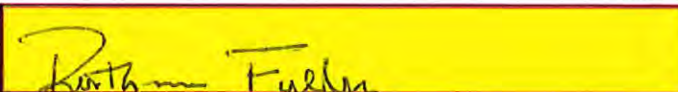
Authorized Representative:

Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative: 

* Date Signed:

Form SF 424
City of Newton

14. Areas Affected by Project – Attachment

CDBG Program: City of Newton

WestMetro HOME Consortium: Bedford, Belmont, Brookline, Concord, Framingham, Lexington, Natick, Needham, Newton, Sudbury, Waltham, Watertown, and Wayland

Continuum of Care and/or ESG: Brookline, Newton, Waltham, Watertown

Form SF 424
City of Newton

16. Congressional Districts of Program/Project – Attachment
MA-003; MA-004; MA-005; MA-006

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.


PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Newton; Community Development Block Grant Program	DATE SUBMITTED 5/12/20

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ASSURANCES - NON-CONSTRUCTION PROGRAMS

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1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Newton; ESG program	DATE SUBMITTED 5/12/20

Standard Form 424B (Rev. 7-97) Back

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2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
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4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
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12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Newton; HOME Investment Partnerships Program	DATE SUBMITTED 5/12/20

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ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

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4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Newton, Community Development Block Grant program	DATE SUBMITTED 5/12/20

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ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

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14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Newton, ESG program	DATE SUBMITTED 5/12/20

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ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
 Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.


PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant:, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Newton, HOME Investment Partnerships program	DATE SUBMITTED 5/12/20

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CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.


Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

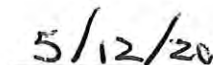
1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

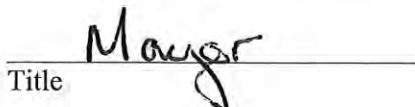
Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.


Signature of Authorized Official


Date


Title

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) FY21-25 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.

Ruthanne Fuller
Signature of Authorized Official

5/12/20
Date

Mayor
Title

OPTIONAL Community Development Block Grant Certification

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

Ruthann Fuller
Signature of Authorized Official

5/12/20
Date

Manager
Title

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

Ruthann Fuller
Signature of Authorized Official

5/12/20
Date

Mayor
Title

Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

Major rehabilitation/conversion/renovation – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for these individuals.

Matching Funds – The recipient will obtain matching amounts required under 24 CFR 576.201.

Confidentiality – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

Discharge Policy – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Ruthanne Fullin
Signature of Authorized Official

5/12/20
Date

Mayor
Title

Housing Opportunities for Persons With AIDS Certifications

The HOPWA grantee certifies that:

Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

Signature of Authorized Official

Date

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.